

# Fraud Examiners in Private Investigations of White-Collar Crime



Petter Gottschalk

## Introduction

Investigating white-collar crime is like any other investigation concerned with the past. Investigating is to find out what happened in the past. A negative event or a sequence of negative events can be at the core of an investigation. If there is no certainty about events, then finding out whether or not something has occurred can be at the core of an investigation. An investigation can be concerned with events that did occur or events that did not occur. An investigation is a reconstruction of the past. Information is collected and knowledge is applied to reconstruct the past.

What happened or did not happen? Investigators first develop their know-what in terms of events or absence of events. It might be a bribe that was paid, money that was embezzled, tax that was not paid, or a bank that was defrauded. An investigation typically starts by finding facts about what happened.

How did it happen or not happen? Investigators develop a hypothesis about the path for what happened. They identify information sources that support or disapprove the hypothesis. If the hypothesis is discarded, then a new path for what happened is identified.

Why did it happen? Investigators try to establish causality in terms of cause and effect. The cause may be a motive, another event, or something else. Causality is easily assumed but very difficult to prove in terms of evidence in an investigation.

Who did what to make it happen or not happen? This is where investigators have to be very careful, especially when it comes to suspects of misconduct and crime. Investigators should work just as hard to prove innocence as to prove guilt. Investigators should give suspects the benefit of the doubt. Suspects must be given the right of contradiction, where they can disagree with what investigators claim to have found out about them.

---

P. Gottschalk (✉)  
BI Norwegian Business School, Oslo, Norway  
e-mail: [petter.gottschalk@kruttforlag.no](mailto:petter.gottschalk@kruttforlag.no)

Investigators should involve themselves in neither prosecution nor sentencing. Investigators should leave to public prosecutors whether or not a person or persons should be prosecuted. If the evidence is not convincing and compelling, then charges should not be pressed. If the prosecutor fails to convince the judge in the question of guilt, then the defendant is to be acquitted. Defendants are to be given the benefit of the doubt.

Investigators collect information from a number of sources, and they apply a variety of knowledge categories. Information collection involves sources such as interviews with witnesses and suspects, search in documents and e-mails, and observation of actors. Knowledge categories include organizational behavior, management decision-making, business practices, market structures, accounting principles, deviant behaviors, personal motives, violation of laws, and past verdicts.

While being like any other investigation concerned with the past, investigating white-collar crime has its specific aspects and challenges. For example, while street criminals typically hide themselves, white-collar criminals hide their crime. Burglars leave traces of the crime and disappear from the scene. White-collar criminals do not disappear from the scene. Instead, they conceal illegal actions in seemingly legal activities. Bribed individuals stay in their jobs, bribing individuals stay in their jobs, embezzling individuals stay in their jobs, and those who commit bank fraud stay in their jobs. They hide their criminal acts among legitimate acts, and they delete tracks. They create an atmosphere at work where nobody questions their deviant behavior.

Another challenge in white-collar crime investigations is the lack of obvious victims. At instances of burglary, murder, or rape, there are obvious and visible victims. In the case of tax evasion, nobody notices any harm or damage. In the case of subsidy fraud, where a ferry company reports lower passenger numbers, the local government does not notice that it has been deceived. Victims of white-collar crime are typically banks, the revenue service, customers, and suppliers. The most frequent victim is the employer, who does not notice embezzlement or theft by employees.

A third challenge in white-collar crime investigations is the resources available to suspects. While a street criminal tends to be happy – at least satisfied – with a mediocre defense lawyer, white-collar criminals hire famous attorneys to help them in their cases. While a street crime lawyer only does work on the case when it ends up in court, white-collar lawyers involve themselves to prevent the case from ever ending up in court. A white-collar lawyer tries to disturb the investigation by supplying material in favor of the client, while preventing investigators insight into material that is unfavorable for the client. This is information control that aims at preventing investigators from getting the complete picture or aims at helping investigators to get a distorted picture of past events. In addition, white-collar lawyers engage in symbolic defense, where they use the media and other channels to present the client as a victim rather than as a potential offender.

White-collar crime investigations are carried out by a variety of professionals in different organizations. Detectives in law enforcement agencies are the most typical crime investigators. All nations in the world have police investigators who

reconstruct the past when an offense has occurred. Maybe the most well-known agency is the Federal Bureau of Investigation (FBI) in the USA. The FBI has the authority and responsibility to investigate specific crime assigned to it and to provide other law enforcement agencies with cooperative services, such as fingerprint identification, laboratory examinations, and training. The FBI also gathers, shares, and analyzes intelligence, both to support its own investigations and those of its partners. The FBI is the principal investigative arm of the US Department of Justice (Kessler, 2012). In its white-collar crime program, the FBI focuses on identifying and disrupting public corruption, money laundering, corporate fraud, securities and commodities fraud, mortgage fraud, financial institution fraud, bank fraud and embezzlement, healthcare fraud, and other kinds of financial crime.

Other countries have similar bureaus. For example, in Norway, the Norwegian National Authority for Investigation and Prosecution of Economic and Environmental Crime (Økokrim) is the central unit for financial crime investigations. Økokrim is both a police specialist agency and a public prosecutors' office with national authority. Both the FBI and Økokrim focus on complex investigations that are international or national in scope and where the agencies can bring to bear unique expertise or capabilities that increase the likelihood of successful white-collar crime investigations.

Outside regular law enforcement, we find other investigating agencies within the public sector. An example is the IRS Criminal Investigation Division in the USA. The division investigates potential criminal violations of the US internal revenue code and related financial crime in a manner intended to foster confidence in the tax system and deter violations of tax law.

Outside governments' criminal justice systems, private investigators can be found internally in organizations and externally. An example of internal investigators is fraud examiners in insurance companies who investigate insurance customers' claims. Another example is internal investigators in banks who investigate suspicions of fraud and money laundering. A final example is internal auditors and compliance officers who investigate suspicions of financial crime.

External investigators are fraud examiners who are hired by clients to perform investigations in the clients' organizations. While the investigators are employed by law firms, accounting firms, and consulting firms, they are hired by business and government organizations to carry out internal investigations. They have backgrounds such as forensic accountants, police detectives, business lawyers, organizational psychologists, and executive managers.

## **Private Internal Investigations**

The purpose of an internal investigation by fraud examiners is to reconstruct the past. The past may be an event or a series of events where, for example, someone did something to somebody. Events are typically negative and have caused some damage. The goal of an investigation is to uncover the facts in a particular situation.

In doing so, the truth about the situation is the ultimate goal. A private investigation is mainly after the facts, with the goal of determining how a negative event occurred or the goal of determining whether the suspected action occurred at all. The goal may also be to prevent a situation from ever occurring in the first place or to prevent it from happening again.

