



The following documentation is an electronically-submitted vendor response to an advertised solicitation from the *West Virginia Purchasing Bulletin* within the Vendor Self-Service portal at [wvOASIS.gov](http://wvOASIS.gov). As part of the State of West Virginia's procurement process, and to maintain the transparency of the bid-opening process, this documentation submitted online is publicly posted by the West Virginia Purchasing Division at [WVPurchasing.gov](http://WVPurchasing.gov) with any other vendor responses to this solicitation submitted to the Purchasing Division in hard copy format.

Header @ 1

List View

- General Information**
- Contact
- Default Values
- Discount
- Document Information
- Clarification Request

Procurement Folder: 1077957

Procurement Type: Central Master Agreement

Vendor ID: VS0000012910

Legal Name: SPECIALTY AUDIT SERVICES LLC

Alias/DBA:

Total Bid: \$2.00

Response Date: 09/07/2022

Response Time: 9:02

Responded By User ID: sasaudit

First Name: Michael

Last Name: Danowitz

Email: mdanowitz@sasaudit.co

Phone: 610-617-0452

SO Doc Code: CRFQ

SO Dept: 1300

SO Doc ID: STO2300000001

Published Date: 8/30/22

Close Date: 9/7/22

Close Time: 13:30

Status: Closed

Solicitation Description: Addendum No.4 Audit Services for Unclaimed Property

Total of Header Attachments: 1

Total of All Attachments: 1



Line	Comm Ln Desc	Qty	Unit Issue	Unit Price	Ln Total Or Contract Amount
1	Audit services				1.00

Comm Code	Manufacturer	Specification	Model #
84111600			

**Commodity Line Comments:** 10.5%

**Extended Description:**

Audit/Collection of Property per section 4.1.21 of Specifications. Rate shall not exceed 10.5% Vendor must enter their percentage and affirmation on Exhibit A Pricing Page and return with their bids.

Line	Comm Ln Desc	Qty	Unit Issue	Unit Price	Ln Total Or Contract Amount
2	Audit services				1.00

Comm Code	Manufacturer	Specification	Model #
84111600			

**Commodity Line Comments:** 9%

**Extended Description:**

Audit / Voluntary Compliance Program per section 4.2.10 of Specifications. Rate shall be flat rate of 9% Vendor must enter their percentage and affirmation on Exhibit A Pricing Page and return with their bids.

Line	Comm Ln Desc	Qty	Unit Issue	Unit Price	Ln Total Or Contract Amount
3	Audit services	0.00000	HOUR	1.000000	0.00

Comm Code	Manufacturer	Specification	Model #
84111600			

**Commodity Line Comments:** \$100/hour

**Extended Description:**

Audit /Other Services per section 4.3.1 of Specifications. Rate shall not exceed \$100 per hour. Vendor must enter their hourly rate and affirmation on Exhibit A Pricing Page and return with their bids.

August 15, 2022

Bid Clerk  
Department of Administration  
Purchasing Division  
2019 Washington Street East  
Charleston, WV 25305-0130

Submitted via WVOasis  
RE: Solicitation Number CRFQ1300 STO2300000001 for Audit Services for Unclaimed Property

To Whom It May Concern:

Specialty Audit Services, LLC ("SAS") is pleased to submit this proposal indicating our qualifications and willingness to perform unclaimed property auditing services for the West Virginia State Treasurer's Office, Solicitation Number CRFQ1300 STO2300000001 for Audit Services for Unclaimed Property issued on August 2, 2022.

SAS works to promote objectivity, accountability, and transparency in each of our state contracts to identify and collect unclaimed property. We consistently apply this philosophy in all of our exams and will continue to do so if our contract is renewed by the West Virginia State Treasurer's Office.

SAS's contact information and designated person authorized to represent SAS regarding all matters related to this proposal is as follows:

Michael Danowitz, Principal  
Specialty Audit Services, LLC  
724 Montgomery Avenue  
Narberth, PA 19072  
Email: [mdanowitz@sasaudit.com](mailto:mdanowitz@sasaudit.com)

Please find our proposal, including our experience, qualifications, and methodology.

If you have any questions or require additional information, please contact me at (610) 617-0452, extension 105.

Very truly yours,



Michael Danowitz  
Principal



**RESPONSE TO REQUEST FOR  
QUALIFICATIONS  
WEST VIRGINIA STATE TREASURER'S OFFICE**

SOLICITATION NUMBER CRFQ1300 STO2300000001  
AUDIT SERVICES FOR UNCLAIMED PROPERTY

PRESENTED BY: MICHAEL DANOWITZ  
SPECIALTY AUDIT SERVICES, LLC  
724 MONTGOMERY AVENUE, NARBERTH, PA 19072  
(610) 617-0452 X 105  
MDANOWITZ@SASAUDIT.COM

## TABLE OF CONTENTS

DESIGNATED CONTACT.....	4
ADDENDUM ACKNOWLEDGEMENT FORM.....	5
3.0 QUALIFICATIONS.....	6
3.1 KNOWLEDGE.....	6
3.2 ORGANIZATION .....	6
3.3 LOCATION.....	7
3.4 QUALITY CONTROL REVIEW .....	7
3.5 INTERNAL CONTROLS, SECURITY AND TECHNOLOGY.....	7
3.6 REFERENCES.....	8
3.7 EXPERIENCE.....	9
EXAMPLES.....	10
CURRENT CLIENTS.....	12
3.8 STANDARDS.....	16
3.9 STAFF QUALIFICATIONS.....	17
4.1.1 SPECIFIC WORK PLAN – AUDITS (METHODOLOGY).....	30
SAS ATTACHMENT #1 – PRELIMINARY IDR.....	39
SAS ATTACHMENT #2 – IDR INVENTORY TRACKER.....	43
SAS ATTACHMENT #3 – ENTITY MATRIX.....	45
SAS ATTACHMENT #4 – AUP FILING MATRIX.....	48
SAS ATTACHMENT #5 – BANK ACCOUNT MATRIX.....	50
SAS ATTACHMENT #6 – DISBURSEMENT UNIVERSE.....	52
SAS ATTACHMENT #7 – AUDIT WORKPLAN.....	54
WV EXHIBIT A: PRICING PAGE.....	56

**DESIGNATED CONTACT:** Vendor appoints the individual identified in this Section as the Contract Administrator and the initial point of contact for matters relating to this Contract.

(Name, Title)  Principal  
(Printed Name and Title) Michael Danowitz, Principal  
(Address) 724 Montgomery Avenue, Narberth, PA 19072  
(Phone Number) / (Fax Number) (610) 617-0452 / (610) 617-0459  
(email address) mdanowitz@sasaudit.com

**CERTIFICATION AND SIGNATURE:** By signing below, or submitting documentation through wvOASIS, I certify that: I have reviewed this Solicitation/Contract in its entirety; that I understand the requirements, terms and conditions, and other information contained herein; that this bid, offer or proposal constitutes an offer to the State that cannot be unilaterally withdrawn; that the product or service proposed meets the mandatory requirements contained in the Solicitation/Contract for that product or service, unless otherwise stated herein; that the Vendor accepts the terms and conditions contained in the Solicitation, unless otherwise stated herein; that I am submitting this bid, offer or proposal for review and consideration; that I am authorized by the vendor to execute and submit this bid, offer, or proposal, or any documents related thereto on vendor's behalf; that I am authorized to bind the vendor in a contractual relationship; and that to the best of my knowledge, the vendor has properly registered with any State agency that may require registration.

*By signing below, I further certify that I understand this Contract is subject to the provisions of West Virginia Code § 5A-3-62, which automatically voids certain contract clauses that violate State law; and that pursuant to W. Va. Code 5A-3-63, the entity entering into this contract is prohibited from engaging in a boycott against Israel.*

Specialty Audit Services, LLC  
(Company)  
 Michael DANOWITZ, Principal  
(Authorized Signature) (Representative Name, Title)  
Michael Danowitz, Principal, August 15, 2022  
(Printed Name and Title of Authorized Representative) (Date)  
(610) 617-0452 / (610) 617-0459  
(Phone Number) (Fax Number)  
mdanowitz@sasaudit.com  
(Email Address)

**ADDENDUM ACKNOWLEDGEMENT FORM  
SOLICITATION NO.:**

Instructions: Please acknowledge receipt of all addenda issued with this solicitation by completing this addendum acknowledgment form. Check the box next to each addendum received and sign below. Failure to acknowledge addenda may result in bid disqualification.

Acknowledgment: I hereby acknowledge receipt of the following addenda and have made the necessary revisions to my proposal, plans and/or specification, etc.

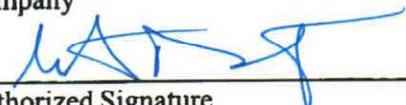
Addendum Numbers Received:

*(Check the box next to each addendum received)*

- |                                                    |                                          |
|----------------------------------------------------|------------------------------------------|
| <input checked="" type="checkbox"/> Addendum No. 1 | <input type="checkbox"/> Addendum No. 6  |
| <input checked="" type="checkbox"/> Addendum No. 2 | <input type="checkbox"/> Addendum No. 7  |
| <input checked="" type="checkbox"/> Addendum No. 3 | <input type="checkbox"/> Addendum No. 8  |
| <input checked="" type="checkbox"/> Addendum No. 4 | <input type="checkbox"/> Addendum No. 9  |
| <input type="checkbox"/> Addendum No. 5            | <input type="checkbox"/> Addendum No. 10 |

I understand that failure to confirm the receipt of addenda may be cause for rejection of this bid. I further understand that any verbal representation made or assumed to be made during any oral discussion held between Vendor's representatives and any state personnel is not binding. Only the information issued in writing and added to the specifications by an official addendum is binding.

Specialty Audit Services, LLC  
Company

  
Authorized Signature

8/15/2022  
Date

NOTE: This addendum acknowledgment should be submitted with the bid to expedite document processing.

## 3.0 QUALIFICATIONS

---

### 3.1 KNOWLEDGE

SAS has sufficient knowledge of the *West Virginia Unclaimed Property Act* (the “Act”), set forth in *W. Va. Code §36-8-1, et seq.*, court rulings regarding the Act, and its regulations. SAS will comply with the Act and correctly apply the law to the Holder examination.

---

### 3.2 ORGANIZATION

Founded in 2004 by Michael Danowitz and Jason Gordon, SAS has conducted unclaimed property examinations for over seventeen years. During that time, SAS has examined entities ranging from simple single-structure companies to complex entities with nearly 1,000 subsidiaries. Additionally, SAS has reviewed Holders with annual revenue ranging from \$500 million to as much as \$75 billion. SAS’s methodology involves using our industry-specific knowledge to determine areas of potential abandoned or unclaimed property.

