

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION
July 5, 2006

Administrative Proceeding
File No. 3-12355

In the Matter of)	ORDER INSTITUTING PUBLIC
VERITAS FINANCIAL ADVISORS,)	ADMINISTRATIVE AND CEASE-AND-
LLC, VERITAS ADVISORS, INC.,)	DESIST PROCEEDINGS AND
PATRICK J. COX and)	NOTICE OF HEARING PURSUANT TO
RITA A. WHITE,)	SECTION 21C OF THE SECURITIES
Respondents.)	EXCHANGE ACT OF 1934 AND
)	SECTIONS 203(e), 203(f) AND 203(k)
)	OF THE INVESTMENT ADVISERS
)	ACT OF 1940

I.

The Securities and Exchange Commission (“Commission”) deems it appropriate and in the public interest that public administrative and cease-and-desist proceedings be instituted against: Veritas Financial Advisors, LLC, pursuant to Sections 203(e) and 203(k) of the Investment Advisers Act of 1940 (“Advisers Act”); Veritas Advisors, Inc., pursuant to Section 21C of the Securities Exchange Act of 1934 (“Exchange Act”) and Sections 203(e) and 203(k) of the Advisers Act; Patrick J. Cox, pursuant to Section 21C of the Exchange Act and Sections 203(f) and 203(k) of the Advisers Act; and Rita A. White, pursuant to Section 21C of the Exchange Act and Section 203(f) of the Advisers Act.

II.

After an investigation, the Division of Enforcement alleges that:

A. RESPONDENTS

1. **Veritas Financial Advisors, LLC** (“Veritas Financial”), a Massachusetts limited liability company, is located in Boston, Massachusetts. Veritas Financial was formed on or about January 30, 2004, and it has been registered with the Commission as an investment adviser pursuant to Section 203(a) of the Advisers Act since on or about March 4, 2004.

2. **Veritas Advisors, Inc.** (“Veritas Advisors”), a Massachusetts corporation, is located in Boston, Massachusetts. Veritas Advisors was formed on or about November 2, 1993,

and was registered with the Commission as an investment adviser pursuant to Section 203(a) of the Advisers Act from at least August 31, 1998 through July 31, 2001, when the Commission canceled its registration because Veritas Advisors ceased making requisite filings with the Commission. Thereafter and through at least April 2005, Veritas Advisors continued to be an investment adviser within the meaning of Section 202(a)(11) of the Advisers Act.

3. **Patrick J. Cox** (“Cox”), age 50, resides in Wellesley, Massachusetts. Cox has been the sole owner and principal of both Veritas entities since their formation, and at all relevant times he was a person associated with an investment adviser pursuant to Section 202(a)(17) of the Advisers Act. He is a licensed Certified Public Accountant in the State of Ohio, although his license is inactive.

4. **Rita A. White** (“White”), age 37, resides in Boston, Massachusetts. Between at least January 1999 and March 2005, White was an employee of Veritas Advisors who performed bookkeeping and other administrative tasks. At all relevant times, White was a person associated with an investment adviser pursuant to Section 202(a)(17) of the Advisers Act.

B. FACTS

Summary

5. This matter involves fraudulent schemes through which Veritas Advisors, Cox and White collectively misappropriated at least \$2,500,000 from a female client, currently age 57 and residing in Brookline, Massachusetts, who sought Veritas Advisors’ services as she was going through a divorce and looking for someone she could trust to manage her financial affairs (the “Client”). From at least March 1998 through March 2005, Cox made unauthorized transfers of at least \$1,200,000 from at least three of the Client’s bank or investment accounts to himself or to Veritas Advisors. From at least January 1999 through March 2005, White misappropriated at least \$1,300,000 from at least one of the Client’s bank accounts for her own use.

6. Both Veritas entities, which were controlled solely by Cox at all relevant times, also fraudulently failed to disclose their precarious financial condition to clients, and they did not maintain certain required books and records for investment advisers. Veritas Advisors also did not maintain proper custody of client funds.

7. As a result of the foregoing conduct, Veritas Financial, Veritas Advisors, Cox and White variously willfully violated or willfully aided and abetted and caused violations of the antifraud and other provisions of the Exchange Act and Advisers Act.