Private fraud investigators are not in the business of law enforcement. They are not to find private settlements when penal laws are violated (Schneider, 2006). Their task is to reconstruct the past as objectively and completely as possible. They are not in the blame game business (Gottschalk, 2016).

Internal private investigations examine the facts, sequence of events, and causes of negative events as well as who are responsible for such events. Pending on what hiring parties ask for, private investigators can either look generally for possible corrupt or otherwise criminal activities within an agency or a company or look more specifically for those committing potential white-collar crime. In other situations, it is the job of the private investigators to look into potential opportunities for financial crime to occur, so that the agency or company can fix those problems in order to avoid misconduct down the road.

Internal investigations include fact-finding, causality studies, change proposals, suspect identification, and assessment of financial irregularities. The form of inquiry aims to uncover unrestricted opportunities, failing internal controls, abuse of position, and any financial misconduct such as corruption, fraud, embezzlement, theft, manipulation, tax evasion, and other forms of economic crime.

Characteristics of a private investigation situation include a serious and unusual event, an extraordinary examination to find out what happened or why it did not happen, develop explanations, and suggest actions toward individuals and changes in systems and practices. A private investigator is someone hired by individuals or organizations to undertake investigatory services. A private investigator also goes under the titles of a private eye, private detective, inquiry agent, fraud examiner, private examiner, financial crime specialist, or PI (private investigator) for short. A private investigator does the detailed work to find the answers to misconduct and crime without playing the roles of a prosecutor or a judge. The PI stops the investigation before passing any judgment on criminal liability.

An internal investigation is a goal-oriented procedure for reconstructing past events. It is a procedure of creating an account of what has happened, how it happened, why it happened, and who did what to make it happen or let it happen. An internal investigation is a reconstruction of past events and sequence of events by collecting information, developing knowledge, and presenting evidence (Osterburg and Ward, 2014).

Internal private investigations typically have the following characteristics:

- Extraordinary examination of suspicions of misconduct and crime.
- Goal-oriented data collection.
- Based on a mandate defined by and with the client.
- Clarify facts, analyze events, and identify reasons for incidents.
- Evaluate systems failure and personal misconduct.

- Independent, careful, and transparent work.
- Client is responsible for implementation of recommendations.

White-collar crime investigations are a specialized knowledge industry. Williams (2005) refers to it as the forensic accounting and criminal investigation industry. It is a unique industry, set apart from law enforcement, due to its ability to provide “direct and immediate responsiveness” to client objectives, needs, and interests, unlike police who are bound to one specific legal regime (Williams, 2005: 194). The industry provides flexibility and a customized plan of attack according to client needs.

Investigations take many forms and have many purposes. Carson (2013) argues that the core feature of every investigation involves what we reliably know. The field of evidence is no other than the field of knowledge. There is an issue of whether we can have confidence in knowledge. Confidence in knowledge occurs when knowledge is documented in terms of evidence. A private investigator accumulates knowledge about what happened.

## Reasons for Private Investigations

Criminal investigation is initiated when there is a need to study negative incidents and events that happened in the past. Contrary to the police, regulators, and other investigative agencies, forensic accounting and corporate investigation firms are able to conduct their investigations under a cloak of secrecy providing resolutions that are largely private in nature and which help to safeguard the client from embarrassment and unwanted publicity. Many companies want to deal with misconduct internally by resolving the matter by themselves. They want no publicity. They want to avoid courts, for example, because they do not want their shareholders, customers, or suppliers to see that misconduct and crime has occurred. Cases are resolved through informal means such as negotiated settlements and termination of an offending employee (Williams, 2014).

Corporations and other organizations value the possibility of secrecy, discretion, and control that private specialists bring to investigations. Openness could lead to problems such as reputational loss, which can have economic repercussions. While private investigations can consider secrecy, openness is a key characteristic of a public criminal justice procedure. Meerts (2014) argues that the reluctance of victim companies to report crime to the police because of fear of reputational damage is a well-researched subject. Reputational damage provides a motivation for a company to avoid publicity (Dupont, 2014: 272):

The reputation of a company represents a valuable asset that can quickly become a liability when the erosion of customers’ and suppliers’ trust provokes a loss of competitiveness. Shareholders are also very receptive to such signals and several security managers explained how their performance was indirectly tied to their company’s public valuation. The ambiguity that characterizes this risk category explains why contract security firms providing

investigative and consulting services of all sorts are routinely called in before the police – when the police are involved at all – in order to minimize external scrutiny and to maximize procedural control.

An important advantage of private investigations is legal flexibility. After an internal investigation, the client can choose from an array of legal alternatives and can decide which is best for the current case. Law enforcement, however, is more limited, generally working toward a criminal prosecution or taking no further action by dismissing the case. Minimizing and repairing damage is often the focus of private investigations, and thus other legal possibilities than those provided by criminal law are attractive. Employers often have nothing to gain by triggering a criminal justice procedure (Meerts, 2014).

Another advantage of private investigations is private examiners' role in the deterrence of fraud. The principle of deterrence is important in the perspective of convenience theory as described below. However, poor investigations do not deter people from committing fraud.

Private sector investigative consultants conduct inquiries for their clients in cases of suspected corporate crime. Recent developments internationally when it comes to corporate criminal liability have led many business and government organizations to recruit consultants to develop internal compliance systems because the function of such systems is increasingly taken into account by prosecution authorities.

While public police are bound to the legal definitions of criminal conduct, corporate security is more flexible and can adapt to the definitions provided by their clients. Private investigators can focus exclusively on the occurrences pointed out as problematic by their clients. This means that private investigators can examine behavior harmful to their clients that is not criminal and, conversely, that they can ignore behavior that is criminal but not damaging to their client (Meerts, 2014).

Internal investigations in private and public organizations serve important functions in society. They allow entities to discover misbehavior within management, make corrections, and define future conduct to assure compliance with laws, regulations, policies, and guidelines. Private investigations offer organizational solutions to organizational problems, while providing an incentive to corporations and public authorities to unmask misconduct. Internal investigations also allow corporations as well as other organizations to quietly examine allegations that may later prove to be wrong, without fear that disclosure will hurt the organization's or an individual's reputation (Green and Podgor, 2014).

Another reason for private internal investigations is that white-collar crime often is a difficult crime for police to handle. Police forces and their resources are frequently stretched thin and mainly focused on potential terrorism, physical violence, and threats to the health of citizens. Successful prosecutions of white-collar crime are frequently knowledge and labor intensive, and a decision has to be made as to where people and man-hours are going to be allocated (Brooks and Button, 2011).

## Private Fraud Examinations

Fraud investigations into individuals and organizations by private investigators have increased in intensity. No amount of legislation can protect against dishonesty (Coburn, 2006). When an organization wants to investigate facts, causes, and responsibilities for an incident, the investigation can be carried out by financial crime specialists and fraud examiners. Fraud examination has elements of intelligence, investigation, as well as analysis, like we know it from police work. Characteristics of inquiries where the term fraud examination is used include fact-finding, causality study, change proposals, and suspect identification.

