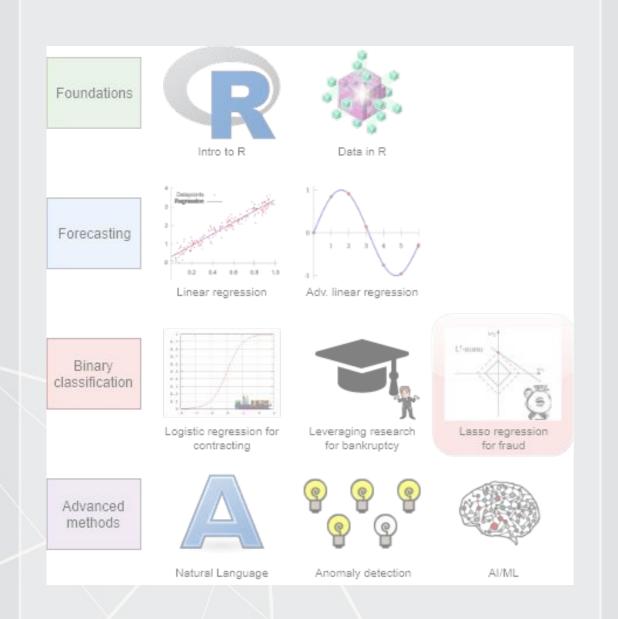
ACCT 420: Logistic Regression for Corporate Fraud

Session 7

Dr. Richard M. Crowley

Front matter

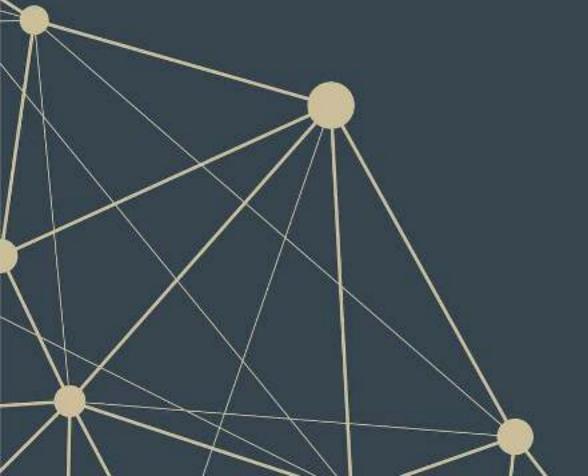
Learning objectives



- Theory:
 - Economics
 - Psychology
- Application:
 - Predicting fraud contained in annual reports
- Methodology:
 - Logistic regression
 - LASSO

Datacamp

- Explore on your own
 - No specific required class this week
- We will start having some assigned chapters after the break
 - I've post them already, so you can work on them at your leisure



Corporate/Securities Fraud

Traditional accounting fraud

- 1. A company is underperforming
- 2. Management cooks up some scheme to increase earnings
 - Worldcom (1999-2001)
 - Fake revenue entries
 - Capitalizing line costs (should be expensed)
 - Olympus (late 1980s-2011): Hide losses in a separate entity
 - "Tobashi scheme"
 - Wells Fargo (2011-2018?)
 - Fake/duplicate customers and transactions
- 3. Create accounting statements using the fake information



Reversing it

- 1. A company is overperforming
- 2. Management cooks up a scheme to "save up" excess performance for a rainy day
 - Dell (2002-2007)
 - Cookie jar reserve, from secret payments by Intel, made up to 76% of quarterly income
 - Brystol-Myers Squibb (2000-2001)
- 3. Recognize revenue/earnings when needed in the future to hit earnings targets



Other accounting fraud types

- Apple (2001)
 - Options backdating
- Commerce Group Corp (2003)
 - Using an auditor that isn't registered
- Cardiff International (2017)
 - Releasing financial statements that were not reviewed by an auditor
- China North East Petroleum Holdings Limited
 - Related party transactions (transferring funds to family members)
- Insufficient internal controls
 - Citigroup (2008-2014) via Banamex
 - Asia Pacific Breweries



