

## President's Notes

by Fred Pasteur, CFE



As I write this I am happy to report that we have finalized our speaker selection for the 11<sup>th</sup> Annual Fraud Conference March 19 and 20, 2007. Again, we have been very fortunate to find speakers who not only bring exceptional presentation

skills to our conference; they also bring professional credibility and national recognition in their respective areas. As we move closer to the conference, you'll receive more information on the speakers and their material. Just be sure to get your reservations in as soon as you can after we release the conference brochure. Last year, with the addition of the 70 extra seats outside of the main auditorium, no one was turned away. This is no guarantee however, that seats will be available to everyone interested this year because of the growing interest in our conference. So, to be on the safe side, register early after you receive our mail out.

As we go through this year I'd like each of you to remember just how fortunate you are to be where you are. I was reminded last week of how fortunate I've been while I was watching the Extreme Makeover Home Addition special on Amy Hawkins and her family. The tornado that severely injured Amy last April missed my home in Hendersonville by less than a quarter of a mile. It went through the neighborhood like a giant lawnmower. Amy's family gained national recognition and support for what they endured. Not only was her spine crushed

when she covered her children with her body, but her home was completely destroyed. Having seen the pictures now, it's a miracle that she and her children survived.

Amy's family gained local and national financial support totaling over \$200,000, in addition to receiving a brand new \$250,000 home. As you know, our chapter was a part of that financial assistance. I'm quite sure, however, that the family would gladly give it all back if Amy could only walk again. That is my hope; that someday, technology will enable Amy to walk again. She believes that she will. Keep her, and the other tornado victims, in your thoughts and prayers.

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## Association Update

### Help Us Grow & Help Yourself to Big Prizes!

From now until December 15, 2006, the ACFE will reward chapters for new ACFE members! Chapters can earn great prizes in the following ways:

- Send in **50** new ACFE member applications – win a **\$2,000** cash award plus two free registrations to the ACFE Annual Fraud Conference & Exhibition - Main Conference (July 16-18) in Orlando, FL\*
- Send **40** new ACFE member applications – **\$2,000** plus a free registration to the ACFE Annual Fraud Conference & Exhibition - Main Conference (July 16-18) in Orlando, FL\*
- Send **30** new ACFE member applications - **\$1,500**
- Send **20** new ACFE member applications - **\$1,000**
- Send **10** new ACFE member applications – **\$500**

\*Main Conference fee does not include air travel, lodging, meals, or other expenses.

Here are the rules:

- A completed ACFE application with payment for Associate membership must be submitted. Incomplete applications will not be accepted.
- Applications should be collected by the chapter and sent in together.
- The chapter needs to enclose a cover letter with all applications so the chapter can be properly credited. The cover letter should have the chapter name on it.
- Online applications will be accepted. It is important for tracking purposes that the applicant selects local chapter as the referring entity and they select the correct chapter from the drop down box.
- Only new ACFE member applications will count towards your chapter total. Current member renewals are prohibited. Former members whose membership with the ACFE has lapsed prior to September 30<sup>th</sup> can re-apply and will count.
- **Please note: We must send applications as a chapter, and all applications must be received (not postmarked) by December 15, 2006 Therefore, we must have all applications in to our Treasurer, Kerry Dye, by December 1, 2006.**

This is not only a great way to earn extra money for your chapter, but also an opportunity to help the profession. Chapters will benefit from new members by expanding their expertise and skill set, as well as having a greater pool of officer candidates to choose from in the future.

I'm excited to offer you this opportunity and encourage the chapter board to set goals and devise a game plan. It will take the whole board working together to reach or surpass your goals.

You can download an Associate membership application by visiting <http://www.acfe.com/Membership/membership.asp> and click on 'Apply Now' and select your country.

Be sure to send all completed applications to Kerry Dye, Chapter Treasurer. You can meet with Kerry at chapter meetings or mail them to Kerry Dye, 4 East, 310 Great Circle Road, Nashville, TN 37243.