Fraud examination as intelligence emphasizes the systematic and goal-oriented collection of information that is transformed and analyzed according to a rigid procedure to detect suspects' capacity, dispositions, and intentions. The purpose is to improve both prevention and detection of crime. Risk-based techniques can be applied to survey environments and persons in order to collect information on their moves. Intelligence can also be defined as the result of information collection about possible offenses and potential suspects to make conclusions about threats, point out problems, and identify criminal activity with an intention to follow the case.

Fraud examination as investigation is the systematic and goal-oriented collection of information to confirm or disconfirm that an action is crime and that the actor is a criminal. Investigation is to prepare evidence for court proceedings. An investigation occurs only when something wrong has happened, while intelligence occurs when something wrong might happen.

Fraud examination as analysis is the process of breaking down a complex material or subject into smaller pieces to improve understanding and insight into the case. Analysis is to create meaning based on data by manipulating, interpreting, and reorganizing the structure of collected evidence. To analyze is to ask questions such as what, where, how, who, when, and why. What happened? How did it happen? Why did it happen? Elements of know-what, know-how, and know-why are created through analysis.

While fraud examination has elements of intelligence, investigation, and analysis as we know it from police work, it is something different. For intelligence, something might happen. For investigation, something has happened. For analysis, evidence is to be produced. In fraud examinations, something might happen or something has happened. Fraud examiners do not know when they start their work.

Wikipedia applies the following definition of a private investigator:

A private investigator (often abbreviated to PI and informally called a private eye), a private detective or inquiry agent, is a person who can be hired by individuals or groups to undertake investigatory law services. Private detectives/investigators often work for attorneys in civil cases. A handful of very skilled private detectives/investigators work with defense attorneys on capital punishment and criminal defense cases. Many work for insurance companies to investigate suspicious claims. Before the advent of no-fault divorce, many private

investigators were hired to search out evidence of adultery or other conduct within marriage to establish grounds for a divorce. Despite the lack of legal necessity for such evidence in many jurisdictions, according to press reports collecting evidence of adultery or other “bad behavior” by spouses and partners is still one of the most profitable activities investigators undertake, as the stakes being fought over now are child custody, alimony, or marital property disputes.

Private investigators can also be used to perform due diligence for an investor who may be considering investing money with an investment group, fund manager or other high-risk business or investment venture. This could serve to help the prospective investor avoid being the victim of a fraud or Ponzi scheme. By hiring a licensed and experienced investigator, they could unearth information that the investment is risky and or that the investor has suspicious red flags in his or her background. This is called investigative due diligence, and is becoming much more prevalent in the 21st century with the public reports of large-scale Ponzi schemes and fraudulent investment vehicles such as Madoff, Stanford, Petters, Rothstein and the hundreds of others reported by the SEC and other law-enforcement agencies.

Wells (2003) argues that becoming a fraud examiner – a kind of a financial detective – is not for everyone. Detectives – either in the law enforcement or in the private sector – typically have distinct personality traits. They need to be as good with people as they are with numbers, and they need to be inclined to be aggressive rather than shy and retiring.

Gill and Hart (1997) found that the market for private fraud examinations is growing; because client companies are rarely keen to involve the police in fraud investigations, a prosecution may expose them to speculation about their internal procedures. Corporate clients tend to take the greatest care to ensure the confidentiality of the investigations they commission. Private investigators receive instructions to examine various kinds of fraud.

## Financial Crime Specialists

The Association of Certified Financial Crime Specialists (ACFCS) was created to respond to a growing need for documented, verifiable, and certifiable knowledge and skill in the financial crime field and to meet the career development needs of the diverse and growing number of specialists in the private and public sectors who work in this field (CFCS, 2013).

ACFCS is a member organization that provides training, news, analysis, and networking to a worldwide membership of professionals in financial crime field. ACFCS awards the Certified Financial Crime Specialist (CFCS) certification to persons who meet certain qualifications and pass a rigorous examination offered at 700 authorized testing centers worldwide. It is a credential that tests competence and skill across the financial crime spectrum, including money laundering, corruption, tax evasion, compliance, investigations, and other fields.

A private investigation is conducted by a variety of private sector financial crime specialists who can be investigators, forensic accountants, or lawyers, all whom may be supported by investigative analysts, who the government usually calls intelligence analysts.

ACFCS stresses the importance of the following topics for financial crime specialists:

1. The challenge of financial crime
2. Financial crime overview, commonalities, and convergence
3. Money laundering
4. Understanding and preventing fraud
5. Global anti-corruption compliance and enforcement
6. Tax evasion and enforcement
7. Asset recovery
8. Financial crime investigations
9. Interpreting financial documents
10. Money and commodities flow
11. Compliance programs and controls
12. Data security and privacy
13. Ethical responsibility and best practices
14. International agreements and standards

In the UK, it is expected that companies contribute to detection of law violations in terms of self-reports. For a self-report to be taken into account as a public interest factor tending against prosecution, it must form part of a genuinely proactive approach adopted by the corporate management team. Prosecutors will consider whether it has provided sufficient information, including making witnesses available and disclosing the details of any internal investigation, about the operation of the corporate body in its entirety. This is according with the UK Serious Fraud Office Guidance on corporate prosecutions.

According to the UK Serious Fraud Office Guidance on corporate prosecutions:

1. Initial contact, and all subsequent communication, must be made through the SFO's Intelligence Unit. The Intelligence Unit is the only business area within the SFO authorized to handle self-reports.
2. Hard copy reports setting out the nature and scope of any internal investigation must be provided to the SFO's Intelligence Unit as part of the self-reporting process.
3. All supporting evidence including but not limited to e-mails, banking evidence, and witness accounts must be provided to the SFO's Intelligence Unit as part of the self-reporting process.
4. Further supporting evidence may be provided during the course of any ongoing internal investigation.

ACFCS – [www.acfcs.org](http://www.acfcs.org) – offers the CFCS certification exam from its headquarters in Miami, Florida. This is the CFCS examination outline:

- Understanding financial crime: financial crime commonalities, money laundering controls and investigation, ethical responsibility, and best practices
- Investigating financial crime: financial crime investigation, fraud detection and investigation, money and commodities flow

- Enforcement actions and mechanisms: tax evasion and enforcement, asset recovery
- Compliance: programs and controls, global anti-corruption compliance and enforcement, international regulations and standards, data security and privacy

The University of New Haven and the Association of Certified Financial Crime Specialists (ACFCS.org) announced in 2013 that the Department of Criminal Justice at the University of New Haven was the first to offer a course leading ACFCS certification. Students enrolled in the course on investigating financial crimes were to learn the legal, ethical, and practical aptitudes necessary to become financial crime specialists. The course was to use the 340-page CFCS Certification Exam Study Manual and online, on-demand preparation course from ACFCS as its educational materials ([www.newhaven.edu](http://www.newhaven.edu)).