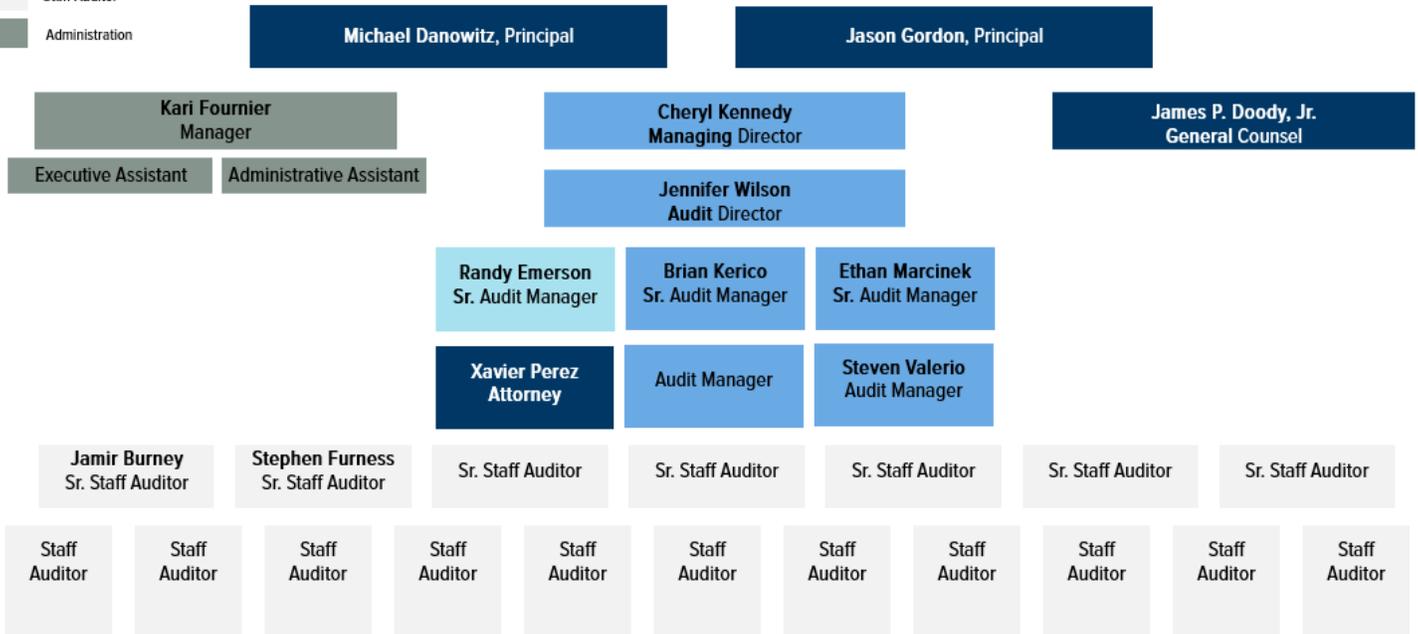
SAS currently maintains two Principals, one General Counsel, and one Managing Director. These four SAS members run the day-to-day operations of SAS, coordinating internally and externally with a variety of stakeholders. SAS’s small size, in conjunction with the flexibility of an LLC entity structure, means that major decisions can be made regularly and efficiently. SAS focuses its corporate governance on aligning its strategies with its goals, making its Principals and team members—of all levels—accountable, maintaining a high level of ethics and integrity, and managing risk effectively. Although SAS maintains a lean operation, SAS’s more than 25 client states (“Client States”) benefit from SAS’s one-on-one, tailored examination methodology. Further, SAS’s size provides an opportunity for all team members to take an interest in the complex work performed. Similarly, Client States are afforded top-notch examination results without the burden of employing a substantial workforce. SAS is adept and effective at managing examinations that range from single-entity Holders to Fortune 100 Holders.

In addition to the leadership team above, SAS has one Audit Director, three Senior Audit Managers, two Audit Managers, seven Senior Staff Auditors, eleven Staff Auditors, three Administrators, and one Attorney. The entirety of the Professional Staff at our firm is dedicated to performing unclaimed property examination services on behalf of state governments. SAS is continuing to grow our talent pool with a diverse group of experienced professionals that will provide additional value to our clients.

Our Organization Chart below provides not only our hierarchy, but also identifies SAS Attorneys, Audit Managers, Staff Auditors, and Administrators. Additional details regarding the expertise of key persons can be found in the resumes provided in Section 3.9 under Staff Qualifications.

- Attorney
- CFE
- Audit Manager
- Staff Auditor
- Administration

## SPECIALTY AUDIT SERVICES, LLC Organization Chart



SAS's headquarters, and sole office, is located at 724 Montgomery Avenue, Narberth, PA 19072. Before March 2020, examinations were conducted both on-site and off-site by SAS, as approved by the State, of entities of all sizes and industries. Since the Spring of 2020, SAS has worked completely remotely and has continued to conduct its multistate examinations off site.

### 3.3 LOCATION

SAS is currently licensed to conduct business and is in good standing with all regulatory and governmental authorities in all states for which the firm conducts abandoned or unclaimed property examinations. Additionally, SAS always stores, processes and maintains data for all Client States, and third-parties under audit, within the continental United States.

### 3.4 QUALITY CONTROL REVIEW

SAS maintains a quality control system to ensure error-free processing and reporting of Holder data. SAS's quality controls require that all reports undergo multiple reviews by management before submission to Holders or our state clients. SAS complies with all applicable state, federal, and local laws and regulations regarding confidentiality, privacy, and security of confidential information.

### 3.5 INTERNAL CONTROLS, SECURITY AND TECHNOLOGY

SAS takes its duty and obligation to safeguard confidential examination information very seriously. To ensure that SAS exceeds the expectations of the State and all its clients, each SAS team member undergoes a rigorous orientation, including periodic refreshers, to understand the confidential nature of examining Holders, including the records associated with each examination. SAS requires all team members to sign

a confidentiality and non-disclosure agreement indicating an understanding of the importance of these issues, including an agreement not to disclose the name of any Holder being examined.

As part of SAS's internal controls to ensure compliance with the terms of our contracts, as well as associated state and federal security measures to safeguard data, SAS employs a third-party Managed Services Provider (MSP), to handle these functions. All of SAS's systems (e.g., computers) are monitored by this MSP. Further strengthening SAS's adherence to security and confidentiality, all examination files and program source data are backed up daily, and copies are stored off-site for recovery within 24 hours.

Our MSP is currently setting up a secure file transfer method that will be completed and utilized if our contract is renewed, meeting the requirements of this RFQ. All data in transit and at rest is encrypted. As the RFQ is publicly available, details regarding the encryption methods and implementation are not included but are available upon request.

Access to confidential data is managed on a per-user basis. Users are provided with encrypted company laptops and given user credentials. Laptops are preconfigured for as-needed resource access and are audited regularly. Access is centrally managed via our Domain Controller, configured by our MSP, and all administrative access or permission changes are documented. SAS will adhere to a "least privileged" access model.

SAS does not require the usage of any third-party plugins and only commonly used data formats are used to complete audits.

SAS is dedicated to continuing to strengthen its security and confidentiality measures. Recently, SAS has begun both internal and external penetration testing conducted by our MSP, scheduled twice annually. Our MSP also utilizes RMM software which collects event logs from all endpoints including, but not limited to, security auditing, access control, software changes, file access, etc., for live 24/7 vulnerability scans on all endpoints.

To provide greater transparency and certainty relating to SAS's controls, SAS, beginning in 2020, with the help of a third-party auditor, began an annual evaluation of its internal processes, policies, and security to attain System & Organization Controls (SOC) 1 compliance. A copy of the SOC Audit Report is available upon request.

SAS represents and warrants that it will take all necessary and appropriate action to safeguard sensitive or confidential information and to protect such information from unauthorized disclosure. SAS will access sensitive or confidential information only for the purposes for which it is authorized.

SAS's data security infrastructure is reevaluated on an annual basis, or as new information is provided by our MSP.

---

## 3.6 REFERENCES

SAS provides unclaimed property audit services similar in size and scope as described in this RFP for the following client jurisdictions within the last five years. The State may contact any of the contacts to discuss SAS's performance.

## DELAWARE DEPARTMENT OF FINANCE

820 N. French Street, 8th Floor  
Wilmington, DE 19801

Brenda Mayrack, State Escheator/Director, Office of Unclaimed Property

Phone: (302) 577-8891

Email: Brenda.Mayrack@delaware.gov

Length of Relationship: 2004 – Present

## FLORIDA DEPARTMENT OF FINANCIAL SERVICES

Division of Unclaimed Property  
5920 Arlington Expressway, Suite 389A  
Jacksonville, FL 32211

Barry Williams, Compliance Supervisor, Bureau of Unclaimed Property

Phone: (904) 485-9541

Email: Theodore.Williams@myfloridacfo.com

Length of Relationship: 2013 – Present

## TENNESSEE TREASURY DEPARTMENT

Unclaimed Property Division  
P.O. Box 198649  
Nashville, TN 37219

John Gabriel, Director of Unclaimed Property

Kellie Williamson, Manager

Phone: (615) 253-5354

Phone: (615) 253-5342

Email: John.Gabriel@tn.gov

Email: Kellie.Williamson@tn.gov

Length of Relationship: 2015 – Present

---

## 3.7 EXPERIENCE

Established in 2004, SAS has solely conducted abandoned or unclaimed property examinations on behalf of state governments for over seventeen years. SAS has provided unclaimed property examination services identical to those identified by this solicitation for more than 20 states. SAS is presently performing more than 100 unclaimed property examinations on behalf of our Client States.

SAS applies a comprehensive examination methodology that will enhance the State's existing unclaimed property compliance program. SAS will locate, identify, and collect from Holders unclaimed property subject to report and delivery under applicable federal and state laws. In conducting examinations, SAS adheres to the priority rules outlined by the United States Supreme Court in *Texas v. New Jersey*, 379 U.S. 674 (1965) and *Delaware v. New York*, 507 U.S. 490 (1993).

SAS provides objectivity and consistency in all our examinations. SAS uses an approach that documents progress and the Holder's positions on various important examination issues, which ensures an expedited and efficient examination with minimal disruption to the Holder's day-to-day business affairs. Additionally, when discussions concerning important audit issues occur, SAS follows up and provides the Holder with a written review of the items covered during the meeting. SAS aims to identify outstanding issues and ensure

that challenges are dealt with openly, efficiently, and promptly. If needed, SAS will engage and work with a reporting jurisdiction's representatives; however, SAS is fully capable of working independently to address and resolve Holder issues.

SAS's expertise in unclaimed property makes us uniquely adept at adjusting to the changing landscape of the industry. SAS has four attorneys among its team members, including the two Principals. Collectively, this team continually monitors regulatory changes and litigation affecting the unclaimed property industry, changes to reporting jurisdictions' dormancy periods, estimation techniques, and related aspects of the industry. This awareness and expertise aid SAS in effectively carrying out examinations, even when there are shifts in case law and statutes during ongoing examinations. The State can trust that SAS has broad experience resolving an array of examination issues.

An SAS examination includes a proven methodology divided into five phases, which are summarized below.

Phase I includes identification of Holders; mailing of audit letters by participating states; conducting background research; scheduling and attending an in-person or telephonic opening conference; negotiating a non-disclosure agreement; and issuing an initial information and document request ("IDR").

Phase II includes compiling an entity matrix; researching prior Holder actions, such as mergers and acquisitions and bankruptcies; developing an inventory tracker; obtaining Holder confirmation; and reviewing a Holder's internal systems.

Phase III includes creating the universe of transactions to be reviewed; sampling data; examining the availability of Holder records; issuing additional IDRs; validating data; compiling a bank account matrix; interviewing Holder personnel regarding internal systems, if necessary; and obtaining Holder confirmation.

Phase IV includes reviewing remediation support for individual transactions, i.e., examining a Holder's responses and objections to transactions representing potential unclaimed property liabilities.

Lastly, Phase V includes preparing an examination report and a liability calculation, which may incorporate the use of estimation; obtaining Holder confirmation; drafting and reviewing settlement agreements, releases, indemnification, and related agreements for participating states, if applicable; providing additional guidance for Holder compliance for future reporting, if applicable; and delivering and remitting unclaimed property to participating states.

Significant issues that we have encountered and resolved during our examinations include, for example, (i) decentralized accounting functions involving complex multi-entity corporations; (ii) inconsistent records availability among various property types; (iii) merger, acquisition, and divestiture activity affecting the scope of the examination; (iv) changes, upgrades, and consolidation of accounting systems and software; and (v) instances of records destruction because of natural disaster, relocation, or intentional Holder efforts to limit access to records and personnel. SAS's examination methodology varies based upon the unique circumstances of each Holder, but SAS consistently uses a fair and objective approach to complete examinations expeditiously. SAS's examination process is also non-confrontational to the business community.

