

Section 11

Legal and Financial Issues





Definitions of Legal Documents

Helping older relatives or friends ensure that their preferences regarding medical care and/or financial decisions will be followed in the event of incapacitation or inability to communicate.

All of the documents listed below are meant to be discussed and shared with family members and appropriate professionals. They should be stored in an easily accessible location and not locked in a safe deposit box or filing cabinet.

Advance Directives

This is a generic term for a group of documents that are prepared by a person in advance to ensure that, in the event he or she becomes incapacitated or unable to communicate, his or her wishes will be followed. In order to be legally valid, the person signing an advance directive must be able to understand the nature of the document being signed. An advance directive can be revoked.

Living Will

A Living Will allows a person to identify ahead of time which medical procedures or interventions he or she does or does not want to receive. It is intended to be used as a guide to treatment in the event that he or she becomes unable to make or communicate decisions due to an irreversible coma, persistent vegetative state, or similar type of condition. A Living Will may be a stand-alone document or included as part of a Health Care Power of Attorney (see below).

NOTE: When creating a Living Will, it is important to talk to a doctor about the meaning of all the terms and treatments that are included, as well as the potential implications of the decisions being made.

Durable Health Care Power of Attorney

A Durable Health Care Power of Attorney allows a person to choose another individual—an “agent”—to make health care decisions on his or her behalf in the event that he or she becomes too ill to make or communicate decisions. Once the person regains the ability to communicate or make decisions, the agent is no longer authorized to do so on his or her behalf. This document can include a person’s wishes regarding the medical procedures or interventions that he or she does or does not want to receive.

NOTE: A Medical or Health Care Power of Attorney gives the agent authority to make all medical care decisions unless specific limitations are included ahead of time.

Pre-Hospital Medical Care Directive

Pre-Hospital Medical Care Directives are sometimes called Do Not Resuscitate forms or “Orange Cards.” These forms, which must be signed by a physician and printed on orange paper to have legal effect, inform emergency medical personnel to withhold life-saving measures in the event that cardiac or respiratory arrest occurs. Presenting this document to medical personnel means that the person is ready to die and understands that death may result if resuscitation is withheld. NOTE: The Pre-Hospital Medical Care Directive is a standardized form that must be printed on orange paper and signed by a physician to be valid. A recent photo of the person should be attached to the form.

Durable Mental Health Care Power of Attorney

A Durable Mental Health Care Power of Attorney allows a person to appoint another individual—an “agent”—to make mental health care decisions on his or her behalf if he or she becomes unable to do so. NOTE: This document can be helpful for someone with a mental illness or a disease-related dementia where institutional mental health services may be needed in the future. Mental health institutional placements are not covered by a regular Health Care Power of Attorney and require a court proceeding—unless a Mental Health Care Power of Attorney has been prepared ahead of time.

Financial Power of Attorney

The Financial Power of Attorney allows a person to appoint another individual—an “agent”—to manage financial matters on his or her behalf. These matters can include making business and property decisions. The agent may only make decisions that benefit the person involved and the agent cannot personally benefit from the Power of Attorney unless there is language in the document that specifically allows it.

Guardianship

Guardianship is the result of a legal court proceeding that removes decision-making power from an individual who is deemed to be incapacitated and transfers it to another individual—a “guardian.” The guardian is appointed by the court to make all decisions for the incapacitated person, the same way a parent makes all decisions for child.

Conservatorship

A conservatorship is the result of a legal court proceeding that removes financial decision-making power from an individual who is deemed unable to make financial decisions for him or herself and transfers it to another individual—a “conservator.”

Fiduciary

A fiduciary is a person who accepts responsibility for taking care of the needs or property of another person for the benefit of that person. A public fiduciary is a county official who has statutory responsibility to assume guardianship of incapacitated persons who have no one to assume this role for them. A private fiduciary is a person who has been certified or licensed to serve as a personal guardian or conservator.

Surrogate Decision Makers (Statute 36-3231)

If a person becomes unable to make or communicate health care treatment decisions and has not prepared an advance directive, a surrogate decision-maker can make health care decisions on his or her behalf. If willing and available, the following individuals can serve as surrogates regarding treatment decisions (in order of priority): spouse (unless legally separated), adult child, parent, domestic partner, sibling, a close friend or the attending physician.