## Certified Fraud Examiners

The Association of Certified Fraud Examiners (ACFE 2016) was created for similar reasons as the ACFCS. Becoming a certified fraud examiner requires documented academic and professional qualifications. Formal education in the fraud examination field is new and limited (Wells, 2003). The ACFE website ([www.acfe.com](http://www.acfe.com)) addresses the needs of ACFE members and also provides free resources to the general public (Anders, 2006). Certified fraud examiners have ample career opportunities, since the CFE certification was created in response to the demand for expertise in fraud prevention and detection (Morgan and Nix, 2003).

Perhaps Debbie Cutler was born to be a fraud examiner (Wells, 2003: 77):

When I was young, my family referred to me as Perry Mason," she said. "I was a very inquisitive child who wouldn't give up until I got the answers." It was happenstance that led her to combine her natural talents with her accounting degree. "I'd spent 10 years in public accounting performing traditional audit work," Cutler said. "One day a partner invited me to help investigate an accounting malpractice case that included fraud allegations against a U.S. senator. I jumped at the chance, and as it turned out, I loved the work.

Like in other countries, investigators in the USA have a variety of backgrounds. It is not only lawyers, accountants, and business consultants who are investigators. Sociologists and criminologists may also undertake tasks relating to the investigation. Examples are mentioned by Kennedy (2013), who writes about forensic sociology and criminology. Investigation by sociologists and criminologists might be concerned about people who have neglected responsibility, people who have abused their positions, or organizations where training and guidelines have been missing.

Thus, fraud examiners encompass a wide array of professions, including auditors, accountants, fraud investigators, loss prevention specialists, attorneys, educators, sociologists, and criminologists. While fraud examiners in the USA can work independently, many are also member of the ACFE. Fraud examiners provide a

broad range of services to businesses and governmental agencies as either employees or independent consultants (ACFE, 2008). A fraud examiner may assist in a fraud investigation by procuring evidence, taking statements, and writing reports (Machen and Richards, 2004).

When hiring a fraud examiner, a company should seek an evaluation that is both disinterested and reliable (Machen and Richards, 2004: 68):

These objectives, however, can occasionally conflict. Where employees within the organization conduct the fraud investigation, the results of such an investigation may be considered suspect because they are obtained by parties who are or at least appear to be biased. Thus, while the company may prefer to use examiners with historical knowledge and details about the company, personnel, and accounting systems, their retention may raise issues of credibility. On the other hand, while the investigation of a fraud examiner who has no prior connection with the company may be unbiased, the resulting evaluation may also exhibit the examiner's inexperience with the particular organization and its business practices.

In balancing the twin goals of disinterestedness and reliability, Machen and Richards (2004) suggest that a company should consider the purpose of the investigation. Where the results are to be used in-house or where the company is simply establishing a fraud prevention system, there is less concern regarding credibility. Thus, a fraud examiner who has knowledge of the business may be a smarter choice in that instance because of such examiner's familiarity with the company. In contrast, where information from the fraud investigation may be subject to scrutiny by those outside the company, the appearance of disinterestedness becomes more critical, and the company should consider hiring an independent fraud examiner.

Within the broad category of fraud examiners are forensic accountants who specialize in a unique brand of accounting that departs from the traditional methods employed in the accounting field (Machen and Richards, 2004).

Similar to the situation in the UK, where companies are expected to contribute to detection of law violations in terms of self-reports, companies in the USA are expected to make disclosures. Prosecutors in the USA consider whether the company made a voluntary and timely disclosure as well as the company's willingness to provide relevant information and evidence and identify relevant actors inside and outside the company, including senior executives. This is according to a resource guide to the US Foreign Corrupt Practices Act.

In their report to the nations on occupational fraud and abuse, ACFE (2014) analyzed more than a thousand cases of occupational fraud. The majority of cases reported (61%) were referred to law enforcement for criminal prosecution. The median loss for cases referred to prosecution was \$200,000, while cases that were not referred had a median loss of \$75,000.

The Association of Certified Fraud Examiners is not a USA-only organization. The CFE designation is an international designation, and the ACFE has reported approximately 40% of its membership is outside of the USA. These are all fraud fighters. Rumors tell that there are at least 16 CFEs in Norway.

## Police Versus Internal Investigations

An investigation is an investigation, regardless of whether the investigator belongs to a police agency or a private firm. The goal is to uncover the facts in a particular situation. In doing so, the truth of the situation is the ultimate objective. However, an investigation by the police is going to start with a crime or a suspected crime, and the end goal is going to arrest and successfully prosecute the guilty person(s) or, alternatively, dismiss the case because of innocence or lack of evidence. A private investigation is mainly after the facts, with the goal of determining how a negative event occurred or with the goal of determining whether the suspected action occurred at all. The goal might also be to prevent a situation from ever occurring in the first place or to prevent it happening again. Of course, if there was no event, there is nothing to investigate. Fraud awareness as prevention and fraud investigations can be carried out separately and have different objectives.

The purpose of an internal investigation is to define the points to prove and then collect documentary, interview-based, and other evidence which either confirms these or finds that there is no case to answer. These conclusions and the evidence, on which they are based, are set out in a report which should then be considered by a person or people external to, and independent from, the investigation process.

Police investigations differ from private investigations because they aim to convict a person of a crime or dismiss a person from the case, while internal investigations are used more to evaluate potential for economic crime to occur and to get rid of the issue internally rather than through the involvement of the police.

Private investigators tend to be offense focused, while police investigators tend to be suspect focused. However, despite these differences, there is sufficient commonality between the two types of investigation so as to make cooperation and joint working between the two possible. For example, they each gather intelligence on accepted cases, interview suspects in accordance with defined procedures, and preserve evidential continuity. In addition, both separate intelligence from investigation, employ trained and qualified staff, use credit reference and other publically available data, record their investigations in a computerized case management system, and utilize interview rooms and evidence storage.

The roles of police officers and private investigators are different in the fact that they do not have the same powers. Police officers have strict rules that they have to follow within their department. They are responsible for following the rules and guidelines set before them by their law enforcement unit. Private investigators have more freedom to explore and conduct inquiries into suspected crime and criminals. However, the police officers' advantage is their ability to seize documents and subpoena the guilty party. The police have formal power in terms of law enforcement on behalf of society. While private police have less power in their work, they enjoy more freedom in how they do their work. Private investigators do not have the same powers as the police and do neither have to work according to strict guidelines such as the police.

The government allows the police to conduct special investigation activities such as intrusive inquiry, covert human operations, infiltration, surveillance, and covert recording of communications. The police may set up undercover enterprises, institutions, organizations, and units. During undercover questioning, law enforcement officers can mask their identity or purpose of the questioning.