Other accounting fraud types

- Suprema Specialties (1998-2001)
 - Round-tripping: Transactions to inflate revenue that have no substance
- Bribery
 - Keppel O&M (2001-2014): \$55M USD in bribes to Brazilian officials for contracts
 - Baker Hughes (2001, 2007): Payments to officials in Indonesia, and possibly to Brazil and India (2001) and to officials in Angola, Indonesia, Nigeria, Russia, and Uzbekistan (2007)
- ZZZZ Best (1982-1987): Fake the whole company, get funding from insurance fraud, theft, credit card fraud, and fake contracts
 - Also faked a real project to get a clean audit to take the company public

Other securities fraud types

- Bernard Madoff: Ponzi scheme
 - 1. Get money from individuals for "investments"
 - 2. Pretend as though the money was invested
 - Use new investors' money to pay back anyone withdrawing their money
- Imaging Diagnostic Systems (2013)
 - Material misstatements
 - Material omissions (FDA applications, didn't pay payroll taxes)
- Applied Wellness Corporation (2008)
 - Failed to file annual and quarterly reports
- Capitol Distributing LLC
 - Aiding another company's fraud (Take Two, by parking 2 video games)
- Tesla (2018)
 - Misleading statements on Twitter

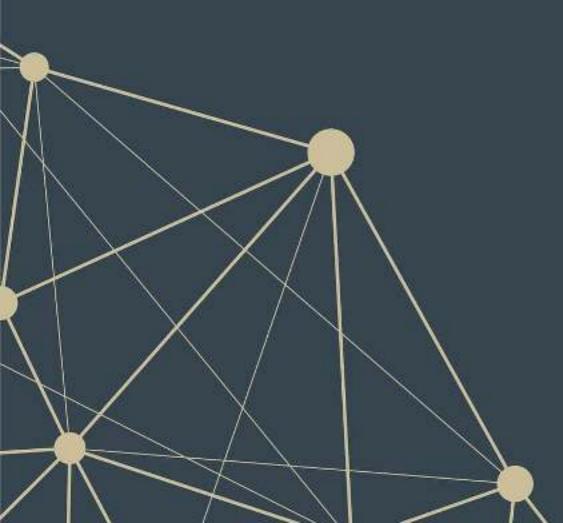
Some of the more interesting cases

AMD (1992-1993)

- Claimed it was developing processor microcode independently, when it actually provided Intel's microcode to it's engineers
- Am-Pac International (1997)
 - Sham sale-leaseback of a bar to a corporate officer
- CVS (2000)
 - Not using mark-to-market accounting to fair value stuffed animal inventories
- Countryland Wellness Resorts, Inc. (1997-2000)
 - Gold reserves were actually... dirt.
- Keppel Club (2014)
 - Employees created 1,280 fake memberships, sold them, and retained all profits (\$37.5M)

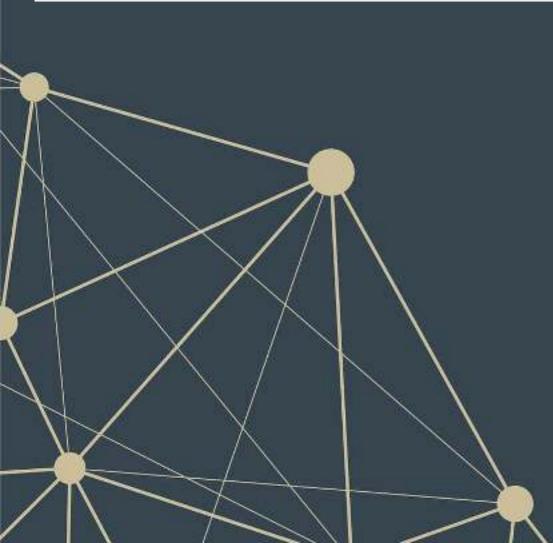
What will we look at today?

Misstatements that affect firms' accounting statements and were done seemingly intentionally by management or other employees at the firm.



How do misstatements come to light?

- 1. The company/management admits to it publicly
- 2. A government entity forces the company to disclose
 - In more egregious cases, government agencies may disclose the fraud publicly as well
- 3. Investors sue the firm, forcing disclosure



Where are these disclosed?