Resources

Pima Council on Aging: (520) 790-7262 or www.pcoa.org.

Pathfinder: Definitions of Legal Documents Revised 06/2014



Advance Directives

Helping older relatives or friends make more informed choices about medical care and/or financial decisions.

Frequently Asked Questions about Advance Directives

As a caregiver, I can see the changes in my loved one that indicate it may be time for help with medical and financial decisions, but I am not sure where to begin.

As a caregiver, do I need formal documents to be able to make financial or medical decisions or can I just take charge?

You cannot take charge of your relative's financial or medical decisions without permission. In your role as caregiver, you can provide assistance in a number of ways – but only up to a point. Depending on the type of assistance needed, a power of attorney or other legal authority might be required. As a caregiver, it is important that you understand the nature and consequences associated with these powers. Keep in mind that a caregiver is not obligated to assume this responsibility.

What is Power of Attorney?

A power of attorney is a powerful tool that allows one individual to appoint another individual to act on his/her behalf. The individual granting the authority is called the "principal" and the individual acting at the principal's request is known as the "agent" or "attorney-in-fact."

Since 1997, Arizona law requires that a power of attorney be used solely for the benefit of the principal and prohibits the agent from benefiting as a result of the power of attorney. The power of attorney does not create an authority to act against the wishes of the principal. If the agent disagrees with the principal, it is the principal whose instructions should be followed. This means that an agent cannot and should not go against the express wishes of the principal.

In order to allow an agent to act on behalf of someone who was competent when he or she created the power of attorney but is no longer competent, a Power of Attorney must contain some language that makes it "durable." A "Durable Power of Attorney" is one that contains words such as "this power of attorney shall not be affected by my disability or lack of mental competence" and the power will remain in effect even if the principal becomes disabled or incompetent. This should not be interpreted to mean that an agent can act against the wishes of the principal, but merely that he/she can act should the principal be unable to act.

Where and how does a caregiver start when concerned about a relative's ability to adequately handle finances and medical decisions?

Begin by asking your relative if he or she has already prepared documents that designate another person to assist him or her with medical and financial decisions. If your relative has not, open a discussion to

determine if he or she is willing to accept assistance from you. Keep in mind that all adults have the right to refuse assistance, even if doing so may not be in his or her own best interest.

Power of attorney forms are available at many office supply stores, as well as online, and can be filled out without an attorney. Health Care POA, Living Will, Mental Health POA, and Pre-Hospital Medical Directive forms are available on the Arizona Attorney General's website at www.azag.gov/seniors/life-care-planning. Pima Council on Aging recommends hiring an attorney for help with Financial POA forms because of the potential for abuse and/or mismanagement and because an attorney can explain the positive and negative aspects of powers of attorney. Your relative's bank may also have their own specific forms to be completed to designate who can handle the bank account on your relative's behalf and under what circumstances.

For a list of attorneys who specialize in Elder Law, call Pima Council on Aging at (520) 790-7262. You can also meet with an attorney for 30 minutes at a cost of \$35 through the Lawyer Referral Service. Call (520) 623-4625.

What if my relative cannot find the previously prepared documents or does not remember if he or she has any?

Obtain permission from your relative to contact family members, friends, physicians, and his or her attorney to see if anyone can confirm the existence of these documents.

What if my relative does not have a Power of Attorney?

A person must understand the meaning of the Advance Directive forms at the time he or she signs them for the documents to be valid. If your relative is no longer competent to appoint a POA or manage his or her own affairs, there may be other alternatives such as Representative Payee programs or using the medical surrogate statutes to help care for the principal. In some cases, a guardianship, which requires court approval, may be the only alternative once the principal is determined to no longer be competent. If there is any question as to the competency of the principal, be sure that documentation of competency such as letters from the principal's doctor or other witnesses are maintained.

If a person has Power of Attorney documents, why would a Guardianship proceeding be necessary?

Power of Attorney documents are very helpful, but only as long as the person agrees to cooperate. If the person has prepared these directives but chooses not to comply with the plan or decisions being made by the "agent," then it may become necessary to Petition for Guardianship. A Guardianship is a formal court proceeding. The person must be notified of the hearing and an attorney appointed to present his or her point of view to the court. If the court finds the person unable to make or communicate responsible decisions, a Guardian or Conservator is appointed to manage the person's affairs even if he or she objects to the decisions.