---

## EXAMPLES

Each of these Holders exemplifies the types of reviews performed by SAS and that may be performed for the State. It is SAS's experience that examination duration varies depending on the complexity of the Holder's organization, the availability of records, and the willingness of the Holder to cooperate with the examination process. It is SAS's goal to work expeditiously to complete examinations, while also ensuring

a thorough review of each Holder. SAS provides a work plan to each Holder at the beginning of the examination that anticipates the examination will be completed within a 24-month time period. The work plan, which is reviewed in detail during the opening conference, guides the exam process and sets forth the various phases that will be followed during the exam. Examination work plans are updated as necessary, but SAS expects the Holder's cooperation to ensure that an examination should not exceed the two-year window. Typically, SAS completes examinations within two years, however, SAS will work at the Holder's pace if the Holder is able and willing to complete the examination expeditiously. With the Holder's cooperation and, if necessary, the State's involvement, examinations will almost always be completed within the timeframes expected by our Client States. In the event a specific examination continues longer than anticipated, SAS maintains an open dialogue with Client States to ensure parties have shared expectations.

### **EXAMPLE 1: MULTI-TIERED MANUFACTURER**

A multi-tiered manufacturer with \$6 billion in annual revenue, approximately 75 operating subsidiaries, and locations throughout the world. The Holder had many different lines of business with varying revenue, disbursements, employees, and customer bases. SAS's approach to this examination was to segregate the Holder's activities into business segments. Additionally, the Holder's accounting functions were very decentralized, with each entity under detailed review maintaining individual accounting systems.

With the Holder's agreement, SAS selected representative entities in each business segment and reviewed those entities in detail. The results of the detailed review were applied to other entities in the applicable business segment to determine the Holder's overall unclaimed property liability to the Client State. SAS completed the examination because of our tailored examination process, whereby each business segment took ownership of its portion of the examination.

### **EXAMPLE 2: VERTICAL MANUFACTURER**

A vertical manufacturer with two main operating companies and \$1 billion in annual revenue. SAS created a detailed testing program for all property types and utilized a sampling methodology, as the Holder's records were unavailable before certain periods. The examination lasted 24 months and was successful because the Holder was motivated to complete the examination promptly, as it had limited resources with its priority being the operation of its business. Records were delivered timely and reviewed in an expedited manner.

### **EXAMPLE 3: RETAIL SERVICE PROVIDER**

A complex provider of services to millions of retail customers nationwide with over \$40 billion in annual revenue. The Holder consisted of over 900 operating entities and multiple business segments. The examination required SAS to implement a complex methodology to determine the examination's scope. This Holder had more than 50,000 employees and 75,000 vendors, as well as millions of active and inactive customers. The examination was further complicated because the Holder was created through a series of mergers, which led to multiple accounting software systems being used by the different business units. SAS worked with the Holder's attorneys, accountants, and unclaimed property consultants to create the examination methodology and to conduct a review of the books and records of each entity identified for detailed testing. SAS used extrapolation and estimation to determine the Holder's overall liability within the work plan timeline.

### **EXAMPLE 4: NATIONAL RETAILER**

Examination of a national retailer with thousands of locations and over \$10 billion in annual revenue. During the examination, SAS faced many challenges including Holder transactions (the Holder was sold twice and acquired several other entities), changes in Holder personnel (as individuals were restructured or downsized), and changes in advocacy firms. Despite periods when the Holder and its advocates were not responsive, SAS managed to obtain accounting and financial records on-site, even when the Holder indicated resources were not available to obtain those records. SAS provided populations of transactions

for review and managed to close the examination with significant findings of reportable unclaimed property in a timely manner.

### **EXAMPLE 5: DUAL OPERATING MANUFACTURER**

This examination involved a general ledger review of a manufacturer with two main operating companies and \$750 million in annual revenue. Initially, the Holder contended that its accounting records were limited in scope due to systems conversions and changes in Holder personnel. However, after continued inquiries and involvement of senior accounting officers, the Holder located detailed records that extended back to the beginning of the examination lookback period. SAS created a testing program for all property types and reviewed every year of the Holder's in-scope records. Also, SAS identified various general ledger accounts for detailed review as the Holder wrote off credits to a general ledger account. As part of the examination, items were reunited with the appropriate owners, and additional property was properly reported to the appropriate jurisdictions following the agreed upon work plan.

---

### **CURRENT CONTRACTS**

SAS provides both general ledger and securities unclaimed property audit services similar in size and scope as described in this RFP for the following client jurisdictions.

#### **ARIZONA DEPARTMENT OF REVENUE**

Will Nagel, Unclaimed Property Administrator  
1600 West Monroe Street  
Phoenix, AZ 85007-2650  
Phone: (602) 716-6033  
Email: [WNagel@azdor.gov](mailto:WNagel@azdor.gov)  
Length of Relationship: 2015 – Present

#### **COLORADO DEPARTMENT OF THE TREASURY**

Garth Farrend, Audit Manager  
200 E. Colfax Ave  
Room 141  
Denver, CO 80203  
Phone: (303) 866-6043  
Email: [Garth.Farrend@state.co.us](mailto:Garth.Farrend@state.co.us)  
Length of Relationship: 2021 - Present

#### **DELAWARE DEPARTMENT OF FINANCE**

Brenda Mayrack, State Escheator/Director, Office of Unclaimed Property  
820 N. French Street, 8th Floor  
Wilmington, DE 19801  
Phone: (302) 577-8891  
Email: [Brenda.Mayrack@delaware.gov](mailto:Brenda.Mayrack@delaware.gov)  
Length of Relationship: 2004 – Present

#### **FLORIDA DEPARTMENT OF FINANCIAL SERVICES**

Barry Williams, Compliance Supervisor, Bureau of Unclaimed Property  
5920 Arlington Expressway  
Suite 389A  
Jacksonville, FL 32211  
Phone: (904) 485-9541  
Email: [Theodore.Williams@myfloridacfo.com](mailto:Theodore.Williams@myfloridacfo.com)  
Length of Relationship: 2013 – Present

## STATE OF IDAHO, OFFICE OF THE TREASURER

Ingrid Bolen, Administrator, Idaho Unclaimed Property  
700 W. Jefferson St  
Suite E-126  
Boise, ID 83702  
Phone: (208) 332-2978  
Email: Ingrid.Bolen@sto.idaho.gov  
Length of Relationship: 2020 – Present

## TREASURER OF THE STATE OF ILLINOIS

Alina Archibald, Examinations Audit Manager  
Meyers Building – 1 W. Old State Capitol Plaza  
Suite 400  
Springfield, IL 62701  
Phone: (217) 524-0649  
Email: AArchibald@illinoistreasurer.gov  
Length of Relationship: 2005 – 2015, 2019 – Present

## OFFICE OF KENTUCKY STATE TREASURER

Katrina Stoner, Branch Manager, Unclaimed Property Division  
1050 US Hwy 127 South  
Suite 100  
Frankfort, KY 40601  
Phone: (800) 465-4722  
Email: Katrina.Stoner@ky.gov  
Length of Relationship: 2020 – Present

## STATE OF MAINE, OFFICE OF THE STATE TREASURER

Laura J. Hudson, Director of Internal Operations  
39 State House Station  
Augusta, ME 04333  
Phone: (207) 624-7460  
Email: laura.hudson@maine.gov  
Length of Relationship: 2019 – Present

## COMPTROLLER OF MARYLAND

Maheshwar Seegopaul, Manager, Unclaimed Property  
301 West Preston Street  
Room 310  
Baltimore, MD 21201  
Phone: (410) 767-1812  
Email: MSeegoupaul@marylandtaxes.gov  
Length of Relationship: 2019 – Present

## MASSACHUSETTS OFFICE OF THE STATE TREASURER

Judy Franchi, Director of Audit & Compliance  
One Ashburton Place  
12<sup>th</sup> Floor  
Boston, MA 02108  
Phone: (617) 367-9333 extension 412  
Email: Judy.Franchi@state.ma.us  
Length of Relationship: 2014 – Present

## MINNESOTA DEPARTMENT OF COMMERCE

Scott Halvorson, Director of Unclaimed Property  
85 7<sup>th</sup> Place East  
Suite 500  
St. Paul, MN 55101  
Phone: (651) 539-1579  
Email: Scott.T.Halvorson@state.mn.us  
Length of Relationship: 2020 – Present

## MISSOURI STATE TREASURER

Scott Harper, Director of Unclaimed Property  
P.O. Box 1004  
Jefferson City, MO 65102  
Phone: (573) 751-2082  
Email: Scott.Harper@treasurer.mo.gov  
Length of Relationship: 2018 – Present

## MONTANA DEPARTMENT OF REVENUE

Jason Lay, Unit Manager, Miscellaneous Taxes  
PO Box 5805  
Helena, MT 59604  
Phone: (406) 444-1940  
Email: Jason.Lay@mt.gov  
Length of Relationship: 2016 – Present

## TREASURER, STATE OF NEW HAMPSHIRE

Thomas P. McAnespie, Abandoned Property Director  
25 Capitol Street, Room 205  
Concord, NH 03301  
Phone: (603) 271-1499  
Email: TMcAnespie@treasury.state.nh.us  
Length of Relationship: 2019 – Present

## NEVADA OFFICE OF THE STATE TREASURER

Danielle Anthony, Auditor III, Unclaimed Property Division  
Grant Sawyer Building  
Las Vegas, NV 89101  
Phone: (702) 486-8377  
Email: DAnthony@nevadatreasurer.gov  
Length of Relationship: 2022 – Present

## NEW YORK OFFICE OF THE STATE COMPTROLLER

Rob Tambini, Director of Audits  
Unclaimed Funds  
59 Maiden Lane, 23rd Floor  
New York, NY 10038  
Email: rtambini@osc.ny.gov  
Length of Relationship: 2022 – Present

## **NORTH DAKOTA DEPARTMENT OF TRUST LANDS**

Scott Giere, Revenue Compliance Auditor  
1707 North 9<sup>th</sup> Street  
P.O. Box 5523  
Bismarck, ND 58506-5523  
Phone: (701) 328-1951  
Email: SGiere@nd.gov  
Length of Relationship: 2019 – Present

## **STATE OF OHIO, DEPARTMENT OF COMMERCE**

Akil Hardy, Superintendent  
77 South High Street  
20th Floor  
Columbus, OH 43215  
Phone: (614) 644-6094  
Email: Akil.Hardy@state.oh.us  
Length of Relationship: 2013 – Present

## **OREGON STATE TREASURY**

Andrea Messer, Administrative Specialist  
775 Summer Street NE  
Suite 100  
Salem, Oregon 97301  
Phone: (503) 986-5290  
Email: Andrea.Messer@ost.state.or.us  
Length of Relationship: 2016 – Present

## **PENNSYLVANIA TREASURY DEPARTMENT**

Brian Munley, Esq., Director, Bureau of Unclaimed Property  
4<sup>th</sup> Floor, Riverside Office Center  
1101 S. Front Street  
Harrisburg, PA 17104  
Phone (717) 787-3344  
Email: BMunley@patreasury.gov  
Length of Relationship: 2008 – Present

## **STATE OF RHODE ISLAND, OFFICE OF THE STATE TREASURER**

Carol Aguasvivas, Director of Unclaimed Property  
P.O. Box 1435  
Providence, RI 02901  
Phone: (401) 462-7639  
Email: Carol.Aguasvivas@treasury.ri.gov  
Length of Relationship: 2021 – Present

## **TENNESSEE TREASURY DEPARTMENT**

John Gabriel, Director of Unclaimed Property  
P.O. Box 198649  
Nashville, TN 37219  
Phone: (615) 253-5354  
Email: John.Gabriel@tn.gov  
Length of Relationship: 2015 – Present

### STATE OF UTAH, OFFICE OF THE STATE TREASURER

Dennis Johnston, Unclaimed Property Administrator  
168 N. 1950 W.  
Suite 102  
Salt Lake City, UT 84116  
Phone: (801) 715-3321  
Email: DLJohnston@utah.gov  
Length of Relationship: 2021 - Present

### STATE OF VERMONT, OFFICE OF THE STATE TREASURER

Albert LaPerle, Director, Unclaimed Property Division  
109 State Street, 4<sup>th</sup> Floor  
Montpelier, VT 05609-6901  
Phone: (802) 828-2407  
Email: Al.LaPerle@vermont.gov  
Length of Relationship: 2020 – Present

### WEST VIRGINIA STATE TREASURER'S OFFICE

Heather Harrison, Compliance Director Unclaimed Property  
322 70<sup>th</sup> Street, SE  
Charleston, WV 25304  
Phone: (304) 340-1586  
Email: Heather.Harrison@wvsto.com  
Length of Relationship: 2017 – Present

### WYOMING STATE TREASURER'S OFFICE

Jeff Robertson, Administrator of Unclaimed Property  
200 West 24<sup>th</sup> Street  
Cheyenne, WY 82002  
Phone: (307) 777-5592  
Email: Jeff.Robertson@wyo.gov  
Length of Relationship: 2019 – Present

---

## 3.8 STANDARDS

SAS complies with the professional standards required by the American Institute of Certified Public Accountants (AICPA). The audit and identification of unclaimed property from the records of Holders, the processing of records and the demands for payment of the property to the STO shall be made in accordance with the Act, Generally Accepted Accounting Principles (GAAP) and Generally Accepted Auditing Standards (GAAS) to the extent applicable to unclaimed property audits. SAS adheres to neutral, unbiased accounting and financial reporting standards based on the core value of independence as outlined by the Governmental Accounting Standards Board (GASB).