The Veritas Entities and Their Investment Advisory Services

8. From its formation on or about November 2, 1993 until it ceased operating in or about April 2005, Veritas Advisors continuously provided a range of financial and investment advisory services to clients, which included tracking client investments, advising clients on the

tax consequences of investments, selecting, interacting with and evaluating investment managers, paying bills for clients, tax return preparation and tax and estate planning. In the course of providing these services, Cox, as Veritas Advisors' principal, had varying amounts of discretion over client bank and brokerage accounts, including, in some cases, authority to transfer funds from client accounts and purchase or sell securities in client accounts.

9. During the foregoing period, Cox informed Veritas Advisors clients about several investment opportunities in which the clients ultimately invested, including a venture operated by Cox's brother to market instructional golf videotapes, and two hedge funds managed by a college acquaintance of Cox. Some clients discussed potential investments with Cox, as Veritas Advisors' principal, while other clients sought investment advice from Cox.

10. During the foregoing period, clients compensated Veritas Advisors by paying a flat fee for all of its services.

11. In October 1998, the Securities Division of the Secretary of the Commonwealth of Massachusetts ("Securities Division") entered a consent order against Veritas Advisors and Cox, which found that, from 1994 through 1998, Veritas Advisors and Cox had provided investment advisory services while not being registered as investment advisers. The Securities Division censured them, required them to register with the Securities Division and the Commission, and ordered Veritas Advisors to pay back registration fees and administrative costs.

12. On or about August 31, 1998, Veritas Advisors registered with the Commission as an investment adviser (SEC File Number 801-55833).

13. After 1999, Veritas Advisors ceased making the filings with the Commission which were necessary to maintain its registration as an investment adviser. The Commission canceled Veritas Advisors' investment adviser registration on or about July 31, 2001. Thereafter and through at least April 2005, Veritas Advisors continued to provide the same investment advisory services to clients as described above, and Cox, as Veritas Advisors' principal, had equal or greater discretion over client bank and brokerage accounts.

14. On or about January 30, 2004, Cox formed Veritas Financial as an investment advisory business. Veritas Financial registered with the Commission as an investment adviser on or about March 4, 2004 (CRD Number 130614; SEC File No. 801-62868). It has not withdrawn its registration to date, although it has not made requisite filings with the Commission since at least March 31, 2005.

15. Between at least January 30, 2004 and March 31, 2005, the Veritas entities had some common clients and personnel and provided similar services, and, by their own terms, the code of ethics and compliance manual that Veritas Financial adopted in or about October 2004 also applied to Veritas Advisors employees.

16. On or about March 31, 2005, all employees of Veritas Advisors and Veritas Financial, excluding Cox, resigned.

Misappropriation of Client Funds by Veritas Advisors and Cox

17. Between at least March 1998 and March 2005, there were more than fifty unauthorized transfers of cash, totaling at least \$1,200,000, from at least three of the Client's bank or investment accounts to Veritas Advisors and Cox. These transfers are listed in Exhibit A.

18. The majority of the unauthorized transfers to Veritas Advisors and Cox occurred through checks drawn on the Client's personal checking account ("checking account"), and deposited into either the Veritas Advisors operating account or Cox's personal checking account. Most of the checks were "signed" with a stamp copy of the Client's signature ("signature stamp"). The Client had arranged for Veritas Advisors to pay her household expenses from her checking account, and Veritas Advisors kept the signature stamp at its offices for that purpose. In some cases, Cox, who was a signatory on the Client's checking account, signed the checks.

19. A few of the unauthorized transfers to Veritas Advisors and Cox were made by wire, as reflected in Exhibit A. The wire transfers originated from one of three of the Client's accounts – her checking account, an investment account and, in one instance, a charitable remainder trust account. These transfers occurred pursuant to written requests from Veritas Advisors that were signed by Cox.

20. The Client's investment account ("bond account") consisted of bonds that had to be sold in order to generate cash. During the relevant period, there were at least monthly transfers of cash from the Client's bond account (following the sale of bonds) to her checking account. These transfers all were made by wire at the direction of Veritas Advisors, and Cox signed the wire transfer requests. Cox knew of these transfers and also knew that bonds in the bond account had to be sold in order to generate the cash that was transferred to the checking account and, in some cases, directly to Veritas Advisors and Cox.

21. At all relevant times, Cox continuously withdrew funds from the Veritas Advisors operating account by making checks payable to himself and depositing them into his personal checking account. Therefore, Cox personally benefitted from at least some of the cash transfers from the Client's accounts to Veritas Advisors.

22. The Client did not authorize the transfers to Veritas Advisors and Cox that appear on Exhibit A. Although Cox had limited authority to transfer funds from the Client's accounts (e.g., for the payment of her household expenses), he could not use that authority to transfer funds for his personal benefit or that of Veritas Advisors.