What if my relative wants to change his or her Power of Attorney or Living Will?

If your relative changes his or her mind about the power of attorney, he or she can revoke it by filling out a Revocation of Power of Attorney form, having it notarized, and then providing copies of it to the now-former representative and any health care providers, banks or other institutions that received a copy of the original paperwork. Your relative can then complete and distribute new documents indicating his or her current wishes.

Resources

For a list of attorneys who belong to the Tucson Chapter of the National Academy of Elder Law Attorneys (NAELA), contact Pima Council on Aging: (520) 790-7262.

Arizona Office of the Attorney General, Life Care Planning Information & Documents:
(602) 542-2124 or www.ag.state.az.us.

Lawyer Referral Service: (520) 623-4625

Alternatives to Guardianship

Direct Deposit-Automatic Bill Pay

Benefits

- a. Paying bills is a frequent issue
- b. Social Security requires direct deposit anyway
- c. Assures the money is in the account
- d. Direct pay on recurring bills saves time and postage and makes sure utilities, rent or mortgage are always paid

Joint Accounts

Benefits

- a. “And” accounts require two signatures
- b. Simplifies bill paying for family members when the client becomes incapacitated.

Risks

- a. Any person named on a joint or convenience account can empty the account

Durable Financial Power of Attorney

Advantages

- a. Avoids guardianship
- b. Cuts costs
- c. Helps family members

Disadvantages

- a. Lack of monitoring
- b. Unclear standards for agent conduct
- c. Lack of awareness of risk
- d. Broad decision-making authority

Representative Payee

- a. Social Security or Veterans Administration
- b. Provides due-process protection
- c. The doctor must provide verification of incapacity
- d. Notice to the beneficiary
- e. SSA makes the appointment

Trusts

- a. Trust is an entity that can own, buy, sell and manage assets.
- b. A trust can provide for successor trustees and set conditions for trustees taking over.
- c. A trustee is less likely to be challenged in legal authority.

Money Management Services

- a. PCOA has a money management program.
- b. Clients must agree to it, and can leave the program anytime they want to.
- c. Money-managers are not decision makers.

Elder Abuse, Neglect and Exploitation

The Adult Protective Services (APS) statutes define the allegations that APS is mandated to investigate as:

Abuse: The intentional infliction of physical harm. This includes, injury caused by negligent acts or omissions, unreasonable confinement and sexual abuse/assault.

Signs & Symptoms of abuse include but are not limited to:

- Bruises, black eyes, welts, lacerations, and rope marks
- Bone fractures, broken bones, and skull fractures
- Open wounds, cuts, punctures, untreated injuries in various stages of healing
- Sprains, dislocations, and internal injuries/bleeding
- Broken eyeglasses/frames, physical signs of being subjected to punishment, and signs of being restrained
- Laboratory findings of medication overdose or under-utilization of prescribed drugs
- An elder's report of being hit, slapped, kicked, or mistreated
- An elder's sudden change in behavior
- The caregiver's refusal to allow visitors to see an elder alone
- Injury not cared for properly or delays in seeking care or treatment
- Unexplained injuries in places they would not be expected, or in the shape of an object, such as a hand, cord, iron, etc.
- Explanation of injuries not consistent with the injury or its location

Signs and symptoms of sexual abuse include but are not limited to:

- Bruises around the breasts or genital area
- Unexplained venereal disease or genital infections
- Unexplained vaginal or anal bleeding
- Torn, stained, or bloody underclothing
- An elder's report of being sexually assaulted or raped

Neglect: A pattern of conduct without the person's informed consent resulting in deprivation of food, water, medication, medical services, shelter, cooling, heating or other services necessary to maintain minimum physical or mental health.

Sign and symptoms of neglect include but are not limited to:

- Dehydration, malnutrition, untreated bed sores, and poor personal hygiene
- Unattended or untreated health problems
- Hazardous or unsafe living condition/arrangements (e.g., improper wiring, no heat, or no running water)

- Unsanitary and unclean living conditions (e.g. dirt, fleas, lice on person, soiled bedding, fecal/urine smell, inadequate clothing)
- An elder's report of being mistreated

Exploitation: The illegal or improper use of an incapacitated or vulnerable adult or his/her resources for another's profit or advantage.