---

### 3.9 STAFF QUALIFICATIONS

SAS's team members are dedicated to performing abandoned or unclaimed property examination services on behalf of all our Client States. All of SAS's most experienced Auditors work on examinations for each of our Client States. They have significant experience conducting examinations on Holders located across the country, from a multitude of industries and sizes, utilizing tested methods of sampling and extrapolation techniques and other audit programs in order to ensure the orderly flow of examinations. Among numerous other auditors and accountants, below are SAS's key team members who will be assigned to deliver the services required by this RFP.

SAS does not anticipate using subcontractors related to performing the services in this RFP.

#### MICHAEL DANOWITZ, PRINCIPAL

##### SPECIALTY AUDIT SERVICES, LLC

Principal (2004 to Present)

Manages and oversees all SAS unclaimed property audits of public and private companies on behalf of the firm's Client States. Examinations include the review of general ledger and securities-related details to determine if a company has been compliant with the applicable state's unclaimed and abandoned property law. Designs audit work plans and methodology to provide a complete review of all property types that may be areas of potential unclaimed and abandoned property liability.

##### ERNST & YOUNG LLP

Senior Manager (1997 to 2004)

Consulted on issues relating to state and local taxes including income and franchise tax planning, state tax minimization reviews, abandoned and unclaimed property consulting, and sales and use tax consulting. Researched and prepared memoranda for clients. Consulted with clients on tax restructuring issues for mergers and corporate reorganizations. Developed and delivered quality tax planning approaches for Fortune 1000 clients. Identified and offered opportunities for tax planning. Managed the work of client service team members and management staff. Represented clients before various administrative appeals boards.

B.A., Duke University

J.D., Widener University School of Law

LL.M., Georgetown University Law Center

## JASON GORDON, PRINCIPAL

### SPECIALTY AUDIT SERVICES, LLC

Principal (2004 to Present)

Manages and oversees all SAS unclaimed property audits of public and private companies on behalf of the firm's Client States. Examinations include the review of general ledger and securities-related detail to determine if a company has been compliant with the applicable state's unclaimed and abandoned property law. Creates audit work plans and methodology to provide a complete review of all property types that may be areas of potential unclaimed and abandoned property liability.

### ERNST & YOUNG LLP

Senior Manager (1997 to 2003)

Consulted on issues relating to health care organizations such as hospitals, physician-hospital organizations, management services organizations, physician practices, medical research organizations, and educational institutions. Researched and prepared memoranda for exempt and for-profit joint ventures, including analysis of the alternatives for corporate form and relevant tax issues. Consulted with clients on tax restructuring issues for mergers and corporate reorganizations. Provided advice regarding intermediate sanctions to academic and community health care organizations. Assisted in the coordination and implementation of Corporate Compliance Programs at health care institutions. Led focus groups, wrote and reviewed codes of conduct, interviewed executives, and conducted risk assessments to spot compliance issues. Reviewed exempt hospital-physician practice acquisitions for compliance with Fraud and Abuse, Anti-Kickback, and Intermediate Sanctions laws. Analyzed physician recruiting arrangements for compliance with incentive guidelines. Responsible for the publication of Ernst and Young's Philadelphia Health Care Tax monthly newsletter. Organized quarterly roundtable for clients to discuss relevant health care issues with Ernst & Young's local and national consultants.

### KPMG LLP

Senior Tax Specialist (1998 to 1999)

Consulted on issues relating to tax-exempt organizations, such as health care institutions, universities, foundations, and other exempt organizations. Provided tax advice on issues such as intermediate sanctions, unrelated business income, and corporate sponsorship of exempt organizations. Provided tax risk assessments during the implementation of corporate compliance programs. Prepared applications for tax exemption. Recruited by KPMG to join Health Care Tax Practice.

B.A., Albright College

J.D., Widener University School of Law

LL.M., Villanova University School of Law

## JAMES P. DOODY, JR., GENERAL COUNSEL

### SPECIALTY AUDIT SERVICES, LLC General Counsel (2022 – Present)

Assists in the management of all SAS unclaimed property audits of companies on behalf of the firm's Client States. Focuses on resolving complicated legal, regulatory, and administrative challenges involved in examinations. Leads all securities examinations and manages the securities review team. Provides legal guidance regarding securities examinations, mergers and acquisitions, scoping-related issues, confidentiality agreements, and third-party administrator contracts. Researches statutes, regulations, and judicial opinions to analyze implications for audit practices. Develops and refines examination procedures and identifies opportunities for increased examination efficiency. Reviews and crafts communications with Holder contacts and the accountants and attorneys that represent the Holders.

### INNOVATIVE ADVOCATE GROUP Managing Director (2019 – 2021)

Team lead for unclaimed property examinations. Responsible for business development and marketing of unclaimed property services.

### DRINKER BIDDLE & REATH Senior Accounting Director (2014 – 2019)

Lead accounting professional responsible for administering Delaware's Voluntary Disclosure Program. Reviewed voluntary disclosure submissions to verify accuracy of submission. Negotiated with Holders and advocates to agree to submissions that adhered to Delaware's voluntary disclosure guidelines.

### RYAN ABANDONED AND UNCLAIMED PROPERTY GROUP Director (2011 – 2014)

\*Ryan acquired Thomson Reuters' unclaimed property group in January 2013

Lead client contact for unclaimed property audit defense engagements, including assisting clients in negotiating the audit process with state auditors and settlements with state administrators. Responsible for business development and marketing of unclaimed property services; frequent speaker at national conferences and co-author of several unclaimed property articles. Managed team of professionals with revenue goal of \$2M. Member of Sales, Marketing and Quality Control Committees.

### THE GANNON GROUP, LLC Director (2010 – 2011)

### KELMAR ASSOCIATES, LLC Director (2008 – 2010) Senior Manager (2007 – 2008) Manager (2004 – 2006)

### PRICEWATERHOUSECOOPERS, LLP Tax Manager (2002 – 2004) Senior Tax Associate (1998 – 2002)

### DELOITTE & TOUCHE, LLP Tax Associate (1997 – 1998)

B.S., Fairfield University  
J.D., St. John's University School of Law  
LL.M., Boston University School of Law

## CHERYL KENNEDY, MANAGING DIRECTOR

### SPECIALTY AUDIT SERVICES, LLC

Managing Director (2019 to Present)

Assists in the management of all SAS unclaimed property audits of companies on behalf of the firm's Client States. Consults with other members of firm leadership and guides exam managers to resolve complicated, technical, and strategic issues involved in various examinations. Develops and refines examination procedures and identifies opportunities for increased efficiency. Guides all staff to ensure exam efficiency and offers input regarding next steps to ensure the progression of exams.

### DRINKER, BIDDLE, & REATH, LLP

Accounting Director (2016 to 2019)

Served as a primary accounting reviewer assisting with the administration of the Delaware Secretary of State's unclaimed property voluntary disclosure program ("VDA"). Oversaw more than 75 simultaneous VDAs; reviewed VDA submissions from Holders requested documents to confirm and adjust submissions; participated in conference calls with advocates and Holders and worked with Holders, advocates, and the State of Delaware to solve unusual situations, summarized findings and adjustments, and presented findings for the State of Delaware.

### RYAN LLC (FORMERLY THOMSON REUTERS)

Director (2012 to 2016)

Served as an unclaimed property project manager; assisted clients with audit defense, risk assessments, state voluntary disclosure agreements, and analyzed and quantified potential unclaimed property liabilities. Worked with 30+ clients to develop and implement comprehensive policies and procedures for the reporting and tracking of unclaimed property.

### KELMAR ASSOCIATES, LLC

Senior Manager (2003 to 2012)

Responsible for the completion of nearly 30 simultaneous audits; knowledgeable of the unique unclaimed property rules and regulations and applied rules to each audit; identified unclaimed property issues and discussed issues with peers and advocates; supervised and advised two managers and eight staff members and directed them to resolve issues promptly; developed managers and staff concerning audit processes and firm policies; controlled the quality and consistency of the team assignments; ensured the accuracy of the required monthly reports, internal and external project reporting, and final deliverables to the Firm's clients; communicated, verbally and written, the status of audits to partners and clients.

### ALSTOM POWER

Field Accountant (2001 to 2003)

B.S., University of Rhode Island

M.B.A., University of Rhode Island

## JENNIFER WILSON, AUDIT DIRECTOR

### SPECIALTY AUDIT SERVICES, LLC

Audit Director (2022 to Present)

Assists in the management of all SAS unclaimed property audits of companies on behalf of the firm's Client States. Consults with other members of firm leadership and guides exam managers to resolve complicated, technical, and strategic issues involved in various examinations. Develops and refines examination procedures and identifies opportunities for increased efficiency. Guides all staff to ensure exam efficiency and offers input regarding next steps to ensure the progression of exams.

### AUDIT SERVICES U.S., LLC

Audit Manager (2017 to 2022)

Solely responsible for conducting 12+ unclaimed property address audits from start to finish; including basic information gathering, document request production, data entry and analysis, remediation review, and final reports and deliverables for state government. Handle all communications with Holders and their advocate or legal counsel either via email, phone or in person meetings.

### KELMAR ASSOCIATES, LLC

Senior Manager (2006 to 2013)

Responsible for overseeing and ensuring the completion and accuracy of several unclaimed property audits conducted by engagement team managers. A selection of key responsibilities include: Lead and manage a professional staff of 15+ auditors including 4 direct reports; Control quality and consistency of the assignments in accordance with Firm processes and guidelines; Oversee 28+ unclaimed property engagements at any given time on behalf of 35+ Client States; Develop and implement internal technical training aimed at optimizing productivity with a focus on high quality deliverables; Communicate, both verbally and written, with Managing Directors, Firm principals and Client States to update on engagements status and issues; Ad hoc projects to enhance Firm standards including department representative for SSAE-16 audit.

### BLOUNT FINE FOODS, INC.

Logistics Department Assistant (2005 to 2006)

### NOVA BIOMEDICAL CORPORATION

Purchasing Assistant – Internship (2005)

B.S., Bentley University

## RANDY EMERSON, SENIOR AUDIT MANAGER

SPECIALTY AUDIT SERVICES, LLC

Senior Audit Manager (2021 to Present)

Audit Manager (2018 to 2021)

Leads unclaimed property examinations on behalf of state governments. Oversees groups of team members for multiple examinations. Prepares weekly status reports of each examination for SAS Principals, for use in reports for client jurisdictions. Ensures exam tasks are assigned and completed promptly. Works with the Senior Managers to enhance audit processes. Conducts interviews of candidates for all levels of employment.