23. During most, if not all, of the foregoing period, the Veritas entities and Cox were experiencing significant financial problems that were reasonably likely to impair their ability to

provide services to clients and that should have been disclosed to clients pursuant to Rule 206(4)-4 of the Advisers Act but were not disclosed. For example, Veritas Advisors' rent for the office space it leased was often in arrears. There also were numerous cash shortfalls in the Veritas Advisors operating account. Veritas Advisors did not have sufficient funds to pay the salaries of its employees for March 2005. Veritas Financial similarly was thinly capitalized and relied on Veritas Advisors to pay all of its expenses, including filing fees for its registration with the Commission as an investment adviser. Veritas Advisors and Cox misappropriated funds from the Client to alleviate these and other financial problems.

Misappropriation of Client Funds by White

24. Between at least January 1999 and March 2005, White misappropriated at least \$1,300,000 from the Client.

25. During the foregoing period, White used an average of at least five checks per month from the Client's checking account for the payment of her own personal expenses. White used many of the checks for the payment of her credit card balances. In turn, White routinely used these credit cards to purchase jewelry, designer clothing and handbags, home improvement items and other non-essential items. White made other of the Client's checks payable directly to herself and deposited these checks into White's personal checking account.

26. All of the above checks, whether to White or her credit card companies, were "signed" with the Client's signature stamp. At all relevant times, White handled bill payment for Veritas Advisors clients who used that service, including the Client, and White had access to the Client's checks and signature stamp. The Client did not authorize White's use of the signature stamp or checks from the Client's account for White's benefit or for the payment of White's expenses.

27. White concealed her unauthorized use of the Client's checks by making entries in an electronic register for the Client's checking account, which White maintained, appear as though these checks were being used to pay the Client's legitimate expenses. For example, many ledger entries erroneously reflect that certain payments, which actually were made to White's credit card companies, were made to one of the Client's credit card companies. Other ledger entries corresponding to checks made payable to White or her credit card companies incorrectly describe the payments as being donations to charitable organizations. Moreover, in or about March and/or April 2005, after the Enforcement Division's investigation began and she became aware of the investigation, White altered additional entries in the electronic register in a further attempt to conceal her unlawful activities.

28. As noted above, during the relevant period, there were at least monthly transfers of cash from the Client's bond account (following the sale of bonds) to the Client's checking account. White knew about these transfers and also knew that bonds in the bond account had to be sold in order to generate the cash that was transferred to the checking account, where it was misappropriated by White. White faxed wire transfer requests from Veritas Advisors to the

bank, and the bank then notified White once the transfers occurred. White also recorded the transfers from the bond account to the checking account in the transaction register for the Client's checking account.

Books and Records and Other Violations

29. Between at least March 1998 and April 2005, the Veritas entities, which were controlled by Cox, did not maintain certain required books and records for investment advisers, including a general ledger and financial statements, pursuant to Rules 204-2(a)(2) and (6) of the Advisers Act.

30. Between at least March 1998 and April 2005, Veritas Advisors, which was controlled by Cox, did not comply with the custody requirements of Rule 206(4)-2 of the Advisers Act. For many clients, Cox, as Veritas Advisors' principal, had discretion over client accounts, including limited authority to transfer funds from client accounts and sell bonds in client accounts. Veritas Advisors also received copies of clients' brokerage and bank account statements. However, Veritas Advisors did not send account statements to clients as often as required by the custody rule, if at all. Veritas Advisors also kept physical stock certificates at its offices, instead of with a qualified custodian, as required by the rule.

31. Between at least July 31, 2001, when it ceased being registered with the Commission as an investment adviser, and April 2005, Veritas Advisors, which was controlled by Cox, was in the business of providing investment advice for compensation without being registered with the Commission as required by Section 203(a) of the Advisers Act and rules thereunder. During the foregoing period, Veritas Advisors had at least fifteen clients and at least \$25,000,000 in assets under management, and no statutory exemptions from the registration requirement or prohibitions on registration applied.

C. VIOLATIONS

Exchange Act Violations

32. As a result of the conduct described above, Respondents Veritas Advisors, Cox and White willfully violated Section 10(b) of the Exchange Act and Rule 10b-5 thereunder, which prohibit fraudulent conduct in connection with the purchase or sale of securities. By misappropriating funds from the Client's accounts, Veritas Advisors, Cox and White all engaged in fraud in violation of these provisions.