## September Meeting Minutes

The Middle Tennessee Chapter, Association of Certified Fraud Examiners, met on September 28, 2006, at the Raintree Room of Scarritt-Bennett Center. Chapter President Fred Pasteur called the meeting to order. Fred introduced the board members, then asked members to introduce their guests.

Fred made the following announcements:

- On January 12, 2007, the chapter is offering one full day of free training to all Middle Tennessee Chapter of ACFE members on January 12, 2007 at Nashville State Community College. The speaker will be Cynthia Hetherington, back by popular demand after speaking at our 2006 Fraud Conference about searching for information using computer technology. This training opportunity is also being opened to members of the Institute of Internal Auditors (IIA) and members of the Association of Governmental Accountants (AGA).
- On November 6, 2006, our chapter will have a joint meeting with AGA. The meeting will be held at the Nashville City Club. The luncheon speaker will be News Channel Five personality, Phil Williams. The cost of the luncheon will be \$10.
- On February 22, 2007, we will have a joint meeting with the IIA. More about that meeting will be forthcoming.
- The 11<sup>th</sup> Annual Fraud Conference has been scheduled for March 19 and 20, 2007, at the Willis Conference Center.

Hellens Kruszynski introduced the speakers. Following their presentation, they were presented with a proof set of US Mint coins. Laurantette Ford won the \$25 door prize, and the meeting was adjourned.

## October Speaker

**Richard Littlehale**

**Assistant Special Agent in Charge**

**Technical Services Unit, Tennessee Bureau of Investigation**



Rich Littlehale has been a Special Agent with the Tennessee Bureau of Investigation since 1995. He is currently the Assistant Special Agent in Charge of the Technical Services Unit. In that capacity, he coordinates and supervises the use of advanced and covert technologies in support of law enforcement operations.

From 1998 through 2004, ASAC Littlehale served as Legal Advisor to the Bureau's Drug Investigation Division. He was responsible for providing field and office legal support for TBI criminal investigators and their supervisors, as well as drafting legislation in furtherance of the Drug Division's mission and providing testimony before legislative committees on law enforcement issues.

ASAC Littlehale's work as a criminal investigator has ranged from white collar and environmental crime cases to investigations targeting multi-state drug distribution conspiracies. ASAC Littlehale is a firearms and deadly force instructor, and served as the TBI's Chief Firearms Instructor from 2003 to 2004. ASAC Littlehale represented the TBI on the Tennessee Sexual Offender Treatment and Monitoring Board from 1996 to 1999.

ASAC Littlehale received his bachelor's degree in 1992 from Bowdoin College in Brunswick, Maine, and his law degree in 1995 from Vanderbilt Law School in Nashville, Tennessee. He is an attorney licensed to practice law in Tennessee. ASAC Littlehale is a graduate of the Tennessee Law Enforcement Training Academy and the TBI Basic Criminal Investigation School.

## November Speaker

**Phil Williams**

**Investigative  
Reporter  
Newschannel 5**



"If the press calls, call your PR person. If Phil Williams calls, call your lawyer because you're in trouble." That's how a prominent Nashville political strategist describes the impact of NewsChannel 5's chief investigative reporter.

Business Tennessee magazine has previously listed Phil among its "Power 100" of Tennessee's most powerful people. That's because his stories have uncovered government waste and corruption, exposed sex offenders and other felons teaching children, sent people to prison and prompted legislators to write new laws.

Phil's work has also earned him numerous prestigious national awards. Those include broadcasting's highest honors - the George Foster Peabody Award and the Columbia-duPont Award, both considered equivalents of the Pulitzer Prize - for his investigation of state contracts.

He began his journalism as a newspaper reporter. As a young reporter, in 1990, Phil was a finalist for print journalism's highest honor, the Pulitzer Prize, for an investigation that exposed corrupt state officials and gamblers who had taken over Tennessee's charity bingo industry.

He is an honors graduate of Middle Tennessee State University.