Signs & symptoms of exploitation include but are not limited to:

- Sudden changes in bank account or banking practice, including an unexplained withdrawal of large sums of money by a person accompanying the elder
- The inclusion of additional names on an elder's bank signature card
- Unauthorized withdrawal of the elder's funds using the elder's ATM card
- Abrupt changes in a will or other financial documents
- Unexplained disappearance of funds or valuable possessions
- Substandard care being provided or bills unpaid despite the availability of adequate financial resources
- Discovery of an elder's signature being forged for financial transactions or for the titles of his/her possessions
- Sudden appearance of previously uninvolved relatives claiming their rights to an elder's affairs and possessions
- Unexplained sudden transfer of assets to a family member or someone outside the family.
- The provision of services that are not necessary
- An elder's report of financial exploitation
- The alleged victim is being asked to sign financial documents, e.g., Powers of Attorney
- The victim may show up to the bank with an individual who is waiting outside while the client withdraws cash

Vulnerability: A mental or physical impairment that prevents the vulnerable adult from protecting themselves. The person lacks sufficient understanding to make or communicate informed decisions. At times it could be due to mental illness, physical illness or chronic use of drugs or intoxication.

Signs & Symptoms of vulnerability include but are limited to:

- The vulnerable adult does not understand his/her situation
- The vulnerable adult is not realistic about the consequences of his/her situation
- The vulnerable adult is unaware of resources and unable to access resources due to dementia/confusion or other impairments
- The vulnerable adult is dependent on others for his/her care or management of finances

The following two allegations are not in the APS statutes but are investigated through internal policy authority.

Self-Neglect: (This is not a legal definition): An adult's inability due to physical or mental impairment or diminished capacity, to perform essential self-care tasks, including:

- Obtaining essential food, clothing, shelter, and medical care
- Obtaining goods and services necessary to maintain physical health, mental health or general safety
- Managing one's own financial affairs

Signs & symptoms of self-neglect include but are not limited to:

- Dehydration, malnutrition, untreated or improperly attended medical conditions, and poor personal hygiene
- Hazardous or unsafe living conditions/arrangements (e.g., improper wiring, no indoor plumbing, no heat, no running water)
- Unsanitary or unclean living quarters (e.g., animal/insect infestation, no functioning toilet, fecal/urine smell)
- Inappropriate and/or inadequate clothing, lack of the necessary medical aids (e.g., eyeglasses, hearing aids, dentures)
- Grossly inadequate housing or homelessness

Emotional Abuse: A pattern of ridiculing or demeaning a vulnerable adult, making derogatory remarks to a vulnerable adult, verbally harassing a vulnerable adult or threatening to inflict physical or emotional harm on a vulnerable adult.

Signs & symptoms of emotional abuse include but are not limited to:

- Verbal assaults, insults, threats, intimidation, humiliation, and harassment
- Isolating an elderly person from his/her family, friends, or regular activities
- Being extremely withdrawn and non-communicative or non-responsive
- An elder's report of being verbally or emotionally mistreated

What is the best way to make a report? Online reporting: www.azdes.gov/reportadultabuse

- Available 24 hours a day, 7 days a week
- Enter report at your own pace
- No waiting for next available agent
- Report is in your own words

Telephone reporting: (877) 767-2385

- Talk to a live person
- Can make anonymous report
- Will receive feedback about your report (accepted or not)
- Monday-Friday 7am - 7pm / Sat-Sun 10am - 6pm

What should a person expect when he or she makes a report?

The reporter will be asked a multitude of questions about:

- The vulnerable adult (potential victim)
- The alleged perpetrator
- Significant others
- Reporting source
- Dangerous animals, weapons, diseases, etc.
- Description of incident (abuse, neglect and/or exploitation)
- How is the client vulnerable (what prevents the victim from protecting themselves?)

What are the criteria that would lead APS to launch an investigation?

The client is being abused, neglected or exploited and is vulnerable.

When would APS decline to launch an investigation?

When there are no allegations and the client has no vulnerability that prevents him/her from protecting him/herself.

What type of feedback should the person making the report expect?

Whether the case will be accepted for investigation or not.

What principles or examples might make clear to an individual when a report should not be made?

- Suicide threat/attempts (should be reported to law enforcement)
- Theft as opposed to exploitation
- The adult is not vulnerable
- Psychotic behavior, i.e. hallucinations, delusions, etc. (these types of situations should be referred to a mental health agency/crisis team)

Is there a second level of reporting if an individual is concerned that his or her report was not handled appropriately?