In the US:

- 1. 10-K/A filings (/A means amendment)
 - Note: not all 10-K/A filings are caused by fraud!
 - Any benign correction or adjustment can also be filed as a 10-K/A
 - Audit Analytic's write-up on this for 2017
- 2. In a note inside a 10-K filing
 - These are sometimes referred to as "little r" restatements
- 3. SEC AAERs: Accounting and Auditing Enforcement Releases
 - Generally highlight larger or more important cases
 - Written by the SEC, not the company

AAERs

Today we will examine these AAERs
 Using a proprietary data set of >1,000 such releases
 To get a sense of the data we're working with, read the *Summary* section (starting on page 2) of this AAER against Sanofi
 rmc.link/420class7

Why did the SEC release this AAER regarding Sanofi?

Predicting Fraud

Main question

How can we *detect* if a firm *is* involved in a major instance of missreporting?

This is a pure forensic analytics question
 "Major instance of misreporting" will be implemented using AAERs



Approaches

- In these slides, I'll walk through the primary detection methods since the 1990s, up to currently used methods
- 1990s: Financials and financial ratios
 - Follow up in 2011
- Late 2000s/early 2010s: Characteristics of firm's disclosures
- mid 2010s: More holistic text-based measures of disclosures
 - This will tie to next lesson where we will explore how to work with text

All of these are discussed in a Brown, Crowley and Elliott (2018) – I will refer to the paper as **BCE** for short

The data

- I have provided some preprocessed data, sanitized of AAER data (which is partially public, partially proprietary)
- It contains 399 variables
 - From Compustat, CRSP, and the SEC (which I personally collected)
 - Many precalculated measures including:
 - Firm characteristics, such as auditor type (bigNaudit, midNaudit)
 - Financial measures, such as total accruals (rsst_acc)
 - Financial ratios, such as ROA (ni_at)
 - Annual report characteristics, such as the mean sentence length (sentlen_u)
 - Machine learning based content analysis (everything with Topic_ prepended)

Pulled from BCE's working files

Training and Testing

Already has testing and training set up in variable Test
 Training is annual reports released in 2003 through 2007
 Testing is annual reports released in 2008

What potential issues are there with our usual training and testing strategy?



Censoring

- Censoring training data helps to emulate historical situations
 - Build an algorithm using only the data that was available at the time a decision would need to have been made
- Do not censor the testing data
 - Testing emulates where we want to make an optimal choice in real life
 - We want to find frauds regardless of how well hidden they are!



Event frequency

Very low event frequencies can make things tricky

```
df %>%
  group_by(year) %>%
  mutate(total_AAERS = sum(AAER), total_observations=n()) %>%
  slice(1) %>%
  ungroup() %>%
  select(year, total_AAERS, total_observations) %>%
  html_df
```

year	total_AAERS	total_observations
1999	46	2195
2000	50	2041
2001	43	2021
2002	50	2391
2003	57	2936
2004	49	2843

246 AAERs in the training data, 401 total variables...

Dealing with infrequent events

- A few ways to handle this
 - 1. Very careful model selection (keep it sufficiently simple)
 - Sophisticated degenerate variable identification criterion +
 simulation to implement complex models that are just barely
 simple enough
 - The main method in BCE
 - 3. Automated methodologies for pairing down models
 - We'll discuss using LASSO for this at the end of class
 - Also implemented in BCE



1990s approach

The 1990s model

Many financial measures and ratios can help to predict fraud

- EBIT
- Earnings / revenue
- ROA
- Log of liabilities
- liabilities / equity
- liabilities / assets
- quick ratio
- Working capital / assets
- Inventory / revenue
- inventory / assets
- earnings / PP&E
- A/R / revenue

- Change in revenue
- Change in A/R + 1
- hormode > 10% change in A/R
- Change in gross profit + 1
- > 10% change in gross
 profit
- Gross profit / assets
- Revenue minus gross profit
- Cash / assets
- Log of assets
- PP&E / assets
- Working capital