**Note: The November meeting will be a joint meeting with the Association of Government Accountants.**

## Member Profile

**R.C. (Bob) Cleland, CFE**



I was born and raised in Chicago, Illinois with my eight other siblings. After a stint in the service I landed a position at the Internal Revenue Service here in Nashville, where I continued my college education at David Lipscomb University. I knew I wanted to live somewhere south of Chicago because of the cold and snow. After completing my degree, I went to work in the Nashville office of Arthur Andersen and then as a Controller for a durable medical company here in Nashville. As I was gathering my paperwork to enroll in the Georgia State University Masters of Taxation program, I had an opportunity to do some contract work for Peterson Consulting, a subsidiary of Navigant Consulting. The work was mainly forensic accounting work, we were tracing government funds through a company for several years to determine whether the government funds were utilized for other purposes than for which they were intended. I thoroughly enjoyed this type of "accounting" and when asked to join the firm rather than seek my Masters degree, I agreed.

In 2002, I joined LECG, please note that LECG was also a subsidiary of Navigant Consulting when I was a member of that firm. Since that time I have had the opportunity to be involved in large fraud cases around the country. I have been a fraud examiner for over 6 years now and enjoy working in the field every chance I can.

During this time my wife of 33 years and I have raised two children, who in turn have blessed us with 4 grandchildren. When not working I donate time to Habitat For Humanity (built 3 homes), the Nashville Rescue Mission where I serve meals to the homeless and needy families and attend Bellevue Community Church. In addition to the Middle Tennessee Association of Certified Fraud Examiners, I am also a member of the Association of Certified Fraud Examiners, Healthcare Financial Management Association (HFMA) and the Middle Tennessee Healthcare Executive Association (MTHEA).

## Need, Greed, Lust and Trust

by Fred Pasteur, CFE

Why do people steal? Maybe it's because stealing is the least objectionable alternative to meeting their needs, whether perceived or real. What's interesting is when people who don't have to steal do it any way because greed has taken over their lives. And greed, coupled with a position of financial responsibility, perceived need, and lust for what they don't have can sometimes control their lives.

This case demonstrates this point quite well. It involves a trusted employee in a county health department who had a position of considerable responsibility. Part of this responsibility required her to use money appropriated by the county to purchase various health department necessities. Each month she filed a report with the County Executive's office listing the expenses she had incurred that month to be paid by the county.

To expedite the purchasing process several credit accounts were opened; one at Wal-Mart and one as Sam's Club. The accounts were opened in the name of the county government, but the statements were sent to the health department to the attention of the employee. From the statements, she coded the expenditures to county expense codes on a county spread sheet. It didn't take her long to realize that the county would pay anything she brought them as long as it was coded to a county-approved expense account. Katy, Bar the Door!!!

To make a long story short: She began to use the two credit cards to make personal purchases. Although she was supposed to send the statement detail to the county each month, she learned she could cut out the personal purchases, submit a copy, no one at the county noticed. The county employee who paid the bills was just too busy to pay much attention. She felt that since the state was involved, it had to be all right. However, finally, a fatal mistake occurred. The employee left a Wal-Mart statement on her desk at the health department, and it was

discovered by another employee. The statement contained purchases of clothing, eye makeup and lipstick. Shortly thereafter, the Office of Internal Audit received a copy of this statement and the investigation began.

The investigation revealed that the embezzlement had been going on for over two years right under the noses of the county government and the health department director. Initially, it was a shock to everyone that this employee, who had a stellar reputation in the community, could and would, do something like this. The review of available documents determined that over \$7,000 was used by this employee for personal purchases.