The criticism that comes with white-collar crime is the cost of policing fraud. When dealing with small internal frauds, “police would be called but often they did not offer help” (Brooks and Button, 2011: 307). The lack or number of limited resources has constrained the police force in dealing with fraud. The private sector has criticized the police for their lack of willingness to tackle the issue of investigating fraud, but it is sometimes out of their control when resources are not available to confront the issue. It is sometimes also a question of whether the police view fraud as a serious crime or if they have the capabilities in education and training to tackle economic crime (Button, Frimpong, Smith, & Johnston, 2007).

Organizations may feel that the police lack commitment to their cases and not report it. Their next step might be to report it to the private investigation sector. This can result in problems in which fraud may be seen as a private matter and “can downgrade the seriousness of the offence as it does not require a public ‘state’ sanction, censure and condemnation and is hidden, and dealt with in-house in a secretive manner” (Brooks and Button, 2011: 310). People go to private investigators when they feel that the police will not take their issues seriously. However, the police still hold power when preparing an arrest and identifying whether or not a place is relevant for search of evidence. The police must be present when an unwanted search occurs on business premises or homes.

Gill and Hart (1997) argue that distinctions between public and private forms of policing are becoming increasingly blurred, and a number of hybrid organizations have materialized as gray policing. The two sectors overlap in different ways. While the public police have traditionally expressed skepticism about the caliber of their private sector counterparts, there are a number of examples of effective cooperation as well. In some instances, public police have benefited from an additional source of relevant information.

Private investigators have the criticism of whether or not they have a bias toward the client that hires them to investigate the organization. They are the ones usually paid to do the investigation by the client to find something out of the ordinary. This can cause a bias when conducting their research. The private investigator might report in the client’s favor because they are the ones paying for the investigation. The investigator might not want to go against the client that is paying for their service. This will result in a negative effect toward the other parties involved. Clients “may themselves attempt to influence investigations in order to limit lines of responsibility and produce narrow interpretations of incidents” (Williams, 2005: 199). There will then be “a constant tension between commercial imperatives and professional standards” in white-collar crime investigations (Williams, 2005: 199).

A private investigator can potentially challenge the rule of law by taking on all three roles of police investigator, public prosecutor, and court judge. This kind of

privatization of law enforcement can represent a threat to the criminal justice system in democratic societies (Gottschalk, 2016).

Private investigators may work alongside police detectives in order to collect evidence. Direct evidence is physical proof of an illegal act such as forensic samples such as hair, clothing fibers, or computer documents. Indirect evidence is collected through interviewing witnesses or potential accomplices or through someone identifying the offender, for example, in a photograph (Carson, 2013).

Witness intimidation should be minimized or completely avoided in interviews. Certain witnesses to an investigation might feel intimidated by the alleged wrongdoer, even by the simple fact that the alleged wrongdoer is in the workplace. Even worse, the alleged wrongdoer (and even the complainant) might intimidate, harass, or retaliate against witnesses in an attempt to influence the outcome of an investigation. Extreme circumstances might require removing the suspect, the complainant, or witnesses from the workplace via paid suspension.

## Investigative Thinking Styles

Financial crime specialists and fraud examiners might be compared to police detectives in their thinking styles and investigative approaches. As argued by Wells (2003), becoming a fraud examiner – a kind of a financial detective – is not for everyone. Detectives – either in the law enforcement or in the private sector – typically have distinct personality traits. They are as good with people as they are with numbers and documents, and they are inclined to be curious, creative, and aggressive, rather than shy, isolated, and retiring.

Dean (2005) developed a set of four thinking styles, which later were enhanced by Staines (2013), as illustrated in the figure:

- *Thinking style 1: Investigation as method.* Detectives describe this way of thinking as following a “method” that is driven by a set of basic procedural steps and conceptual processes for legally gathering information and building evidence. The method style is underpinned by a preference for following established rules and procedures, such as standard operating procedures, in order to gather information and build evidence in investigation.

The investigator is trained in procedural steps of investigation and takes an evidence-focused rather than suspect-focused approach. According to Tong (2009b), the science of investigation exists in direct opposition to the conception of the art of investigation, which is related to the risk thinking style. The science of investigation is taught in classrooms and documented in manuals and handbooks, while the art of investigation is stimulated by creativity as well as innovative and untraditional approaches.

Method thinkers are characterized by the desire to avoid confusion, a rigidity of thought, and a reluctance to consider alternative views as long as they are not along the main lines of investigation. They process information extensively and carefully

and focus their attention on a few critical hypotheses. They work within existing rules and frameworks. They are checking all the boxes on a checklist. They apply a structured approach to investigative procedures.

- *Thinking style 2: Investigation as challenge.* Detectives describe this way of thinking as a
- “challenge” driven by the intensity that is generated by the four key processes of the job, the victim, the criminal, and the crime. The challenge style is underpinned by an intense motivation, and the job is perceived by the challenge thinker as an opportunity to fight crime and make community safe.

There is also a perceived need to seek justice for the victim. The stimulating nature of whether or not a crime has occurred provides motivation for the challenge thinker, and generally, the more interesting the possible crime, the more challenged and motivated the detective becomes. Because the challenge thinking style often involves deep emotional involvement by the detective, it can lead to extreme feelings of sympathy and antipathy as well as immense satisfaction if the case is successfully solved. Alternatively, failure to solve the case can result in feelings of being a loser and extreme frustration.

At the extreme, the challenge style can lead to the fragmentation of other aspects of the detective’s life in such a way that often the price to be paid for this addiction to the investigative challenge is marriage problems, financial problems, and unstable private personality. The challenge thinker is really a crime fighter, as discussed by Siegel (2009). The challenge thinker is vulnerable to problematic outcomes in life if he or she is not able to mediate personal enthusiasm or passion for the job. Some level of drive and enthusiasm is of course necessary to maintain commitment to the job. However, it is more desirable for detectives to subscribe to the challenge style only to the extent that it keeps them interested and committed to their job and not to the extent they become overwhelmed and experience burnout. This is also important when considering the possibility of the challenge style acting as a force that can potentially motivate police honesty as well as private investigator honesty in an impatient search for answers (Goldschmidt and Anonymous, 2008).

Goldschmidt and Anonymous (2008) reviewed the circumstances that may lead police officers to act dishonestly. One reason was to see a case won, the suspect convicted and sent to prison, and justice seemingly served. Another reason was to respond to a system they perceive to be overly sympathetic toward offenders, while neglectful of victims and which ignores the common sense and the expected guilt of offenders. These two circumstances are conceptually related to the challenge style, where the detective is motivated by the need to seek justice for the victim and rid the organization or the community of offenders.