33. As a result of the conduct described above, Respondent Cox willfully aided and abetted and caused Veritas Advisors' violations of Section 10(b) of the Exchange Act and Rule 10b-5 thereunder by effectuating unauthorized transfers of cash from the Client's accounts to Veritas Advisors and/or himself.

Advisers Act Violations–Antifraud Provisions

34. As a result of the conduct described above, Respondents Veritas Advisors and Cox willfully violated Sections 206(1) and 206(2) of the Advisers Act. Section 206(1) of the Advisers Act prohibits an investment adviser from, directly or indirectly, employing any device, scheme or artifice to defraud any client or prospective client. Section 206(2) of the Advisers Act prohibits any transaction, practice or course of business which operates as a fraud or deceit upon any client or prospective client. Veritas Advisors was an investment adviser at all relevant times and owed a fiduciary duty to its clients, including the Client. By making unauthorized transfers of cash from the Client's accounts, Veritas Advisors, acting through Cox, breached its fiduciary duty and willfully violated Sections 206(1) and 206(2). Veritas Advisors is liable for Cox's misappropriation of funds from the Client's accounts because Cox's knowledge, intent and conduct can be imputed to Veritas Advisors. Cox is directly liable for primary violations of Sections 206(1) and 206(2) for his misappropriation of funds from the Client.

35. As a result of the conduct described above, Respondent Cox willfully aided and abetted and caused Veritas Advisors' violations of Sections 206(1) and 206(2) of the Advisers Act by effectuating unauthorized transfers of cash from the Client's accounts to Veritas Advisors.

36. As a result of the conduct described above, Respondents Veritas Financial and Veritas Advisors, acting through Cox, willfully violated Section 206(4) of the Advisers Act and Rule 206(4)-4 thereunder. Section 206(4) of the Advisers Act prohibits investment advisers from engaging in acts, practices or courses of business which are fraudulent, deceptive or manipulative, as defined by rules and regulations thereunder. Rule 206(4)-4 requires investment advisers registered or required to be registered with the Commission to disclose to clients all material facts with respect to financial conditions that are reasonably likely to impair the adviser's ability to meet contractual commitments to clients if the adviser has discretionary authority or custody over client funds or securities. The Veritas entities met these criteria and had financial difficulties, known to Cox, which should have been disclosed to clients but were not disclosed.

37. As a result of the conduct described above, Respondent Veritas Advisors, acting through Cox, willfully violated Section 206(4) of the Advisers Act and Rule 206(4)-2 thereunder. Rule 206(4)-2 imposes requirements upon investment advisers registered or required to be registered with the Commission concerning custody of client funds or securities. Veritas Advisors did not send required quarterly account statements to at least some clients, and it maintained physical custody of client stock certificates, which instead should have been placed with a qualified custodian.

38. As a result of the conduct described above, Respondent Cox willfully aided and abetted and caused the Veritas entities' various violations of Section 206(4) of the Advisers Act and Rules 206(4)-2 and 206(4)-4 thereunder.

Other Advisers Act Violations

39. As a result of the conduct described above, Respondent Veritas Advisors, acting through Cox, willfully violated Section 203(a) of the Advisers Act, which prohibits investment advisers from making use of the mails or any means or instrumentality of interstate commerce in connection with their business as investment advisers unless they are registered with the Commission. Veritas Advisors ceased being registered as an investment adviser after July 31, 2001, but thereafter and until at least April 2005, it continued to be an investment adviser and to make use of the mails and the means or instrumentalities of interstate commerce in connection with its business as an investment adviser. No statutory exemptions to the registration requirement of Section 203(a), or prohibitions on registration, applied during the relevant period.

40. As a result of the conduct described above, Respondents Veritas Financial and Veritas Advisors, acting through Cox, willfully violated Section 204 of the Advisers Act and Rule 204-2 thereunder. Rule 204-2 requires investment advisers registered or required to be registered with the Commission to maintain and preserve certain books and records, including a general ledger pursuant to Rule 204-2(a)(2) and financial statements pursuant to Rule 204-2(a)(6), which the Veritas entities lacked.

41. As a result of the conduct described above, Respondent Cox willfully aided and abetted and caused the Veritas entities' various violations of Section 203(a) of the Advisers Act and Section 204 of the Advisers Act and Rule 204-2 thereunder.

III.