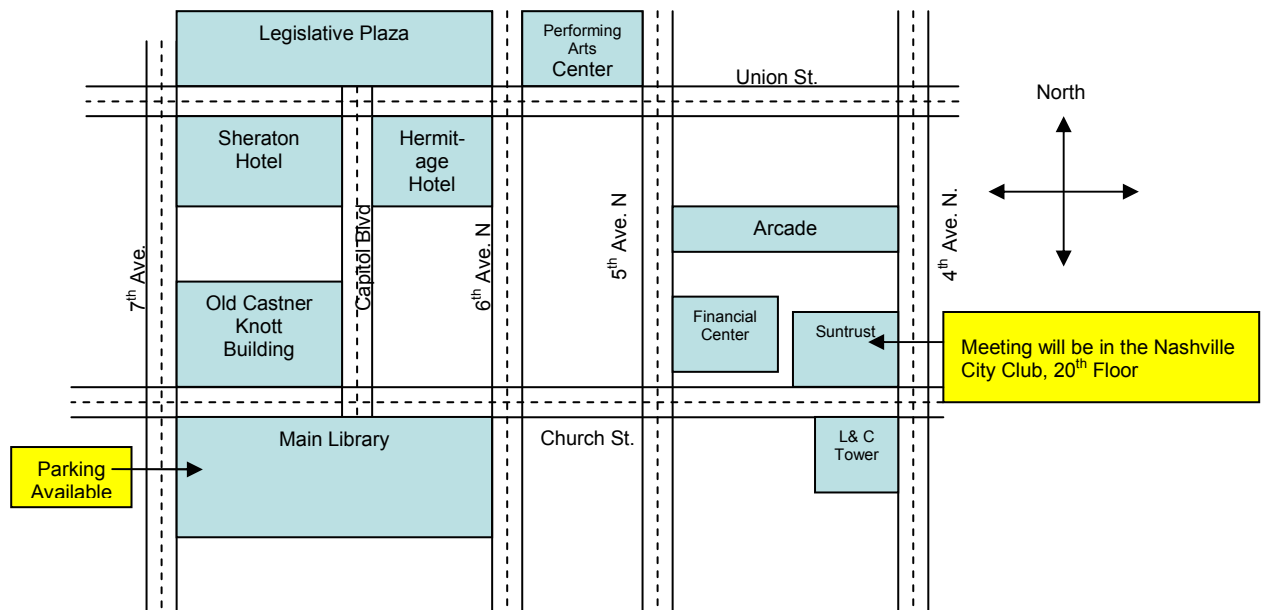
The employee resigned before the investigation began because she saw the writing on the wall. After being contacted by the Office of Internal Audit, she agreed to an interview where she admitted the ongoing theft. She agreed to repay whatever was identified as personal purchases.

Summary: This 15 year career employee lost her state annual leave benefits with a value of over \$4,000, she lost respect in the community where she had been a member of the school board, she lost her family's respect and most importantly, she lost her self respect. The county grand jury will meet November 8, 2006, to review the matter and consider an indictment. This former employee has fallen about as far as she can go, and all for \$7,000. In her words: "I am a good person and good people occasionally make wrong choices." She certainly made a wrong choice.

## November Luncheon Information

★★★★Please Note!★★★★

The November luncheon meeting will be held jointly with the Association of Government Accountants (AGA) on November 2<sup>nd</sup>. We will meet at their usual meeting place, the Nashville City Club, which is located on the 20<sup>th</sup> Floor of the SunTrust Bank Building. The Suntrust Bank Building is at the corner of 4<sup>th</sup> Avenue and Church Street in downtown Nashville. **Please note that reservations are due one day earlier than usual, no later than 9:30 a.m., October 30, 2006. Cost for the meeting will be \$10.** Please make your reservations through Doreen Zientar, as usual. You can reach Doreen at [dzientar@deloitte.com](mailto:dzientar@deloitte.com) or at 882-7179. Parking is available at the downtown library. The first hour of parking is free when you have your ticket validated at the security desk just inside the main library doors. A fee schedule for extra library parking is shown below. The chapter will reimburse reasonable parking expenses for members attending the meeting. The entrance to the library parking garage is on 7<sup>th</sup> Avenue, just South of the intersection of 7<sup>th</sup> Avenue N. and Church Street. A map is provided below to assist you in finding the meeting location.