Senior Auditor (2016 to 2018)

Internal process owner for two to three unclaimed property examinations. Mentored and guided Staff Auditors with the examination process. Assisted Audit Managers with numerous examinations. Developed audit deliverable templates to be used across the firm.

Staff Auditor (2015 to 2016)

Reviewed corporate tax returns to understand company operations and structure. Reconciled and reviewed company general ledger activity. Analyzed company records and presented information to process owners. Participated in monthly status calls with Audit Managers and company representatives.

B.S., Bloomsburg University

## KARI FOURNIER, MANAGER

### SPECIALTY AUDIT SERVICES, LLC Manager (2018 to Present)

Directs human resources services, policies, and programs for the entire company. Coordinates recruiting efforts, organizational and space planning, performance management, organization development, compensation and benefits administration, compliance, and facility security. Manages daily operations to safeguard and improve efficiency, oversee budgets and supply inventory, and provides inspired leadership, ultimately enhancing the culture and long-term success of the company. Liaison to State Government clients, providing excellent service as well as weekly and monthly progress reports. Leads business development efforts by attending industry events to establish rapport with potential clients, plan and oversee new marketing initiatives, find new opportunities, and create all proposals.

### INVISION SECURITY

#### Operations Manager (2016 to 2018)

Oversaw organizational contract development, creation, and maintenance. Performed appropriate administrative and operational research to support the proposal and contract development. Managed and developed marketing programs and materials such as advertising, event support, and online promotions, and ensured inventory of custom sales presentation materials. Coordinated logistics and deliverables for trade shows including booking booth and meeting space, creation of registration badges, managing housing, packing, and transporting exhibition material to and from office. Liaison for Business Security Camera Program handling all applications and final submissions for City grants. Effectively planned, scheduled, and projected lifecycle events and processes for new installations and service.

Project Management Certificate, Cornell University

## BRIAN KERICO, SENIOR AUDIT MANAGER

### SPECIALTY AUDIT SERVICES, LLC

Senior Audit Manager (2021 to Present)

Audit Manager (2014 to 2021)

Manages audit teams for unclaimed property examinations of Fortune 1000 companies for various states. Reviews tax returns of parent companies. Scopes in subsidiaries based on various criteria. Maintains regular communication regarding examination status with contacts of companies under audit. Reviews books and records of in-scope entities to determine potential unclaimed property liability.

### ALLOY SILVERSTEIN

Accountant/Tax Preparer (2014 to 2014)

Assisted senior accountants and managers with the preparation of individual and corporate income tax returns. Contacted clients to obtain information necessary to prepare returns. Used CCH Prosystem FX Suite software to complete year-end books and records and prepare tax returns. Participated in the review process for various year-end client audits.

### KIM & WRIGHT, P.C.

Senior Forensic Accountant (2002 to 2013)

Audited Business Interruption/Extra Expense and Employee Dishonesty Insurance Claims. Reviewed insurance policies to determine applicable coverage, limit of liability, waiting period/deductible, and contribution requirement. Communicated with the insured or representatives to discuss the types of financial information, records, or other data maintained. Prepared audit strategy, audit plan, and methodology to determine the loss. Issued monthly reports to client on investigation status. Performed detailed financial analysis. Developed projections by researching industry trends, events, and patterns, and designing financial models. Audited and reviewed financial information, records, and other data provided. Tested, traced, and vouched insurance claims as prepared. Issued final report and schedules to client on findings after the evaluation.

### JAMES F. LEONE & CO. CPA's

Staff Accountant (1999 to 2002)

Prepared cash disbursements and cash receipts. Assisted with preparation of accounting operations, including payables, receivables, monthly reconciliations, and financial statements. Reconciled bank statements and cash accounts. Completed federal & state payroll tax returns. Completed clients' year-end 1099s and W-2s. Completed individual income tax returns. Completed corporate income tax returns. Assisted with preparation and planning of clients' annual audits.

B.S., Rowan University

Graduate Certificate, Rowan University

## ETHAN MARCINEK, SENIOR AUDIT MANAGER

### SPECIALTY AUDIT SERVICES, LLC

Senior Audit Manager (2021 to Present)

Audit Manager (2018 to 2021)

Manages examinations as primary contact for Holders, creating internal tasks for team members. Handles day-to-day tasks associated with each examination. Calculates unclaimed property liability based on the overall results of the examinations. Mentors incoming employees with the necessary skills to become successful unclaimed property auditors. Assists with managing securities team, ensuring each exam is conducted properly following state-mandated laws and regulations associated with each client. Leader of employee retention team, generating valuable internal policies and events to increase employee work experience.

Senior Auditor (2015 to 2018)

Worked closely with management on large examinations to help facilitate the audit process. Drafted information document requests to gather information needed to complete unclaimed property audits. Reviewed external deliverables to ensure overall quality.

Staff Auditor (2014 to 2015)

Performed preliminary research on companies under audit, identifying business segments, relevant operating subsidiaries, and potential risk categories. Reviewed and reconciled internal documentation (i.e. accounts receivable aging reports, GL extracts, etc.) against trial balances to verify completeness of records. Analyzed and compared internal documentation (i.e., check register, void lists, etc.) to external bank documentation to identify discrepancies.

B.S., West Chester University of Pennsylvania

## STEVEN VALERIO, AUDIT MANAGER

### SPECIALTY AUDIT SERVICES, LLC

Audit Manager (2011 to Present)

Manages audit teams for unclaimed property examinations of Fortune 1000 companies for various states. Reviews tax returns of parent companies. Scopes in subsidiaries based on various criteria. Maintains regular communication regarding audit status with contacts of companies under audit. Reviews books and records of in-scope entities to determine potential unclaimed property.

### GLAXOSMITHKLINE

Quality Assurance Analyst – Oracle Hyperion Implementation (Contractor) (2010 to 2011)

Performed test scenarios for budget and forecast modules and the financial reporting modules of Hyperion. Developed and executed test case scripts. Tested application security features. Verified accuracy of output data and results. Communicated testing results, including logging of any test script failures. Identified and submitted change control requests.

B.S., Pennsylvania State University

## XAVIER PEREZ, ATTORNEY

### SPECIALTY AUDIT SERVICES, LLC

Attorney (2020 – Present)

Provide legal support, including drafting and reviewing commercial contracts and researching corporate, constitutional, and unclaimed property legal issues.

### POND LEHOCKY DISABILITY

Associate Attorney (2019 – 2020)

Organized and managed monthly caseload and brief distribution to attorneys. Prepared pre-hearing memorandums for submission to administrative law judges to supplement in-person hearings. Wrote “On the Record” requests for pre-hearing judgments and supplemental briefs for cessation of benefits hearings. Supervised law student internship program.

Law Clerk (2018 – 2019)

Reviewed administrative documents and medical records to prep cases for hearings. Evaluated the facts of cases to identify problematic issues and determine the most effective arguments to be made at hearings. Wrote post-hearing briefs to supplement case files and wrote On the Record briefs for pre-hearing judgments. Prepared fee petitions for billing approval by clients and Social Security.

B.A., Temple University

J.D., Temple University Beasley School of Law

## JAMIR BURNEY, SENIOR AUDITOR

### SPECIALTY AUDIT SERVICES, LLC

Narberth, PA

Senior Auditor (2016 – Present)

Prepare various outgoing correspondences, i.e. emails, information requests, confirmation responses, etc. Utilize analytical and data processing skills to examine large amounts of accounting records within excel to identify potential unclaimed property. Process owner of eight unclaimed property examinations which entails creating tasks, reviewing completed tasks, and ensuring the examination is on track. Conduct interviews with potential candidates. Utilize software such as Nuance and ABBYY FineReader to convert data provided by companies under audit so that additional analysis can be performed in a chosen format.

### MASTERY CHARTER SCHOOLS

Philadelphia, PA

Accounts Payable Internship (2015)

Filed and pulled invoices and other crucial documents while working with external auditors. Entered credit card batches, counted cash, and made bank deposit slips, and contacted vendors. Worked with the CFO and the Senior Director of Finance on special projects.

### BELLTOWER BOOKS, LLC

Sharon Hill, PA

Inventory Analyst (2014)

Unpackaged returned inventory and re-organized the inventory. Relist inventory and remove expired or non-sellable books. Multiple in-house tasks, i.e. putting up window protection, cleaning, etc.

B.S., Pennsylvania State University, Smeal College of Business

## STEPHEN FURNESS, SENIOR AUDITOR

SPECIALTY AUDIT SERVICES, LLC

Narberth, PA

Senior Auditor (2016 – Present)

Prepare agendas for monthly conference calls with companies under audit. Conduct monthly conference calls with companies under audit to ensure the examination is staying on course. Employ data conversion software such as Datawatch Monarch, Nuance, and ABBYY FineReader to convert and validate data related to companies under audit. Perform analysis of Accounts Payable, Accounts Receivable, Payroll, and various other property types using various applications to determine if the company under audit is holding unclaimed property. Execute on-site reviews of financial records such as payroll records, general ledgers, cash disbursement journals, and tax records. Conduct preliminary interviews, informing candidates of job details and briefing them about unclaimed property.

B.S., Temple University

## 4.1.1 SPECIFIC WORK PLAN - AUDITS

SAS applies a comprehensive examination methodology that will enhance the State's existing unclaimed property compliance program. SAS will locate, identify, and collect from Holders unclaimed property subject to report and delivery under applicable federal, state, and local laws.

SAS provides a level of objectivity and consistency in all our examinations. SAS uses an approach that documents progress and the Holder's positions on various important examination issues, which, in turn, ensures an expedited and efficient examination with minimal disruption to the Holder's day-to-day business affairs. Additionally, when discussions concerning important examination issues do occur, SAS follows up and provides the Holder with a written review of the items covered during the meeting. SAS's approach aims to identify outstanding issues and to ensure that challenges are dealt with openly, efficiently, and promptly. SAS, if needed, will engage and work with a reporting jurisdiction's representatives; however, SAS is fully capable of working independently to address and resolve Holder issues.

SAS's examination methodology is divided into five phases. Please find an in-depth overview of each phase of the examination below.

---

### PHASE I: IDENTIFICATION OF EXAMINATION CANDIDATES; AUTHORIZATION & INITIATION OF THE EXAMINATION

When SAS identifies a Holder who may have unclaimed property reportable to the State – either through SAS's independent research efforts or because of SAS's contractual relationships with other reporting jurisdictions – SAS will request authorization from the State to initiate the examination.

Upon notification that a Holder has been authorized for examination by the State, and in addition to the State's authorization letter, SAS will separately provide a letter ("Examination Engagement Letter"), confirming with the Holder that SAS has been engaged to conduct the unclaimed property examination. The Examination Engagement Letter provides contact information for SAS team members assigned to the examination. SAS's Examination Engagement Letter also identifies the type of property to be examined, the scope of the period to be examined (i.e., the "Lookback Period"), the estimated completion date, the types of documentation necessary to provide, and an invitation to participate in an opening conference ("Opening Conference").

Before the Opening Conference, SAS will complete additional background research from publicly available sources regarding the Holder's business activities and financial information. SAS's objective at the beginning of an examination is to understand the Holder's background, including formation history and company structure. Such research and analysis yield a productive Opening Conference and successfully initiates the examination. Conducting detailed background research helps define the scope of the examination and allows SAS to better understand the Holder's business so the examination is tailored to the Holder's practices, procedures, and records. Further, SAS believes that developing expertise in a Holder's specific industry or line-of-business is critical to our examination methodology. Not only does this preparation instill further confidence among the SAS team members carrying out an examination, but it also minimizes disruptions in the early stages of the examination, by providing a platform for success from the start.

Following the Opening Conference, SAS identifies the records necessary to perform the examination, including the general ledger details and source documents, and requests further documentation from the Holder to get an overall picture of its business. SAS also provides the Holder with an examination timetable to ensure the Holder understands the various milestones to be completed during the examination.