- *Thinking style 3: Investigation as skill.* Detectives describe this way of thinking as a “skill” that requires a set of personal qualities and abilities that revolve around the central skill of relating effectively to a diversity of people at a number of different levels throughout an investigation. A detective who employs the skill

style is successful at relating to and building relationships with others in order to ensure successful prosecution of a suspect.

Relationships are built with witnesses, whistle-blowers, victims, suspects, and managers. In the case of police investigations, relationships are built with people in the criminal justice system, such as magistrates, judges, and juries. In the case of private investigations, relationships are built with the client, various internal and external information sources, as well as others involved in the investigation. In order to relate to the various individuals, the detective is required to master several abilities, such as communication, personal flexibility, investigative focus, and emotional detachment. The skill style is grounded by the notion of information as the lifeblood of an investigation, and the presumption is that most of the important investigative information comes from communicating with others.

A detective has to be able to share and trade information with individuals who might be useful to the investigation. Sometimes there is a need to turn a blind eye in order to gather important case-related information. It is important to be persistent yet fair. The detective needs to approach investigative interviewing with an open mind. Sometimes a detective needs to display a certain level of warmth, flexibility, and emotion in order to successfully communicate and retrieve important information. In this regard Tong (2009b) discussed the craft of detective work, which emphasizes the importance of understanding and being able to relate to others. It is important to be able to deal with individuals from a range of backgrounds, and it is also critical when questioning individuals who are suspected of having some form of mental illness, intellectual disability, or personality disorder (Herrington and Roberts, 2012).

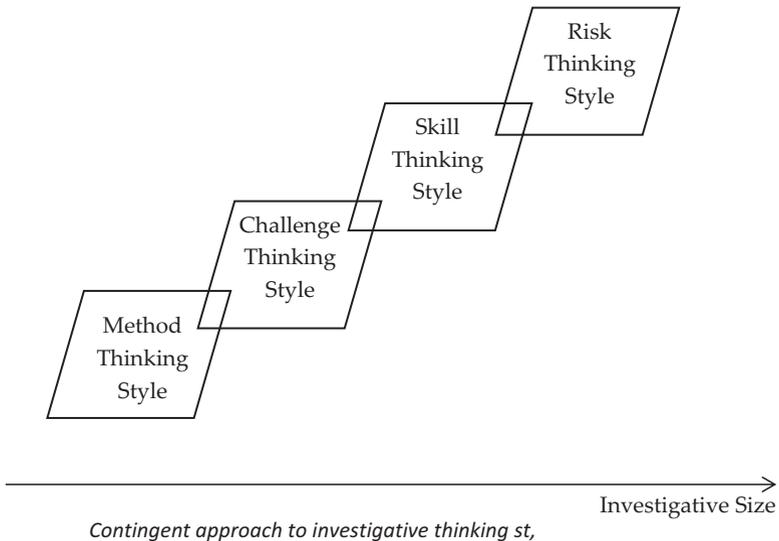
- *Thinking style 4: Investigation as risk.* Detectives describe this way of thinking as taking a “risk” that must be legally justifiable, in order to be proactive through the use of creativity in discovering and developing information into evidence. By taking proactive risks, the detective aims to create new leads. This proactivity revolves around three investigative processes: creativity (the creation of new/different ideas), discovery (of relevant and important information), and development (of information into knowledge and evidence). The risk style is particularly useful in protracted and complex investigations whereby strict adherence to the method style has been unfruitful.

The risk thinking style is underpinned by the notion of taking justified risk. Risks taken by detectives must be legally justifiable, logical (make sense as pertaining to the rest of the investigation), and laterally justified (i.e., be economically and conceptually practicable). By taking proactive risks, the detective aims to create new leads. This proactivity revolves around three investigative processes: creativity (the creation of new and different ideas), discovery (of relevant and important information), and development (of information into knowledge and evidence).

Risk thinkers demonstrate creativity in their investigative approaches. Creativity and intuition are perceived as essential qualities of any criminal investigator. Fictional characters such as Sherlock Holmes have worked to further entrench these

notions of the “born detective” who is naturally creative and intuitive. Detectives can be creative in their job by generating new ways of performing their work, by coming up with novel procedures and innovative ideas, and by reconfiguring known approaches into new alternatives.

Detectives emphasizing the risk style tend to be entrepreneurs, who are characterized to see possibilities and openings where others see problems and locked doors, based on their intuition (Tong, 2009a). Generally, an entrepreneur is a person who operates a new unit or venture and assumes some accountability for the inherent risk. It is a person who takes the risks involved to undertake a procedural venture. Entrepreneurship is the practice of starting new investigative steps or revitalizing mature procedures in response to identified opportunities.



Sometimes investigation can remind of a production line, where cases are investigated after each other, in a routine fashion (Corsianos, 2003: 305):

Detective work tends to parallel an assembly line; that is, detectives routinely process one case after the other with little or no difference in officers’ investigative approaches and/or attitudes towards cases. But, police decision making and officers’ overall treatment of cases are significantly influenced in specific situations. Specific factors such as the time and energy dedicated to solving the crime, the number of officers, technology, budget, and police attitudes towards the accused and officers’ perception as to the seriousness of the case affect the investigation.

In the production line, experienced detectives are able to discern good from bad information intuitively and at the same time be creative in their approach to investigation. Historically, investigation has been thought of as an art form resembling thinking style 4, because it is difficult to articulate and exists beyond procedures and protocols taught to recruits and novice detectives. The qualities that make a good investigator go beyond academic degrees, specialized training, or book learning,

because all the theory in the world means nothing if the detective cannot read an organization in search of white-collar crime. In this respect, Tong (2009a) highlights the need to capture and articulate the qualities of the artistic and intuitive investigator so that they may be passed on.

Thinking styles can be viewed in a hierarchical continuum as illustrated in the figure.

Investigative complexity and time taken to complete investigation require more advanced thinking styles. This does not necessarily reflect the idea that one thinking style is better than another style. Instead, thinking styles are more or less appropriate depending upon complexity and time for investigation. While a less complex and new investigation might be solved using only the method style, a more complex and/or a more time-consuming investigation will require the challenge, skill, or risk styles or a combination of these. This represents a contingent approach to investigative thinking styles, where the appropriateness of a thinking style is dependent on the investigative situation.

Investigative instinct is very important in conducting complex fraud examinations. Coburn (2006) argues that investigators tend to ignore other possibilities because there is no evidence, rather than using instinct to lead them to evidence. It is important to think outside the square.

## Evaluation of Investigations

An investigation report written by fraud examiners should always be evaluated by the client. Here are some characteristics of an evaluation:

- Evaluation is a systematic study of work done or work in progress.
- Evaluation is an objective assessment of activities.
- Evaluation implies assessing or estimating the value of something.
- Evaluation involves analyzing to determine if the investigation did what it was intended to do and if the investigation had expected impact.
- Evaluation is a planned process where the goal is to develop knowledge that is sufficient to judge a completed fraud examination.
- Evaluation applies predefined and explicit criteria.
- Evaluation follows in the aftermath of activities.
- Evaluation can be formative versus summative, goal-oriented versus process-oriented, self-performed versus stranger-performed, etc.