### MAIN LIBRARY PARKING RATES:

- First hour of parking: FREE
- 1 - 1.5 hours: 75¢
- 1.5 - 2 hours: \$1.50
- 2 - 2.5 hours: \$2.50
- 2.5 - 3 hours: \$3.50
- 3 - 3.5 hours: \$4.50
- More than 3.5 hours: \$5.00 (the daily maximum for those who park before 5:00 p.m. on weekdays)

## Annual Conference Contest Point System

The 18<sup>th</sup> Annual ACFE Fraud Conference is scheduled to be held in Orlando, Florida in July 2007. Once again, the Middle Tennessee Chapter will hold its annual contest to win an all-expense paid trip to the conference. You can earn points to compete for the trip according to the following schedule. Please remember that each member is responsible for accumulating his or her points and submitting the total number and the accompanying documentation at the conclusion of the contest.

| <u>Category</u>  | <u>Points</u>                      |
|--|------------------------------------|
| Attending Monthly Chapter Meeting                                    | 1 point per meeting                |
| Publish Article in Chapter Newsletter                                | 2 points                           |
| Sponsoring a New Member  | 2 points per new member            |
| Publish member profile in Chapter Newsletter                         | 1 point                            |
| Contribution to "Been There, Said That, Done That"                   | 1 point per contribution per Month |
| Publication of Case Results  | 2 points                           |
| Participating as a speaker in the Chapter Speaker's Bureau           | 2 points per engagement            |
| Publication of an article in the Association's <i>Fraud Magazine</i> | 3 points                           |
| Attending the Chapter's 11 <sup>th</sup> Annual Conference           | 2 points                           |
| Service on Chapter Committee   | 2 points                           |

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## Free Day of Training Friday, January 12, 2007

Cynthia Hetherington, who presented ***Protecting Your Product Using Open Sources & Proprietary Data Bases*** at our 10<sup>th</sup> Annual Fraud Conference, is returning by popular demand. This full day of training will be held at Nashville State Community College (formerly Nashville Tech), and is free to Middle Tennessee Chapter, ACFE members. We will establish a registration process closer to time. Mark your calendars and don't forget to come!



## In The News . . .

### Congressional Testimony

**Statement of  
Steven M. Martinez  
Assistant Deputy Director, Cyber Division  
Federal Bureau of Investigation  
Before the  
House Committee on Small Business  
Regulatory Reform and Oversight Subcommittee  
March 16, 2006**

As retail business moves to the world of e-commerce, cyber crime will follow. In 2000 e-commerce accounted for 1 percent of all retail sales. Today it accounts for 2.4 percent of all sales. This upward trend will undoubtedly continue. Adding to this the revenue generated by non-retail Internet businesses, such as media and entertainment; e-commerce will soon dominate all commercial activity worldwide. The FBI is committed to investigating threats at all levels against this major force in our economy.

Small business forms a vital link in the overall security of the Internet. First, small business accounts for a significant portion of the retail business occurring on the Internet. Many online businesses and e-retailers are small businesses, many small businesses are customers of online businesses, and still other small businesses support the IT and Internet operations of large businesses and the government. Second, the integrity of Internet-connected small-business systems has an impact on the security of the Internet as a whole.

The FBI has recognized that the best way to combat the growing threat of cyber crime is to form a partnership with businesses and industries that rely on the Internet for their success. By teaming up with the private sector the FBI is able to find out what issues affect business and what problems are causing the most harm. This has allowed us to focus our efforts on the major problems affecting the Internet.

Further, through our outreach and information-sharing initiatives, we are able to share our experiences with members of the business community so that they can better protect and defend themselves against new and evolving cyber threats. The education of small businesses about the scope and nature of cyber threats is an important first step in protecting those businesses.

The FBI has two initiatives focused on building a partnership with business: the National Cyber-Forensics and Training Alliance (NCFTA) and InfraGard.

The NCFTA is a first-of-its-kind public-private alliance located in Pittsburgh, Pennsylvania. At the NCFTA members of law enforcement work side-by-side with representatives from business on addressing the latest and most significant cyber threats. Through this collaboration the FBI has been able to identify and prosecute some of the most serious cyber criminals, including those who distribute computer viruses, operate large networks of compromised computers (known as botnets), and perpetrate fraud schemes such as phishing scams.

The NCFTA is strategically located near Carnegie Mellon University's Computer Emergency and Response Team/Coordination Center and is also within driving distance of the FBI's Internet Crime Complaint Center (IC3).