The Holder may request that SAS execute a Non-Disclosure Agreement, though SAS maintains the confidentiality of the Holder's information with or without such an agreement, as required by the applicable laws of our Client States. SAS also informs the Holder, in detail, of our examination approach, methodology,

and goals for the examination. After this meeting, SAS issues a follow-up request for additional documentation.

*Phase I includes the following steps:*

## IDENTIFY HOLDERS

SAS routinely discusses potential industries for review with our Client States. Some Client States request that we suggest potential examination candidates and that SAS provide consultation regarding improving a specific Holder's annual compliance. If requested, SAS will suggest Holders for examination. SAS would likely recommend Holders with material economic activity within the jurisdiction that are likely to hold unclaimed property, or Holders maintaining operations outside the reporting jurisdiction with customers, vendors, shareholders, employees, and related parties in the reporting jurisdiction. This research is conducted using publicly available information, including SEC filing documents, state business registration websites, and other public company information. Also, SAS has access to various private databases, such as Bloomberg, LexisNexis, and Hoovers for researching private companies.

## EXAMINATION ENGAGEMENT LETTER

SAS will request authorization from the State to initiate an examination of a Holder identified by SAS. Upon authorization, and after the State issues an examination letter, SAS will issue its Examination Engagement Letter, confirming with the Holder that SAS has been engaged by the State to conduct an examination, as well as providing contact information for SAS team members.

## BACKGROUND REPORTS

As briefly discussed above, SAS compiles a detailed research report on the Holder. SAS reviews a variety of historical background resources to understand the potential scope of the examination. This report includes a review of public documents from SEC Filings (e.g., 10Ks and 10Qs) and third-party sources (e.g., Hoovers, Data Monitor, LexisNexis, and Holder websites).

## OPENING CONFERENCE

SAS holds an Opening Conference, either in person or by teleconference, with the Holder and provides an overview of the examination methodology and the types of records required to conduct the examination. Building off of the extensive research SAS team members conduct before the Opening Conference, SAS also uses this time as an opportunity for the Holder to provide an overview of its activities and operations, including its structure and operating entities, unclaimed property compliance history, location of records, and the types of accounting systems used during the examination period. SAS also provides the Holder with an opportunity to ask questions related to the examination process.

## CONFIDENTIALITY, NON-DISCLOSURE AGREEMENT, AND SECURITY

SAS offers the Holder an opportunity to enter into a confidentiality and non-disclosure agreement. Regardless of whether a Holder chooses to execute an agreement, SAS maintains the confidentiality of the Holder's records (according to the applicable state's statutes) and the existence of an unclaimed property examination.

In addition to effectively conducting unclaimed property examinations, SAS prides itself on safeguarding records supplied to us by Holders. Indeed, SAS does not take lightly that Holders are providing records that might be harmful if publicized. Some methods SAS uses to ensure safe recordkeeping are (i) encrypting files stored on SAS systems; (ii) properly securing SAS's Narberth, Pennsylvania headquarters, which includes key fob entry on every door, alarm systems, and locking company-provided laptops to SAS team member workstations; and (iii) providing employee primers on maintaining confidentiality.

SAS's commitment to security is an ongoing process, as we are constantly examining our examination methodology and considering new ways to instill confidence in Holders and reporting jurisdictions. SAS undergoes an annual comprehensive audit of our controls to achieve a Service Organization Controls ("SOC") 1 certification. This designation assures Holders and reporting jurisdictions that SAS's internal processes, policies, and security comply with applicable regulations and standards. SAS undergoes this rigorous audit to provide confidence to our Client States that unclaimed property reported to the Client State is calculated and reported appropriately.

More information on SAS's security procedures can be found in Section 3.5 Internal Controls, Security and Technology.

## INFORMATION AND DOCUMENT REQUEST ("IDR") #1

SAS issues IDR #1 to request general information about the Holder to understand the Holder's operations and business and to identify the scope of the examination, including:

- Tax returns, including consolidating schedules;
- Corporate organization charts, including details regarding acquisitions and divestitures;
- Transfer agent information, including escheatment services provided; and
- Record retention policy and schedules.

A Preliminary Information Document Request (IDR #1) template has been included in this response as SAS Attachment #1 on page 39.

---

## PHASE II: SCOPING

In this phase, SAS reviews the current and historical operations of the Holder and creates an entity matrix for the Holder to review and confirm. This document demonstrates the Holder's activities, businesses, and revenue history, to allow SAS to continue the scoping process. SAS will determine which business entities will be reviewed in detail. SAS will also revisit the initial examination timeline discussed at the Opening Conference and, depending on the facts of the specific examination, work with the Holder to adjust, as needed. SAS, however, strives to keep examinations moving as efficiently as possible.

*Phase II includes the following steps:*

### ENTITY MATRIX

As briefly discussed above, SAS creates an entity matrix by reviewing tax returns, Form 851s, and consolidation schedules. The entity matrix schedules all relevant entities and identifies revenue figures, dates and jurisdictions of incorporation, acquisitions and divestitures, and business segments.

SAS determines the operating entities for detailed review, including a review of potential business segments. The entity matrix allows SAS to determine which entities will be reviewed in detail or if certain entities will be excluded from the review because of limited activity (e.g., holding company or finance company).

An Entity Matrix template has been included in this response as SAS Attachment #3 on page 46.

## MERGERS & ACQUISITIONS

It is common to encounter Holders who have acquired or divested an entity during the Lookback Period. SAS team members are accustomed to researching historical acquisitions and divestitures and where publicly available, collecting relevant information regarding the legal framework of the acquisition divestiture. Once identified, SAS's attorneys are familiar with reviewing stock purchase agreements, asset

purchase agreements, merger agreements, and other corporate transactions to determine the impact this activity has on the liabilities associated with unclaimed property and the examination.

## BANKRUPTCIES

SAS team members also regularly review the impact of bankruptcies upon an examination. SAS team members are familiar with identifying historical bankruptcies and actively monitor ongoing examinations for bankruptcy filings. Once identified, SAS's team of attorneys are familiar with reviewing all types of bankruptcies (i.e., Chapter 7, Chapter 11, and Chapter 13) and determining the impact of the automatic stay or discharge upon the examination. In instances where a Holder under current examination files a bankruptcy petition, SAS will monitor the filings, inform our Client States, and advise whether the state might be interested in pursuing a claim.

## INVENTORY TRACKER

Regularly in the examination process, SAS uses an examination inventory tracker to document the information requested in the IDRs, including the date requests are due (as well as any agreed-upon applicable extensions) and the date the request was initially provided to the Holder. The inventory tracker also indicates whether the response is complete and what additional information is necessary.

An IDR Tracker template has been included in this response as SAS Attachment #2 on page 43.

## HOLDER CONFIRMATION

At each stage of the examination, when a Holder provides a deliverable, SAS requires the Holder to confirm in writing that the deliverables provided are complete and accurate. This process aids SAS in ensuring the accuracy of records received, as well as minimizing instances when the Holder might dispute what has been sent or received.

## COMPANY SYSTEMS

SAS reviews the Holder's accounting systems and notes any conversions or upgrades. This review allows SAS to understand any limitations in obtaining company-generated documentation (i.e., trial balances, check registers, and aging reports) and whether the Holder has retained older accounting system information which could be useful during the examination.

---

## PHASE III: DATA COLLECTION & TRANSACTIONS TO BE REVIEWED

After the entity matrix is completed, outlining the specific entities for detailed examination, SAS requests and reviews detailed records for various property types for the agreed-upon time frames. Receipt of such records is subject to the rigorous security standards outlined in Phase I. Provided records are tied to the general ledger to confirm completeness, where applicable, and SAS creates populations or lists of transactions (i.e., the universe of transactions to be reviewed). The universes will be reviewed and refined by SAS and the Holder until both parties agree that the list of potential unclaimed property, by transaction and property type, is complete and accurate. The Holder must confirm these universes in writing before the examination can move to Phase IV.

*Phase III includes the following steps:*

## UNIVERSE CREATION

Universe creation includes a review of various property types (e.g., accounts payable, payroll, securities, and accounts receivable credits), voided and outstanding checks, general ledger accounts, credits, and

other property that might be industry-specific, such as royalties, rebates, gift cards, and property unique to the life insurance industry.

A Disbursement Universe template has been included in this response as SAS Attachment #6 on page 53.

## SAMPLING

Sampling techniques may be required if the Holder lacks sufficient records, or if the Holder's records are so detailed or voluminous such that reviewing all detailed records is impractical. As part of the sampling process, SAS ensures that the Holder accepts the process and that the approach meets any criteria established by the State. The use of sampling techniques allows SAS to provide an efficient, fair, and impartial result that adequately represents the Holder's liability. Statistical sampling is only done with prior approval from the State.

## AVAILABILITY OF RECORDS

At this time, a determination is made regarding the period of records that are available for SAS's review.

## ADDITIONAL DOCUMENTATION REQUESTS

SAS requests documentation using IDRs, which can include requests for the Holder's unclaimed property filing history, bank data (statements, reconciliations, and voided, stopped, paid, and outstanding checklists), company-generated data (check registers, aging reports, and general ledger detail (i.e., SAP, Oracle)), and third-party information (i.e., ADP and transfer agents).

An Abandoned or Unclaimed Property Filing Matrix template has been included in this response as SAS Attachment #4 on page 49.

## DATA VALIDATION

Data is validated by SAS and tied to the general ledger, where applicable, or otherwise verified for completeness. It is common for Holders to provide incomplete records. In those circumstances, SAS is accustomed to crafting solutions appropriate to the various circumstances that arise. Specific examples of incomplete records are addressed below.

### **Nonexistence of Owners' Addresses**

It is common for Holders to provide incomplete records that do not include complete address information, or that may altogether lack address information. This can occur because of the passage of time, Holder system conversions, or simply from a Holder's poor recordkeeping practices.

In every instance when incomplete records are provided, SAS first reviews all information provided to determine whether the address information is available among other records provided. For example, if a Holder produces a check register lacking address detail, SAS will review other provided information such as vendor lists, bank statements and reconciliations, and even source documentation provided for other property types, to determine whether the Holder has address detail for the transactions in question. If addresses cannot be identified from other Holder-provided source documentation, SAS will return the transactions for the Holder to conduct a supplemental search among its internal records and update the file accordingly. If both SAS and the Holder are unable to identify owner address information, transactions determined to be owner unknown property are reportable to the Holder's state of incorporation under *Texas v. New Jersey*, 379 U.S. 674 (1965).

### **Out-of-Proof Records**

On occasion, a Holder may be able to produce records for a given property type but may have limitations regarding the Holder's ability to research individual transactions. While this may be a legitimate records limitation issue, it is also ripe for abuse by Holders and requires careful consideration during an

examination. In many cases, SAS can reduce the instances when this is an issue by requesting all records available (irrespective of the Holder's ability to research the items) and by formalizing a records availability letter after records production. In the records availability letter, an officer of the company attests to the completeness of the produced records and to the Holder's ability to research the items. This records availability letter sets shared expectations for both SAS and the Holder as to what records will be reviewed, and what years may be subject to estimation as permitted by the Client State. Occasionally, the Holder's ability to research transactions may depend on the individual facts and circumstances related to the records produced. In these circumstances, SAS is accustomed to crafting solutions with the Holder and the state that balance fairness to the Holder and the state's interest in the robust reporting of unclaimed property.

## BANK ACCOUNT MATRIX

Bank accounts are reviewed, and a bank account matrix is created that maps to the general ledger accounts to ensure that each relevant account is included in the examination review process.

A Bank Account Matrix template has been included in this response as SAS Attachment #5 on page 51.

## INTERVIEWS

SAS may conduct interviews of key personnel in the Holder's various accounting functions to understand the policies and processes and how they have evolved throughout the examination period.

## HOLDER CONFIRMATION

Before entering remediation (i.e., research and documentation proving that a specific transaction does not represent unclaimed property) in Phase IV, the Holder's representatives must accept the transactions selected for detailed review. At this stage of the exam, the Holder is allowed to raise any objections to the property types and transactions selected for detailed testing. All the Holder's objections, exceptions, or potential concerns are memorialized as part of the exam and, if necessary, the State will be included in the discussions to resolve issues.