- Hotline supervisor: 602-542-4307.
- APS Operations Manager: 602-364-1567
- Program Administrator: 602-542-6459.

How do APS and local law enforcement collaborate?

APS makes referral to law enforcement.

APS works closely with law enforcement by conducting joint investigations and sharing case information. At times law enforcement will request that APS not interview certain individuals in an investigation until they do.

Is there ever a time when the reporter should go to law enforcement rather than APS?

All crimes should be reported to law enforcement due to the critical and essential need to preserve evidence. Law enforcement and APS do not have the same burden of proof and the burdens of proof are for different purposes.

- APS has a Preponderance of Evidence (burden of proof) which is used to substantiate cases and move forward with the due process for the alleged perpetrator. The due process consists of an Administrative Hearing for the alleged perpetrator to see if the hearing officer affirms the APS findings so that the perpetrators name is placed on the APS Registry for 10 years.
- Law enforcements' burden of proof is much higher due to the possibility of criminal charges and prosecution.

Are there consequences for mistreatment of vulnerable adults?

Aside from Criminal and Civil penalties, anyone with a substantiated case of mistreatment could potentially have his/her name placed on the APS Central Registry. The case may go before an Administrative Law Judge for determination of the substantiation. If it is affirmed, the accused person's name will be placed on a Central Registry for 10 years, which is open to the general public upon written request for the information. Potential employers could request information about an individual they are considering for hire, therefore impacting a person's employment.

Who is required to report mistreatment of vulnerable adults?

By law, a physician, registered nurse practitioner, hospital intern or resident, surgeon, dentist, psychologist, social worker, peace officer or other person who has responsibility for the care of a vulnerable adult and who has a reasonable basis to believe that abuse or neglect of the adult has occurred or that exploitation of the adult's property has occurred shall immediately report or cause reports to be made of such reasonable basis to a peace officer or to a protective services worker. The guardian or conservator of a vulnerable adult shall immediately report or cause reports to be made of such reasonable basis to the superior court. All of the above reports shall be made immediately in person or by telephone and shall be followed by a written report mailed or delivered within forty-eight hours or on the next working day if the forty-eight hours expire on a weekend or holiday. The report source will be held confidential, except as provided by law and reporters are immune from civil or criminal liability unless the report was made in bad faith or with malice.

What are the limitations of APS?

- While APS will attempt to assist the victim to alleviate mistreatment, prevent further harm, and seek community resources, APS does not have the authority to take custody of an adult or his/her finances.
- APS cannot remove the adult from his/her environment (living situation) against his/her will or require the adult to accept services, including Adult Protective Services.
- APS staff cannot serve as guardian/conservator.

Source: Adult Protective Services www.azdes.gov/daas/aps

Watchdog Alert

October 17 2013



Protect Yourself from Identity Theft & Fraud

There are a number of things you can do to protect you and your loved ones from online or offline identity theft and fraud:

Protect Your Social Security Number (SSN) & Personal Information

- ⇒ Don't carry your Social Security card in your wallet.
- ⇒ Don't print your SSN or driver's license number on your checks.
- ⇒ Shred sensitive information.
- ⇒ Limit the number of credit cards you carry.
- ⇒ Keep copies of credit cards (front and back) in a safe place in case a card is lost or stolen.

Monitor Your Bills & Financial Accounts

- ⇒ Watch for missing bills and review your monthly statements carefully.
- ⇒ Contact your creditors if a bill doesn't arrive when expected or includes charges you don't recognize.
- ⇒ Don't invest in anything you are not absolutely sure about. Do your homework on the investment, the company, and the salesperson to ensure that they are legitimate. You can look them up at finra.org/BrokerCheck and sec.gov.

Watch Over Your Credit Reports

- ⇒ You are entitled to one free credit report each year from each nationwide credit bureau. To get your free report, go to annualcreditreport.com or call 1-877-322-8228.

Protect Personal Identification Numbers (PINs) & Passwords

- ⇒ Don't carry your PINs and passwords in your wallet or purse.
- ⇒ Avoid using easily available information for your PINs or passwords such as your mother's maiden name, your or a family member's birth date, your SSN or phone number, or a series of consecutive numbers (i.e., 1, 2, 3, 4).
- ⇒ Choose a different PIN for each account.