It is certainly interesting to study the quality of investigations and investigation results. The solving of cases – meaning that examiners really found out what had happened and were able to document it – is an interesting issue to study. The extent to which witnessing evidence supports answers varies greatly depending on methodology, experience, and personal qualities including thinking styles among private investigators. One hypothesis might be that many of the investigations could have had a completely different outcome with another and perhaps more qualitative

investigation method based on advanced styles of thought. Some investigations seem to be carried out almost as a judicial process with witnesses similar to a main hearing in court. Often, a lot of documents are reviewed without any clear purpose of evidence production. Such a process is not at all suitable for solving most internal investigation cases. There are rarely new facts appearing during the main hearing in a criminal court case. It is the professionally qualified investigation that has brought forward facts and evidence that eventually may be presented to a court.

Evaluation is the systematic inquiry into a completed investigation involving data collection, analysis, and assessment of work carried out in completed investigation work. It is an objective assessment of activities. Evaluations are always carried out subsequently. It is all about to describe and assess activities that have taken place. The assessment involves that the evaluator appreciates findings resulting from data analysis based on specific criteria. The assessment can be done by comparing the findings with an ideal or goal, such as the mandate and the problem formulation, as well as with criteria for good investigative practice. It should be considered whether the investigation has been successful in finding the truth and clarifying the facts. It should also be considered whether the investigation has been going on in a professional manner. Furthermore, it should be considered whether the investigation has added value in terms of benefits exceeding costs.

An evaluation should meet certain quality requirements, such as openness about sources, triangulation of information (confirmed by several sources), documentation, and conclusion. The design (starting point), implementation (work process), conclusions (work result), workload (resource consumption), as well as investigation impact (consequences) should become subject to evaluation.

Evaluation is about judging the conducted investigation. An evaluator has to ask the critical question of whether or not the investigation was useless and worthless and whether the investigation was improper and unprofessional. An evaluator has to ask whether the investigation was biased as a commission.

An evaluator must make a clear distinction between evaluation criteria and evaluation, for which criteria apply. An evaluation starts by developing criteria for evaluation of the work performed, where both general criteria concerning private internal investigations and specific criteria concerning this particular situation are introduced.

Colloquially, the term evaluation is used to describe assessment and estimation of the value of something. In the literature, an evaluation is a systematic process, it is planned and purposeful, and the purpose is to develop knowledge for assessment. To evaluate is to describe and assess. The description occurs within a framework that specifies procedures for data collection, analysis, and drawing conclusions from the data. The assessment involves appreciating findings from data analysis based on predefined criteria.

An evaluation is both about goal and process. Measuring goal achievement is an inquiry into whether or not one or more objectives have been reached. Goals are defined in the investigation mandate and in expectations from stakeholders. Measuring process performance is a matter of assessing activities that have been

carried out from start to finish. The process involves, among others, honesty, openness, integrity, professionalism, responsibility, and accountability.

The typical overall purpose of evaluation of an investigation is to find out whether the project was successful.

Evaluation of an investigation is concerned with application of many of the same sources of information and methods that were used in the investigation itself. For example, informants for investigators may also be useful for evaluators.

Typically, evaluation of internal investigation reports will apply criteria such as:

- Empirical evidence due to forensic analysis that indeed points to a certain person/group within the company.
- Organization of investigative process with level of detailed description of every step.
- Extent of unbiased conclusions at every point of investigation.
- Extent of clearly stated goals.
- Extent of strong methodology that is stated in detail.
- Statement of conclusions: detail in explanation of how they came to that conclusion.
- Lack of ambiguity in contract and mandate.
- Results in line with mandate.
- Proof of findings.
- Thoroughness in documentation of actions taken during investigation.
- Identifying potential conflicts of interest (i.e., does mandate restrict investigation from pursuing leads?).
- Sources: how many different sources did investigators use to evaluate the same information? How many different types of sources were applied (letters, interviews, financial statements, etc.)?
- Evidence of preconception: does the report contain clues to the fact that the investigator had a specific theory or end result in mind when he/she started the investigation?
- Extent of independence between data gathering and data analysis or different groups doing both.
- Extent to which investigators were building up a solid case where previous history of that specific company is detailed.
- Ability to link all suspected individuals from the past with the current ones.

An evaluation of internal investigations will typically emphasize the starting point, the work process, the process result, the resource consumption, the investigation mandate, the investigative strategies, the work frame, the follow-up actions, and the social responsibility.

*The Starting Point* How well and suited was the starting point for the investigation? Was the mandate clearly articulated? Was the mandate focused rather than diffuse? Was the mandate appropriate to clarify the matter? Were activities in the investigation clearly defined in the mandate? Were targets of the investigation clearly defined in the mandate or elsewhere? How might the starting point have been improved?

Was there anyone who had a hidden agenda? Was the assignment rooted in a dynamic principal, who was willing and ready to take the consequences of the investigation?

*The Work Process* How well was the investigation conducted? How well did the chosen strategies work: information strategy, knowledge strategy, methodology strategy, configuration strategy, and system strategy? How well was contradiction safeguarded and self-incrimination avoided? How might the work process have been improved? Was impartiality considered and avoided? Was confidentiality handled in a proper manner? Have investigators received confidential information and handled it accordingly?

*The Process Result* What is the quality of results from the investigation? Is there any news in the investigation report? Did investigators discover what had actually happened? Who had done what and how and why? Did investigators answer all questions? Is everything in the mandate performed? Are all targets in the mandate reached? Is the investigation report understandable and useful to the principal? Are mentioned persons in agreement with presentations of themselves in the report? How might work results become even better? Are recommendations from the investigation possible to implement? Are recommendations followed up? Did the investigation have consequences for something or someone? What value can be assigned to this investigation? What effects did this investigation have? How successful was the investigation project? Does the investigation report contain errors and inaccuracies? Does the investigation report contain discussion of possible crime matters for which the suspect was never charged? To increase the credibility and transparency of an investigation report, it is important to describe explicitly the choice of methods and procedures; is it done? Credibility is created when a different investigator is able to arrive at the same result when following the same procedure with the same documentation – is this possible with the current investigation report?

*The Resource Consumption* How big was the consumption of resources by the investigation? Was the project kept within agreed cost limit and time frame? Were relevant skills used in the investigation? Resource is a term that implies making something possible. A resource is an enabler. What resources were applied in the form of knowledge? What resources should have been applied in the form of knowledge? How might the consumption of resources have been reduced?

*The Investigation Mandate* Does the mandate seem suitable for the situation without any traces of bias or blame game? Is the mandate formulation clear, understandable, focused, and verifiable? Does the client seem really interested in the investigation and eager to learn about results? Are tasks in the investigation carried out in line with the mandate? Have all questions and issues in the mandate been answered?