In view of the allegations made by the Division of Enforcement, the Commission deems it necessary and appropriate in the public interest that public administrative and cease-and-desist proceedings be instituted to determine:

A. Whether the allegations set forth in Section II are true, and to afford the Respondents an opportunity to establish any defenses to such allegations;

B. Whether, pursuant to Section 21C(a) of the Exchange Act, Respondents Veritas Advisors, Cox and White should be ordered to cease and desist from committing or causing violations and any future violations of Section 10(b) of the Exchange Act and Rule 10b-5 thereunder, and whether they should be ordered to pay disgorgement plus prejudgment interest, pursuant to Section 21C(e) of the Exchange Act;

C. Whether, pursuant to Section 203(k)(1) of the Advisers Act, Respondents Veritas Advisors and Cox should be ordered to cease and desist from committing or causing violations and any future violations of Sections 203(a), 206(1), 206(2) and 206(4) of the Advisers Act and Rule 206(4)-2 thereunder;

D. Whether, pursuant to Section 203(k)(1) of the Advisers Act, Respondents Veritas Financial, Veritas Advisors and Cox should be ordered to cease and desist from committing or causing violations and any future violations of Section 204 of the Advisers Act and Rule 204-2 thereunder and Section 206(4) of the Advisers Act and Rule 206(4)-4 thereunder;

E. What, if any, remedial action is necessary and appropriate in the public interest against Respondent Veritas Advisors, pursuant to Sections 203(e) and 203(k) of the Advisers Act, including, but not limited to, disgorgement plus prejudgment interest pursuant to Sections 203(j) and 203(k)(5) of the Advisers Act;

F. What, if any, remedial action is necessary and appropriate in the public interest against Respondents Cox and White, pursuant to Section 203(f) of the Advisers Act, including, but not limited to, disgorgement plus prejudgment interest pursuant to Section 203(j) of the Advisers Act;

G. What, if any, remedial action is necessary and appropriate in the public interest against Respondents Veritas Financial and Veritas Advisors, pursuant to Sections 203(e) of the Advisers Act, including, but not limited to, a civil penalty pursuant to Section 203(i) of the Advisers Act;

H. What, if any, remedial action is necessary and appropriate in the public interest against Respondents Cox and White, pursuant to Sections 203(f) of the Advisers Act, including, but not limited to, a civil penalty pursuant to Section 203(i) of the Advisers Act;

I. What, if any, remedial action is necessary and appropriate in the public interest against Respondents Veritas Financial and Veritas Advisors, pursuant to Section 203(e) of the Advisers Act, including, but not limited to, an order censuring them, placing limitations on their activities, functions or operations, suspending them or revoking their registration as investment advisers; and

J. What, if any, remedial action is necessary and appropriate in the public interest against Respondents Cox and White, pursuant to Section 203(f) of the Advisers Act, including, but not limited to, an order censuring them, placing limitations on their activities or suspending or barring them from being associated with an investment adviser.

IV.

IT IS ORDERED that a public hearing for the purpose of taking evidence on the questions set forth in Section III hereof shall be convened not earlier than 30 days and not later than 300 days from service of this Order at a time and place to be fixed, and before an Administrative Law Judge to be designated by further order as provided by Rule 110 of the Commission's Rules of Practice, 17 C.F.R. § 201.110.

IT IS FURTHER ORDERED that Respondents shall file an Answer to the allegations contained in this Order within twenty (20) days after service of this Order, as provided by Rule 220 of the Commission's Rules of Practice, 17 C.F.R. § 201.220.

If Respondents fail to file the directed answer, or fail to appear at a hearing after being duly notified, the Respondents may be deemed in default and the proceedings may be determined against them upon consideration of this Order, the allegations of which may be deemed to be true as provided by Rules 155(a), 220(f), 221(f) and 310 of the Commission's Rules of Practice, 17 C.F.R. §§ 201.155(a), 201.220(f), 201.221(f) and 201.310.

This Order shall be served forthwith upon Respondents personally or by certified mail.

IT IS FURTHER ORDERED that the Administrative Law Judge shall issue an initial decision no later than 300 days from the date of service of this Order, pursuant to Rule 360(a)(2) of the Commission's Rules of Practice.

In the absence of an appropriate waiver, no officer or employee of the Commission engaged in the performance of investigative or prosecuting functions in this or any factually related proceeding will be permitted to participate or advise in the decision of this matter, except as witness or counsel in proceedings held pursuant to notice. Since this proceeding is not "rule making" within the meaning of Section 551 of the Administrative Procedure Act, it is not deemed subject to the provisions of Section 553 delaying the effective date of any final Commission action.