Watchdog Alerts / Tips & Resources / Free for Everyone



Protect Your Information Online

- ⇒ Beware of emails that claim to come from a bank, Internet Service Provider, business or charity and ask you to confirm your personal information or account number. If you receive one that is suspicious, forward the email to spam@uce.gov.
- ⇒ Avoid conducting personal or financial business on shared/public computers or over public wireless hotspots.
- ⇒ Install the latest version of established anti-virus software.
- ⇒ Make sure websites are secure, especially when shopping online. A secure website will begin with "https" not the usual "http".

Protect Your Mail

- ⇒ Call 1 (888) 5-OPT-OUT or visit optoutprescreen.com to stop pre-approved credit card applications that a thief could steal and use to get credit in your name.
- ⇒ Place outgoing mail into a locked mailbox such as a blue postal service box.
- ⇒ Don't leave incoming mail sitting in an unlocked mailbox.
- ⇒ Cut down on junk mail by contacting the Direct Marketing Association at dmachoice.org.

Be Cautious of Scams & Frauds

- ⇒ Never give personal information to telemarketers who call you on the phone. To cut down on unwanted telemarketing calls, sign up for the Do Not Call Registry at donotcall.gov or call (888) 382-1222.
- ⇒ Double-check references for door-to-door sales, home repair offers and other products. Verify that businesses and others who contact you are who they claim to be before you provide any personal information. If you think the request for information is legitimate, contact the company at a number you know is valid to verify the request.
- ⇒ Check out a charity before donating to make sure they are legitimate at charitywatch.org or charitynavigator.org.



For more information about the latest scams, visit:

aarp.org/fraudwatchnetwork



Who to Contact

There are a number of places you can turn to if you or someone you love has been a victim of fraud or identity theft or if you are just looking to learn more about how to safeguard against them:

Fraud Watch Network

The AARP Fraud Watch Network provides you with access to information about identity theft, investment fraud and the latest scams. Access online at: aarp.org/fraudwatchnetwork

Fraud Fighter Call Center

Highly trained AARP volunteer Fraud Fighters are standing by to offer peer counseling, support and referral services to fraud victims and their family members. Call toll-free: **877-908-3360**

The National Association of Attorneys General (NAAG)

The NAAG site provides contact information for all state attorneys general. Most state attorneys general welcome consumer inquiries and complaints about frauds occurring in the marketplace and many offer complaint mediation services as well. Access online at: naag.org

FINRA Investor Education Foundation

The FINRA Investor Education Foundation provides critical information about how to avoid investment fraud, including allowing you to check to see if a broker or a particular investment advisor is registered. It is particularly helpful in addressing a variety of investment frauds such as gold coins and oil and gas scams. Access online at: saveandinvest.org

The North American Securities Administrators Association (NASAA)

This website is where you can find your local state securities regulator, who takes complaints against brokers and dealers that may have engaged in investment fraud. Find your regulator online at: nasaa.org

U.S. Postal Inspection Services

This site, sponsored by the U.S. Postal Inspection Service, has information about how to protect yourself from mail fraud and how to identify when you've been targeted. Access online at: deliveringtrust.com

Federal Trade Commission (FTC) Consumer Help

Call the Federal Trade Commission to file a complaint against a company if you feel you have been defrauded. Call toll-free [877-701-9595](tel:877-701-9595) or visit ftccomplaintassistant.gov

Securities and Exchange Commission (SEC)

The SEC is a good resource for checking up on an investment adviser and investment products. Call toll-free [800-SEC-0330](tel:800-SEC-0330) or visit sec.gov/investor or investor.gov

Consumer Financial Protection Bureau

If you have a complaint about fraudulent activity involving a bank account or service, credit reporting, debt collection, among other areas, contact the CFPB to file a complaint. File online at: consumerfinance.gov/complaint

National Association of Insurance Commissioners

Visit the NAIC website if you want to reach a state insurance agency about an insurance product or salesperson. Find your state at: naic.org/state_web_map

Commodity Futures Trading Commission (CFTC)

The CFTC can assist with problems in commodity futures, precious metals, and foreign currency trading. Call [866-366-2382](tel:866-366-2382) or visit cftc.gov/consumerprotection