As an example on how we address cyber complaints, the NCFTA was recently contacted by a small bank in New Jersey. The bank was the victim of a phishing attack. In this type of attack the criminal creates a fake website that is identical to the real bank site and uses the fake site to steal credit card and other identity information from the bank's customers. With the victim bank to help them, the NCFTA traced the attack to its source and identified what measures they could take to mitigate the effects of this attack. With the help of the

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NCFTA, the bank was able to send "cease and desist" letters to the Internet service providers hosting the fake sites in order to have the sites shut down.

InfraGard is an alliance between the FBI and the public whose mission is to prevent attacks, both physical and electronic, against critical infrastructure including, but not limited to banks, hospitals, telecommunications systems and the Internet. InfraGard has over 14,800 private sector members spread across 84 local chapters throughout the United States.

These private sector partners represent the full spectrum of infrastructure experts in their local communities. FBI agents assigned to each chapter bring meaningful news and information to the table such as threat alerts and warnings, vulnerabilities, investigative updates, overall threat assessments and case studies. The FBI's private sector partners, who own and operate some 85 percent of the nation's critical infrastructures, share expertise, strategies, and, most importantly, information and leads that help the FBI track down criminals and terrorists.

The IC3 is a joint initiative between the FBI and the National White Collar Crime Center. Located in West Virginia, a short distance from the NCFTA facility in Pittsburgh, the IC3 serves as a clearing house for cyber crime incidents reported by both individuals and business. The IC3 receives, on average, 25,000 reports of cyber crime incidents each month. By analyzing these complaints for commonalities and trends the IC3 is able to develop cases that have a national impact. These cases are then referred to local, state, or federal law enforcement agencies for investigation.

As with the NCFTA, the IC3 also focuses on partnerships with business as the most efficient and effective way to combat cyber crime. In 2002 the IC3 began an initiative to help online retailers combat fraud from re-shipping scams. The initiative known as REtailers and Law Enforcement Against Fraud (RELEAF) brought together teams of analysts at the IC3 and e-commerce businesses to identify fraudulent online purchase which were being shipped by domestic re-shippers to destinations overseas. In one 30-day period, the RELEAF initiative resulted in 17 arrests, 14 controlled deliveries, the recovery of \$340,000 in stolen merchandise, and the recovery of over \$115,000 in counterfeit cashier's checks.

An important issue in combating cyber crime is education and awareness. This is even more important for small businesses that may not have the personnel or financial resources to secure their online systems to the same level as larger businesses and organizations. The NCFTA and InfraGard initiatives all have a significant awareness/education component to their collaborative efforts with business.

In 2005 the FBI and United States Postal Inspection Service teamed up with several industry groups such as monster.com, Target, the Merchants Risk Council, and the Spamhaus Project, to create the LooksTooGood-ToBeTrue.com web site. This website contains information for the lay person regarding various types of cyber crimes and means of online protection. The LooksTooGoodToBeTrue.com web site received over 3.1 million hits during its first week of operation alone.

In closing, the FBI is committed to investigate threats at all levels on the Internet. Director Robert S. Mueller's vision in creating the Cyber Division, in fact, demonstrates this commitment. The aggressive and creative strategy the FBI has employed by partnering with business and academia will create an environment focused on information sharing that will allow us to develop actionable intelligence in order to better address the ever growing small-businesses cyber-security issues.

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## Chapter Officers and Board Members:

|                    |                                   |          |                                |
|--------------------|-----------------------------------|----------|--------------------------------|
| President          | Fred Pasteur, CFE                 | 741-5518 | fred.pasteur@state.tn.us       |
| Vice President     | Rene Brison, CFE, CPA             | 747-5353 | rene.brison@state.tn.us        |
| Past President     | Brent L. Rumbley, CFE, CPA, CISA  | 747-5298 | brent.rumbley@state.tn.us      |
| President Emeritus | Dennis Dycus, CPA, CFE            | 401-7871 | dennis.dycus@state.tn.us       |
| Treasurer          | Kerry Dye, CFE                    | 507-6534 | kerry.dye@state.tn.us          |
| Secretary          | Beth Pendergrass, CFE, CISA, CGFM | 747-5294 | beth.pendergrass@state.tn.us   |
| Training Director  | Hellens Kruszynski, CFE           | 401-7909 | hellens.kruszynski@state.tn.us |
| Member at Large    | Bob Cleland, CFE                  | 726-7969 | bcleland@lecg.com              |
| Member at Large    | Sharon Matheny, CGFM              | 744-4326 | sharon.matheny@state.tn.us     |
| Member at Large    | Don Johnson                       | 253-2164 | don.johnson@state.tn.us        |

## Committee Chairs

|                      |                                   |          |                                |
|----------------------|-----------------------------------|----------|--------------------------------|
| Website              | Lew Robbins, CPA                  | 747-5325 | lewis.robbs@state.tn.us        |
| Library              | Hellens Kruszynski, CFE           | 401-7909 | hellens.kruszynski@state.tn.us |
| Newsletter           | Beth Pendergrass, CFE, CISA, CGFM | 747-5294 | beth.pendergrass@state.tn.us   |
| Hospitality          | Doreen Zientar, CIA               | 882-7179 | dzientar@deloitte.com          |
| Scholarship/Outreach | Ron Hickman, CPA, CFE             | 532-7098 | rhickman@crowchizek.com        |
| Job Placement        | Herman Statum, CFE, CPA           | 377-4977 | hstatum@deloitte.com           |
| Historic             | Britt Wood, CFE, CPA              | 253-2018 | britt.wood@state.tn.us         |
| Nominating           | Bob McCloud, CFE                  | 747-5210 | bob.mccloud@state.tn.us        |

## Important Meeting Information

**Luncheons are \$8.00 for members who make their reservations by 9:30 a.m. on the Tuesday prior to the luncheon. For members making their reservations after that time on Tuesday, until Thursday morning, and for members who make a reservation but do not attend or call to cancel, the cost is \$12.00. Scarritt-Bennett Center charges us \$16.00 for meals when no reservation is made. Therefore, for individuals who attend without making a reservation, the cost is \$16.00. First-time guests eat free. After a guest's first visit, he or she will be charged \$12.00 for the lunch, provided he or she makes a reservation. Without a reservation, the lunch is \$16.00. Scarritt-Bennett provides excellent meals and plenty of free parking. For reservation contact Doreen Zientar at 882-7179 or by email at: dzientar@deloitte.com.**

## Luncheon Dates

**(Luncheon time: 11:30)**

September 28, 2006  
October 26, 2006  
November 2, 2006 (Joint with AGA)  
December 14, 2006 (Social)  
January 18, 2007  
February 22, 2007  
April 26, 2007  
May 24, 2007  
June Social (TBA)

## Directions to our Luncheon at the Scarritt-Bennett Center

From Downtown: Take West End Avenue south to 19th Ave. Turn left on 19th and drive to Division Street. Turn left on Division for about 100 feet, then turn back to the right on 19th Ave. Follow 19th Avenue to Grand Ave., turn left on Grand, turn right from Grand onto 18th Avenue. You will find two entrances to Scarritt-Bennett parking lots on the right just after you turn onto 18th Ave. We will be meeting in the Bennett Building in the Raintree Room on the 2nd floor. The Bennett Bldg. is about the same distance from either parking lot, toward the 19th Ave. side of the campus. Feel free to arrive early and get acquainted with the facility. If you are traveling from the south side of town, travel north on West End to 19th Ave. (You will pass the street that you used to turn on to go to the University Club.) Turn right on 19th Avenue and go to Division Street. Follow the rest of the directions from above. Visit [www.scarrittbennett.org](http://www.scarrittbennett.org) to see a map of their campus.

Middle Tennessee Chapter Email: [info@middletennesseecfe.org](mailto:info@middletennesseecfe.org)  
Association of Certified Website: [www.middletennesseecfe.org](http://www.middletennesseecfe.org)  
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Nashville, TN 37219

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