By the Commission.

Nancy M. Morris
Secretary

Exhibit A

**Unauthorized Transfers from the Client's Accounts
to Veritas Advisors and Cox**

Date	Transfer Method	Source (Account Type)	Recipient	Amount
03/06/98	Check	Checking account	Cox	\$ 50,000
11/30/98	Check	Checking account	Cox	\$ 50,000
12/03/99	Wire	Checking account	Cox	\$ 50,000
06/22/00	Wire	Checking account	Cox	\$ 40,000
07/23/01	Check	Checking account	Cox	\$ 60,000
09/18/01	Check	Checking account	Veritas Advisors	\$ 15,000
11/14/01	Wire	Charitable remainder trust account	Veritas Advisors	\$ 25,000
01/10/02	Check	Checking account	Veritas Advisors	\$ 30,000
05/22/02	Check	Checking account	Veritas Advisors	\$ 35,000
06/24/02	Check	Checking account	Veritas Advisors	\$ 8,000
07/18/02	Check	Checking account	Veritas Advisors	\$ 35,000
07/18/02	Check	Checking account	Cox	\$ 15,000
07/24/02	Check	Checking account	Veritas Advisors	\$ 10,000
10/21/02	Wire	Bond account	Veritas Advisors	\$ 50,000
12/30/02	Check	Checking account	Veritas Advisors	\$ 35,000
01/29/03	Check	Checking account	Veritas Advisors	\$ 25,000
02/20/03	Check	Checking account	Veritas Advisors	\$ 25,000
02/26/03	Check	Checking account	Veritas Advisors	\$ 7,000
03/05/03	Wire	Bond account	Veritas Advisors	\$ 25,000
03/12/03	Wire	Bond account	Veritas Advisors	\$ 20,000
03/20/03	Check	Checking account	Veritas Advisors	\$ 5,000
05/20/03	Check	Checking account	Veritas Advisors	\$ 25,000
06/04/03	Check	Checking account	Veritas Advisors	\$ 1,000
06/05/03	Wire	Bond account	Veritas Advisors	\$ 49,000
06/24/03	Wire	Bond account	Veritas Advisors	\$ 25,000
08/27/03	Check	Checking account	Veritas Advisors	\$ 20,000
09/08/03	Wire	Bond account	Veritas Advisors	\$ 25,000
09/10/03	Check	Checking account	Veritas Advisors	\$ 10,000

Date	Transfer Method	Source (Account Type)	Recipient	Amount
09/24/03	Check	Checking account	Veritas Advisors	\$ 17,500
11/17/03	Check	Checking account	Veritas Advisors	\$ 10,000
11/21/03	Check	Checking account	Veritas Advisors	\$ 25,000
12/01/03	Check	Checking account	Veritas Advisors	\$ 25,000
01/27/04	Check	Checking account	Veritas Advisors	\$ 25,000
02/04/04	Check	Checking account	Veritas Advisors	\$ 20,000
03/03/04	Check	Checking account	Veritas Advisors	\$ 20,000
03/16/04	Check	Checking account	Veritas Advisors	\$ 20,000
04/21/04	Check	Checking account	Veritas Advisors	\$ 3,000
04/27/04	Check	Checking account	Veritas Advisors	\$ 25,000
05/05/04	Check	Checking account	Veritas Advisors	\$ 20,000
05/07/04	Check	Checking account	Veritas Advisors	\$ 12,717
06/07/04	Check	Checking account	Veritas Advisors	\$ 20,000
06/09/04	Check	Checking account	Veritas Advisors	\$ 15,000
06/15/04	Check	Checking account	Veritas Advisors	\$ 10,000
06/17/04	Check	Checking account	Veritas Advisors	\$ 10,000
07/27/04	Check	Checking account	Cox	\$ 10,000
07/29/04	Check	Checking account	Cox	\$ 30,000
08/13/04	Check	Checking account	Cox	\$ 11,000
09/24/04	Check	Checking account	Veritas Advisors	\$ 15,000
09/24/04	Check	Checking account	Cox	\$ 4,000
10/25/04	Check	Checking account	Cox	\$ 35,000
11/10/04	Check	Checking account	Cox	\$ 25,000
12/22/04	Check	Checking account	Cox	\$ 15,000
01/14/05	Wire	Bond account	Veritas Advisors	\$ 25,000
Total				\$1,218,217