---

## PHASE IV: REMEDIATION

In this phase, the Holder will decide whether to review each transaction individually or, request that a statistical sample of the transactions be selected. This decision must be communicated to SAS in writing and is memorialized as part of the examination workplan. If the Holder provides sufficient documentation that a liability has been satisfied, the item will be "cleared." If not, the item will be deemed an "error" representing an unclaimed property liability subject to reporting, or additional documentation may be requested to make a final determination. When a Holder exhausts remediation efforts, the Holder may provide a list of disputed items and any objections to SAS's determinations. When unclaimed property is identified during an examination, SAS is accustomed to guiding the Holder's due diligence process to ensure compliance with a jurisdiction's laws and regulations. As necessary, SAS will request copies of due diligence notices and/or letters and will monitor responses to ensure that unclaimed property is returned to owners or reported appropriately.

An Audit Workplan template has been included in this response as SAS Attachment #7 on page 55.

*Phase IV includes the following steps:*

## HOLDER RESPONSES & OBJECTIONS

The Holder responds to the identified transactions by providing remediation documentation that demonstrates that the item does not represent an unclaimed property liability. Remediation

documentation could include such things as reissued checks, invoices, and documentation that demonstrate the original liability has been satisfied. For example, with a voided check, SAS would require information on the voided check and information that ties a reissued check to the original check. This information may include copies of invoices demonstrating that both the original and reissued check satisfy the same liability, print screens from the Holder’s system to document the transaction, or proof that the reissued check cleared the bank (i.e., bank statement or copy of a canceled check). The Holder may provide a list of any objections to SAS’s remediation determinations.

## REVIEW

SAS reviews each piece of documentation and determines whether the item “clears” or is an “error” representing potential unclaimed property liability.

---

## PHASE V: COMPLETION OF THE EXAMINATION

During the final phase of the examination, SAS prepares an examination report and a liability calculation. The liability calculation provides a detailed review of SAS’s findings. At this time, the Holder may still provide additional remediation documentation for review.

*Phase V includes the following steps:*

## HOLDER CONFIRMATION

This phase includes the last opportunity for the Holder to provide additional documentation and remediate transactions. SAS will ensure that the Holder confirms it has performed any due diligence efforts required by applicable law and that the Holder reports and delivers its unclaimed property liability, along with any interest, reviewed during the examination in the format required by the State.

## ESTIMATION

If estimation is used, the examination report and preliminary liability will include error rates by property type. All transactions that are “errors” would be reportable to the appropriate reporting jurisdiction. Estimation methodology is discussed with the applicable Client State and is subject to the Client State’s approval. All estimation methodology is conducted according to the priority rules.

## CONCLUSION

Upon conclusion, SAS issues examination findings in the form required by the State, along with the total dollar amount of unclaimed property liability, by property type, reportable to the State. The findings include documentation of the data gathered during the examination, the various examination milestones, documentation of the Holder’s cooperation with the process, and an explanation of any sampling and/or estimation used. The findings will include an examination trail intended to be easily understood by potential third-party users, such as attorneys, hearing examiners, and others who may rely upon the examination in the future. SAS is committed to ensuring the examination process is thoroughly transparent, which includes gathering and maintaining comprehensive records of the work performed.

Once any liability is finalized, SAS works with the Holder to ensure that the property is reported and remitted appropriately. SAS is accustomed to facilitating the reporting and remittance of all property categories (including securities-related property), as well as working closely with reporting jurisdictions to ensure the property is reported following the jurisdiction’s reporting procedures.

## SETTLEMENT AGREEMENTS, RELEASES, AND INDEMNIFICATION

Many of our Client States request that we assist Holders and the Client State with working through settlement agreements. These settlement agreements may include releases of liability and in some cases, may indemnify the Holder for property reported to the state through the examination.

### Settlement Agreements

SAS is accustomed to using and adapting state-provided settlement agreements or working with states to draft unique settlement agreements for a Holder's specific circumstances. SAS's four attorneys are experienced in drafting, reviewing, revising, and customizing settlement agreements related to unclaimed property examinations and have assisted with hundreds of unclaimed property settlement agreements for Client States.

### Releases of Liability

It is common for settlement agreements to include releases of liability and these provisions are regularly requested or added to settlement agreements by Holder advocates. It is SAS's practice to provide a closing memo to the Client State that identifies the entities, property types, and years subject to review. For any entity, property type, and year reviewed, SAS conducts a thorough review such that a state may comfortably conclude that all property identified for those periods has been captured appropriately. With that assurance, if desired, a state may comfortably provide a release with confidence for every year reviewed. SAS regularly reviews releases to confirm the releases are drafted and appropriately tailored to the scope of the review conducted.

### Indemnification

It is also common for settlement agreements to include indemnification clauses whereby the Client State takes responsibility for reuniting unclaimed property with a given owner, even if that owner contacts the Holder. SAS regularly reviews indemnification agreements to confirm the indemnification is appropriately limited to the reported addressable property and does not improperly bind the reporting jurisdiction.

## GUIDANCE

In addition, SAS provides the Holder with guidance regarding how to improve internal compliance and reporting procedures, as well as how to file all future reports directly with the State.

## DELIVERY AND REMITTANCE

SAS's business is built on trust and ensuring that its Client States receive the appropriate amount of unclaimed property promptly and without delay using delivery instructions provided by the State. Upon completion of an examination, some jurisdictions have Holders report property directly to the reporting jurisdiction, and SAS is accustomed to facilitating those transactions. In other circumstances, reporting jurisdictions request that SAS take possession of the unclaimed property and then deliver the appropriate amount of property to the reporting jurisdiction. Whenever SAS is holding unclaimed property to be reported to a reporting jurisdiction, the unclaimed property is retained in a separate bank account, subject only to draft under the contract with the reporting jurisdiction. Regarding any securities-related property reported, SAS is familiar with facilitating the appropriate transfer of securities following reporting jurisdiction preferences. The value of securities is generally determined by the closing price of any security traded on an exchange on the date of delivery unless otherwise directed by the reporting jurisdiction. Unclaimed property reports for all property reported are submitted electronically in compliance with the National Association of Unclaimed Property Administrators (NAUPA) Standard Electronic File Format unless a different format is requested by the reporting jurisdiction.

## TRAINING

SAS has led trainings of state employees regarding performing examinations and compliance reviews of annual unclaimed property compliance filings. We also regularly consult with our clients regarding

potential unclaimed property statutory changes and relevant case law. Our most significant training was conducted for the State of Delaware. This training involved SAS developing procedures and training Delaware employees regarding how to: (1) identify companies with inadequate annual compliance; (2) review annual compliance reports, and (3) review records to test whether the reporting was complete and accurate. West Virginia, along with other Client States such as Ohio, Pennsylvania, Tennessee, and Florida (as well as prospective clients) have sought guidance from our firm regarding statutory changes, examination candidates, and insight into unclaimed property issues encountered in our experience with other Client States.

Additionally, during an examination, it is common for SAS to educate Holders under review regarding the requirements of the state's unclaimed property laws and regulations. We maintain an open line of communication to respond to and address Holder questions. Also, Jim Doody and Cheryl Kennedy from our team have each spoken at Holder-focused unclaimed property conferences and trade organizations regarding unclaimed property compliance and audit-related issues.



**SAS ATTACHMENT #1  
PRELIMINARY INFORMATION DOCUMENT REQUEST  
("IDR")**

TO: Contact Name  
Company Name  
Contact Email

FROM: Process Owner  
Specialty Audit Services, LLC  
[Process Owner@sasaudit.com](mailto:Process Owner@sasaudit.com)

DATE: Date

RE: Abandoned or Unclaimed Property Exam Information Document  
Request #1

---

The following is a list of items required to commence the abandoned or unclaimed property examination of **Company Name**, its subsidiaries, and its related entities (the "Company").

All data should be provided in electronic format to the extent possible. If data is downloaded from a company system, please provide it in Excel, text, or database files. If the response is "no," "not applicable," or "the documentation does not exist," please provide that response in writing **directly from the Company [include if Company has advocate]**.

**Please provide all responses in writing by or at the Opening Conference.**

---

[Note to SAS users: Year 1 = Lookback Year (generally 15 years before Audit Notice);  
Year 2 = Year before Audit Notice]

**A. GENERAL**

1. Provide current corporate organization chart (by entity).
2. For the years **Year 1** (or year of incorporation) through **Year 2**, identify each subsidiary or related entity using the Entity Template provided. Include all entities in existence, acquired, dissolved, merged, or sold. For each of these entities, provide all information indicated in the Entity Template.
  - a. Date and state of incorporation, and any reincorporation if applicable.
  - b. Federal Employer Identification Number.
  - c. If the entity was acquired or sold, whether it was through an asset or stock sale/purchase.
  - d. Brief description of business activities.
  - e. Identify any entities that provide shared services for other subsidiaries (e.g., disbursements, rebates).
  - f. Identify any entities whose revenue is mainly generated through intercompany transactions.
  - g. Identify any entities that have ever been issuers of securities registered with the U.S. Securities and Exchange Commission.

3. Identify the Company's current transfer agent and indicate when the Company began its relationship with the transfer agent. (only include if company, a subsidiary, or a related entity is publicly traded)
4. Provide the following Federal Tax Return (Form 1120 or Form 1065) related information from Year 1 through Year 2.
  - a. The initial summary pages through Schedule L
  - b. Federal Form 851 (Affiliations Schedules)
  - c. Consolidating income statement and balance sheet by entity
  - d. Federal Form 966 (Corporate Dissolution or Liquidation), including any related supporting documentation, if applicable
  - e. Federal Form 8023 (Elections Under Section 338 for Corporations Making Qualified Stock Purchases), if applicable
  - f. Federal Form 8594 (Asset Acquisition Statement), if applicable
  - g. Any partnership returns (Federal Form 1065 and Schedule K-1)
  - h. For any entity deemed to be disregarded for tax purposes, confirm where the operating revenue is reflected on the parent's tax return and to the extent *pro forma* documents exist for disregarded entities, please provide.
  - i. For any stock acquisitions that occurred from Year 1 through Year 2, Form 1120 or Form 1065 from Year 1 through Year 2 prior to the acquisition with applicable Form 851 and consolidating schedules
5. Provide a copy of the Company's record retention policies and schedules.
6. Describe any accounting systems or software (including version number) the Company uses. If there was ever a system conversion or upgrade, provide dates of the conversion(s) or upgrade(s), including version numbers, and state whether they were full conversions or upgrades where complete historical data and details were maintained.
7. Confirm whether the Company used any third-party service providers from Year 1 through Year 2 for the following services: payroll, disbursements, collections, gift card/gift check/gift certificate/rebate fulfillment, or unclaimed property compliance.
8. Confirm whether the Company employs a centralized (e.g., shared services entity) or decentralized model for payroll, disbursements, collections, gift card/gift check/gift certificate/rebate fulfillment, or unclaimed property compliance.
9. Describe the Company's process for handling stale-dated, stopped, voided, and outstanding checks.
10. Describe the Company's process for handling customer overpayments, customer returns, and credit balances.
11. Confirm whether the Company had any rebate programs from Year 1 through Year 2.

12. Confirm whether the Company had any gift card, gift check, or gift certificate programs from Year 1 through Year 2.
13. Confirm whether the Company had any royalty or incentive programs from Year 1 through Year 2.

**B. ABANDONED OR UNCLAIMED PROPERTY**

1. Confirm whether the Company has ever filed unclaimed property reports to any states.
2. Confirm whether the Company had ever been audited for unclaimed property compliance by any states. If yes, identify the jurisdictions, periods, and property types covered, and provide copies of the audit reports.
3. Confirm whether the Company had ever entered into any unclaimed property amnesty or voluntary disclosure agreements with any states. If yes, identify the jurisdictions, periods, and property types covered, and provide copies of the agreements.