*The Investigative Strategies* Did investigators select appropriate information strategy, knowledge strategy, methodology strategy, configuration strategy, and systems strategy?

The work frame. Have investigators enjoyed a reasonable work frame in the client organization? Have issues such as the right of contradiction, the protection against self-incrimination, and written proceedings been addressed?

*The Follow-up Actions* Has the client followed up on conclusions presented in the investigation report? Why or why not? Did the investigation result in relevant consequences for activities and people?

*The Social Responsibility* Do investigators take on social responsibility? Social responsibility is to share information with authorities, to compensate for own adverse effects (e.g., accused someone of something which later turned out to be wrong), to compensate for the client's adverse effects (e.g., such as baseless suspicions), to show transparent operations (which others can gain insights into), and to demonstrate professionalism (accountability, objectivity, and integrity).

### Discussion Questions

1. What are major challenges when investigating white-collar crime?
2. What are major challenges in private investigations by fraud examiners?
3. How would you describe a successful white-collar crime investigation?
4. Why do organizations hire fraud examiners for internal investigations?
5. What kinds of knowledge are needed to be a successful fraud examiner?
6. What are differences between police and private investigations?
7. What thinking style is most appropriate for white-collar crime investigations?
8. How would you evaluate a private internal investigation?
9. How would you define information strategy, knowledge strategy, methodology strategy, configuration strategy, and systems strategy?
10. What is meant by social responsibility?

### References

- ACFE. (2008). *2008 Report to the Nation – On Occupational Fraud & Abuse*, Association of Certified Fraud Examiners, Austin, TX.
- ACFE. (2014). *Report to the Nations on Occupational Fraud and Abuse, 2014 Global Fraud Study*, Association of Certified Fraud Examiners, Austin, TX.
- ACFE. (2016). *CFE Code of Professional Standard*, Association of Certified Fraud Examiners, [www.acfe.com/standards/](http://www.acfe.com/standards/)
- Anders, S. B. (2006). Website of the month: Association of Certified Fraud Examiners. *The CPA Journal*, 71.
- Brooks, G., & Button, M. (2011). The police and fraud investigation and the case for a nationalized solution in the United Kingdom. *The Police Journal*, 84, 305–319.
- Button, M., Frimpong, K., Smith, G., & Johnston, L. (2007). Professionalizing counter fraud specialists in the UK: Assessing progress and recommendations for reform. *Crime Prevention and Community Safety*, 9, 92–101.
- Carson, D. (2013). Investigations: What could, and should, be taught? *The Police Journal*, 86(3), 249–275.
- CFCS. (2013). *CFCS certification examination study manual* (4th ed.). Miami, FL: Certified Financial Crime Specialist, Association of Certified Financial Crime Specialists.

- Coburn, N. F. (2006). Corporate investigations. *Journal of Financial Crime*, 13(3), 348–368.
- Corsianos, M. (2003). Discretion in detectives' decision making and 'high profile' cases. *Police Practice and Research*, 4(3), 301–314.
- Dean, G. (2005). *The Cognitive Psychology of Police Investigators*. Conference paper, School of Justice Studies, Faculty of Law, Queensland University of Technology, Brisbane, Australia.
- Dupont, B. (2014). Private security regimes: Conceptualizing the forces that shape the private delivery of security. *Theoretical Criminology*, 18(3), 263–281.
- Gill, M., & Hart, J. (1997). Exploring investigative policing. *British Journal of Criminology*, 37(4), 549–567.
- Goldschmidt, J., & Anonymous. (2008). The necessity of dishonesty: Police deviance, 'making the case' and the public good. *Policing and Society*, 18(2), 113–135.
- Gottschalk, P. (2016). Blame game and rotten apples in private investigation reports: The case of Hadeland and Ringerike Broadband in Norway. *Journal of Investigative Psychology and Offender Profiling*, 13, 91–109.
- Green, B. A., & Podgor, E. (2014). Unregulated internal investigations: Achieving fairness for corporate constituents. *Boston College Law Review*, 54(1), 73–126.
- Herrington, V., & Roberts, K. (2012). Addressing psychological vulnerability in the police suspect interview. *Policing*, 6(2), 177–186.
- Kennedy, D. B. (2013). Applications of forensic sociology and criminology to civil litigation. *Journal of Applied Social Science*, 5, 33.
- Kessler, R. (2012). *The secrets of the FBI*. New York, NY: Broadway Paperbacks, Random House.
- Machen, M. J., & Richards, R. E. (2004). The use of fraud examiners in the battle against occupational fraud and abuse. *The Journal of Investment Compliance*, Winter, 67–71.
- Meerts, C. (2014). Empirical case studies of corporate security in international perspective, in: Walby, K. and Lippert, R.K. (editors), *Corporate security in the 21st century – Theory and practice in international perspective*, Palgrave Macmillan: Hampshire, Houndmills, UK, 97–115.
- Morgan, M., & Nix, W. (2003). CPA perceptions of the marketability, career enhancements and quality of Services of Certified Fraud Examiners. *The Southern Business and Economic Journal*, 31–50.
- Osterburg, J. W., & Ward, R. H. (2014). *Criminal investigation: A method for reconstructing the past* (7th ed.). Waltham, MA: Anderson Publishing.
- Schneider, S. (2006). Privatizing economic crime enforcement: Exploring the role of private sector investigative agencies in combating money laundering. *Policing & Society*, 16(3), 285–312.
- Siegel, L. (2009). *Introduction to criminal justice*. California: Wadsworth Cengage Learning.
- Staines, Z. (2013). Managing tacit investigative knowledge: Measuring "investigative thinking styles". *Policing: An International Journal of Police Strategies & Management*, 36(3), 604–619.
- Tong, S. (2009a). Introduction: A brief history of crime investigation. In S. Tong, R. Bryant, & M. Hovath (Eds.), *Understanding criminal investigation* (pp. 1–10). Chichester: Wiley & Sons.
- Tong, S. (2009b). Professionalising investigation. In S. Tong, R. Bryant, & M. Hovath (Eds.), *Understanding criminal investigation* (pp. 197–216). Chichester: Wiley & Sons.
- Wells, J. T. (2003). The fraud examiners. *Journal of Accountancy*, October, 76–80.
- Williams, J. W. (2005). Governability matters: The private policing of economic crime and the challenge of democratic governance. *Policing & Society*, 15(2), 187–211.
- Williams, J. W. (2014). The private eyes of corporate culture: The forensic accounting and corporate investigation industry and the production of corporate financial security. In K. Walby & R. K. Lippert (Eds.), *Corporate security in the 21st century – Theory and practice in international perspective* (pp. 56–77). Hampshire, Houndmills, UK: Palgrave Macmillan.