**SAS ATTACHMENT #2  
IDR INVENTORY TRACKER**

**Examination Holder**  
**Abandoned or Unclaimed Property Examination**  
**Information Document Request (IDR) Tracker**  
**As of: Month DD, YYYY**

	Item is currently being reviewed by SAS.
	Item is not complete; information is still needed.
	Item is complete, closed or superseded.

ITEMS	Date Provided to Holder	Date Response due to SAS (Extension)	Date Provided to SAS	Response/Documents Provided by Holder	SAS Determination	Completion Status	SAS Follow Up Questions/Requests
<b>GENERAL</b>							
IDR.01.G.01	Provide current corporate organization chart (by entity).	xx/xx/xxxx	Opening Conference			Outstanding	
IDR.01.G.02	For the years Year 1 (or year of incorporation) through Year 2, identify each subsidiary or related entity using the Entity Template provided. Include all entities in existence, acquired, dissolved, merged, or sold. For each of these entities, provide all information indicated in the Entity Template. a. Date and state of incorporation, and any reincorporation if applicable. b. Federal Employer Identification Number. c. If the entity was acquired or sold, whether it was through an asset or stock sale/purchase. d. Brief description of business activities. e. Identify any entities that provide shared services for other subsidiaries (e.g., disbursements, rebates). f. Identify any entities whose revenue is mainly generated through intercompany transactions. g. Identify any entities that have ever been issuers of securities registered with the U.S. Securities and Exchange Commission.	xx/xx/xxxx	Opening Conference			Outstanding	
IDR.01.G.03	Identify the Company's current transfer agent and indicate when the Company began its relationship with the transfer agent. (only include if company, a subsidiary, or a related entity is publicly traded)	xx/xx/xxxx	Opening Conference			Outstanding	
IDR.01.G.04	Provide the following Federal Tax Return (Form 1120 or Form 1065) related information from Year 1 through Year 2. a. The initial summary pages through Schedule L. b. Federal Form 851 (Affiliations Schedules). c. Consolidating income statement and balance sheet by entity. d. Federal Form 966 (Corporate Dissolution or Liquidation), including any related supporting documentation, if applicable. e. Federal Form 8023 (Elections Under Section 338 for Corporations Making Qualified Stock Purchases), if applicable. f. Federal Form 8594 (Asset Acquisition Statement), if applicable. g. Any partnership returns (Federal Form 1065 and Schedule K-1). h. For any entity deemed to be disregarded for tax purposes, confirm where the operating revenue is reflected on the parent's tax return and to the extent pro forma documents exist for disregarded entities, please provide. i. For any stock acquisitions that occurred from Year 1 through Year 2, Form 1120 or Form 1065 from Year 1 through Year 2 prior to the acquisition with applicable Form 851 and consolidating schedules.	xx/xx/xxxx	Opening Conference			Outstanding	
IDR.01.G.05	Provide a copy of the Company's record retention policies and schedules.	xx/xx/xxxx	Opening Conference			Outstanding	
IDR.01.G.06	Describe any accounting systems or software (including version number) the Company uses. If there was ever a system conversion or upgrade, provide dates of the conversion(s) or upgrade(s), including version numbers, and state whether they were full conversions or upgrades where complete historical data and details were maintained.	xx/xx/xxxx	Opening Conference			Outstanding	
IDR.01.G.07	Confirm whether the Company used any third-party service providers from Year 1 through Year 2 for the following services: payroll, disbursements, collections, gift card/gift check/gift certificate/rebate fulfillment, or unclaimed property compliance.	xx/xx/xxxx	Opening Conference			Outstanding	
IDR.01.G.08	Confirm whether the Company employs a centralized (e.g., shared services entity) or decentralized model for payroll, disbursements, collections, gift card/gift check/gift certificate/rebate fulfillment, or unclaimed property compliance.	xx/xx/xxxx	Opening Conference			Outstanding	
IDR.01.G.09	Describe the Company's process for handling stale-dated, stopped, voided, and outstanding checks.	xx/xx/xxxx	Opening Conference			Outstanding	
IDR.01.G.10	Describe the Company's process for handling customer overpayments, customer returns, and credit balances.	xx/xx/xxxx	Opening Conference			Outstanding	
IDR.01.G.11	Confirm whether the Company had any rebate programs from Year 1 through Year 2.	xx/xx/xxxx	Opening Conference			Outstanding	
IDR.01.G.12	Confirm whether the Company had any gift card, gift check, or gift certificate programs from Year 1 through Year 2.	xx/xx/xxxx	Opening Conference			Outstanding	
IDR.01.G.13	Confirm whether the Company had any royalty programs from Year 1 through Year 2.	xx/xx/xxxx	Opening Conference			Outstanding	
<b>ABANDONED OR UNCLAIMED PROPERTY ITEMS</b>							
IDR.01.AUP.01	Confirm whether the Company has ever filed unclaimed property reports to any states.	xx/xx/xxxx	Opening Conference			Outstanding	
IDR.01.AUP.02	Confirm whether the Company had ever been audited for unclaimed property compliance by any states. If yes, identify the jurisdictions, periods, and property types covered, and provide copies of the audit reports.	xx/xx/xxxx	Opening Conference			Outstanding	
IDR.01.AUP.03	Confirm whether the Company had ever entered into any unclaimed property amnesty or voluntary disclosure agreements with any states. If yes, identify the jurisdictions, periods, and property types covered, and provide copies of the agreements.	xx/xx/xxxx	Opening Conference			Outstanding	

Notes:  
(1) NDA fully executed on \_\_\_\_.



**SAS ATTACHMENT #3**  
**ENTITY MATRIX**







**SAS ATTACHMENT #4  
ABANDONED OR UNCLAIMED PROPERTY  
FILING MATRIX**

Examination Holder  
 Subsidiary Name (if applicable)  
 Abandoned and Unclaimed Property Examination  
 AUP Filing Inventory

Confirmation of filings needed from holder  
 Missing payment confirmation

Reporting Jurisdiction	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Totals
Alabama															\$0.00
Alaska															\$0.00
Arizona															\$0.00
Arkansas															\$0.00
California															\$0.00
Colorado															\$0.00
Connecticut															\$0.00
Delaware															\$0.00
District of Columbia															\$0.00
Florida															\$0.00
Georgia															\$0.00
Guam															\$0.00
Hawaii															\$0.00
Idaho															\$0.00
Illinois															\$0.00
Indiana															\$0.00
Iowa															\$0.00
Kansas															\$0.00
Kentucky															\$0.00
Louisiana															\$0.00
Maine															\$0.00
Maryland															\$0.00
Massachusetts															\$0.00
Michigan															\$0.00
Minnesota															\$0.00
Mississippi															\$0.00
Missouri															\$0.00
Montana															\$0.00
Nebraska															\$0.00
Nevada															\$0.00
New Hampshire															\$0.00
New Jersey															\$0.00
New Mexico															\$0.00
New York															\$0.00
North Carolina															\$0.00
North Dakota															\$0.00
Ohio															\$0.00
Oklahoma															\$0.00
Oregon															\$0.00
Pennsylvania															\$0.00
Puerto Rico															\$0.00
Rhode Island															\$0.00
South Carolina															\$0.00
South Dakota															\$0.00
Tennessee															\$0.00
Texas															\$0.00
Utah															\$0.00
Vermont															\$0.00
Virgin Islands															\$0.00
Virginia															\$0.00
Washington															\$0.00
West Virginia															\$0.00
Wisconsin															\$0.00
Wyoming															\$0.00
<b>Totals</b>	<b>\$0.00</b>														



**SAS ATTACHMENT #5  
BANK ACCOUNT MATRIX**





**SAS ATTACHMENT #6  
DISBURSEMENT UNIVERSE**





**SAS ATTACHMENT #7**  
**AUDIT WORKPLAN**

**Holder Name**  
**Abandoned and Unclaimed Property Examination**  
**Audit Workplan**

**Date of State Audit Notice:**  
**Holder Contact:**  
**Holder Contact Email:**  
**SAS Audit Manager:**  
**SAS Audit Manager Email:**  
**Anticipated Close Date: May 2024**

Phase	Step	Goal
Phase I (120 days) May 2022 - August 2022	Exam Initiation	SAS establishes direct contact with Holder. SAS issues IDR #1 which includes requests for general information and historical documentation (Tax Returns, AUP Filings, etc.), and provides NDA upon Holder's request. Holder provides complete responses to IDR #1 at or before the Opening Conference. SAS and Holder conduct Opening Conference, and set up recurring status calls.
Phase II (210 days) September 2022 - March 2023	Data Collection	SAS issues Detailed Records Request for in-scope entities. Holder provides responses to the Detailed Records Request. SAS makes additional record requests if such documents are deemed necessary after reviewing the previous submissions. Site visit, if necessary. All major historical documents must be submitted by the end of this step. Holder confirms records availability by the end of this step.
	Universe Creation	SAS performs check register analysis, AR report analysis, general ledger review and other analyses to support universe creation. Holder responds to SAS's follow-up questions. SAS issues preliminary universes by the end of this step.
	Universe Confirmation	Holder advises its preference between 100% remediation and stratified sampling, if applicable. SAS provides strata and sample selections for Holder's consent, if applicable. SAS issues confirmed universes for remediation by the end of this step. Holder confirms AUP Filing Matrix and Entity Matrix by the end of this step.
Phase III (210 days) April 2023 - October 2023	Remediation	Holder provides remediation support. SAS reviews remediation support and returns remediation work papers on a rolling basis during this step. SAS makes final requests for additional information.
Phase IV (180 days) November 2023 - May 2024	Preliminary Liability Determination	SAS completes final review of any additional remaining remediation support provided by the Holder. Holder provides a list of contested remediation items, if applicable. SAS provides preliminary liability calculation to Holder and the State by the end of this step.
	Finalization of Exam and Reporting	Holder and the State finalize any outstanding contested issues and the terms of a release or settlement agreement. Exam is finalized, with property and information remitted to the State.

REQUEST FOR QUOTATION  
Professional Auditing Services

---

**EXHIBIT A – PRICING PAGE (Revised 8/30/22)**

**Vendor affirms by their signature or submission of a bid response that they will accept the fee schedule as listed for all STO mandatory, requested and approved services. All vendor expenses must be included in the established fee schedule and shall not be reimbursed separately.**

**Note: Vendor is not required to provide services considered Optional. Such response will have no bearing on a contract award.**

**MANDATORY SERVICES:**

**Per Section 4.1.21.1:** Vendor fees for the identification and collection of unclaimed property will be a flat 10.5 percent (10.5%) of the net unclaimed property remitted to the WV STO.

**OPTIONAL SERVICES (Non-mandatory):**

**Per Section 4.2.10: Compensation:** All Vendor fees for the Voluntary Compliance Program will be a flat 9 percent (9%) of the net unclaimed property remitted to the STO. Net unclaimed property is the gross value of all unclaimed property, minus the value of all unclaimed property delivered by the Holder, if any, that otherwise would have been delivered pursuant to the reporting practices of the Holder as they existed prior to the execution of the agreement with Vendor.

**Fee: Flat Rate of 9%**

**Vendor will offer this service:      Yes   X                        No**

**Per Section 4.3.1: Compensation:** Audit Agreed Upon Procedures related to a Holder which is outside of the scope of a multistate audit, West Virginia state specific audit, or Vendor-assisted self-audits will be paid on an hourly basis at the rate of \$100 per hour, and the total cost will be capped in a release order, if selected.

**Fee: Not to Exceed \$100/hour**

**Vendor will offer this service:      Yes   X                        No**

SAS Fee: \$100/hour

REQUEST FOR QUOTATION  
Professional Auditing Services

---

I/We agree to the established fee schedule for the mandatory services listed within this solicitation and resultant contract award, including any of the selected optional services affirmed above:

Company Name: Specialty Audit Services, LLC

Printed Name of Signatory: Michael A. DANOWITZ

Title of Signatory: Principal

Signature: 