Approach

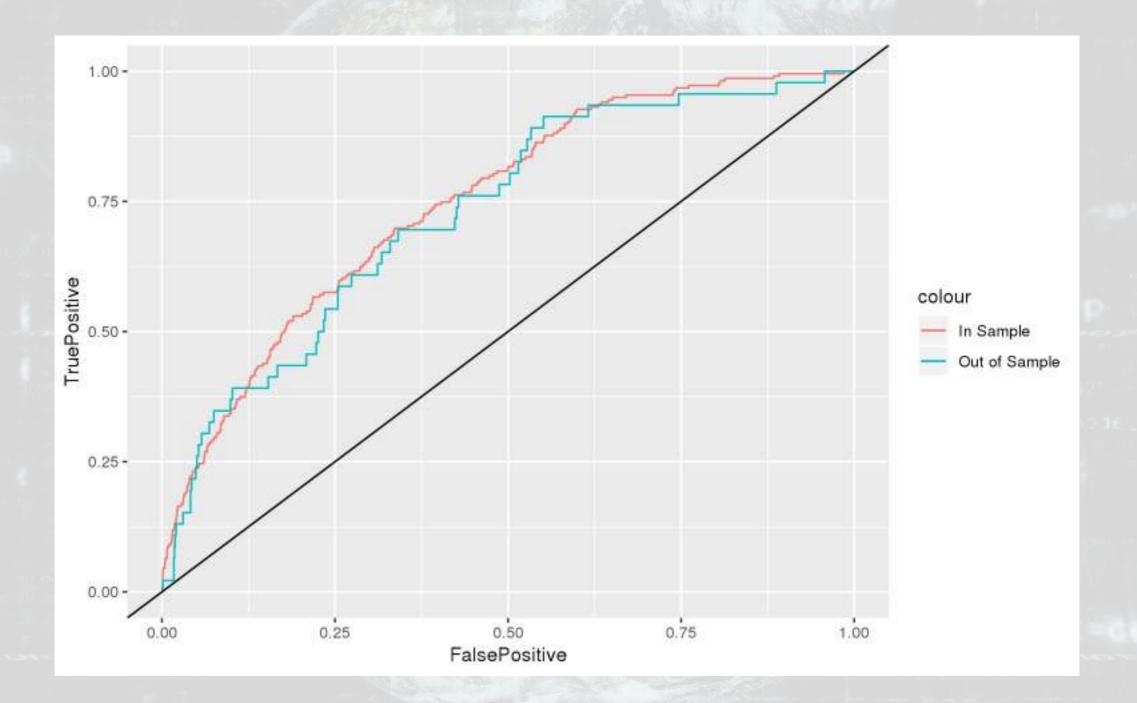
5.3

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##

```
## Call:
## glm(formula = AAER ~ ebit + ni revt + ni at + log lt + ltl at +
##
     It_seq + It_at + act_lct + aq_lct + wcap_at + invt_revt +
##
     invt at + ni ppent + rect revt + revt at + d revt + b rect +
     b rect + r gp + b gp + gp at + revt m gp + ch at + log at +
##
     ppent_at + wcap, family = binomial, data = df[df$Test ==
##
##
     0, ])
##
## Deviance Residuals:
             1Q Median
##
     Min
                             3Q
                                    Max
## -1.1391 -0.2275 -0.1661 -0.1190 3.6236
##
## Coefficients:
            Estimate Std. Error z value Pr(>|z|)
##
## (Intercept) -4.660e+00 8.336e-01 -5.591 2.26e-08
           -3.564e-04 1.094e-04 -3.257 0.00112 **
## ebit
             3.664e-02 3.058e-02 1.198 0.23084
## ni revt
            -3.196e-01 2.325e-01 -1.374 0.16932
## ni at
            1.494e-01 3.409e-01 0.438 0.66118
## log It
```

ROC



The 2011 follow up

The 2011 model

- Log of assets
- Total accruals
- % change in A/R
- % change in inventory
- % soft assets
- % change in sales from cash
- % change in ROA
- Indicator for stock/bond issuance
- Indicator for operating leases
- BV equity / MV equity

- Lag of stock return minus value weighted market return
- Below are BCE's additions
- Indicator for mergers
- Indicator for Big N auditor
- Indicator for medium size auditor
- Total financing raised
- Net amount of new capital raised
- Indicator for restructuring

Based on Dechow, Ge, Larson and Sloan (2011)

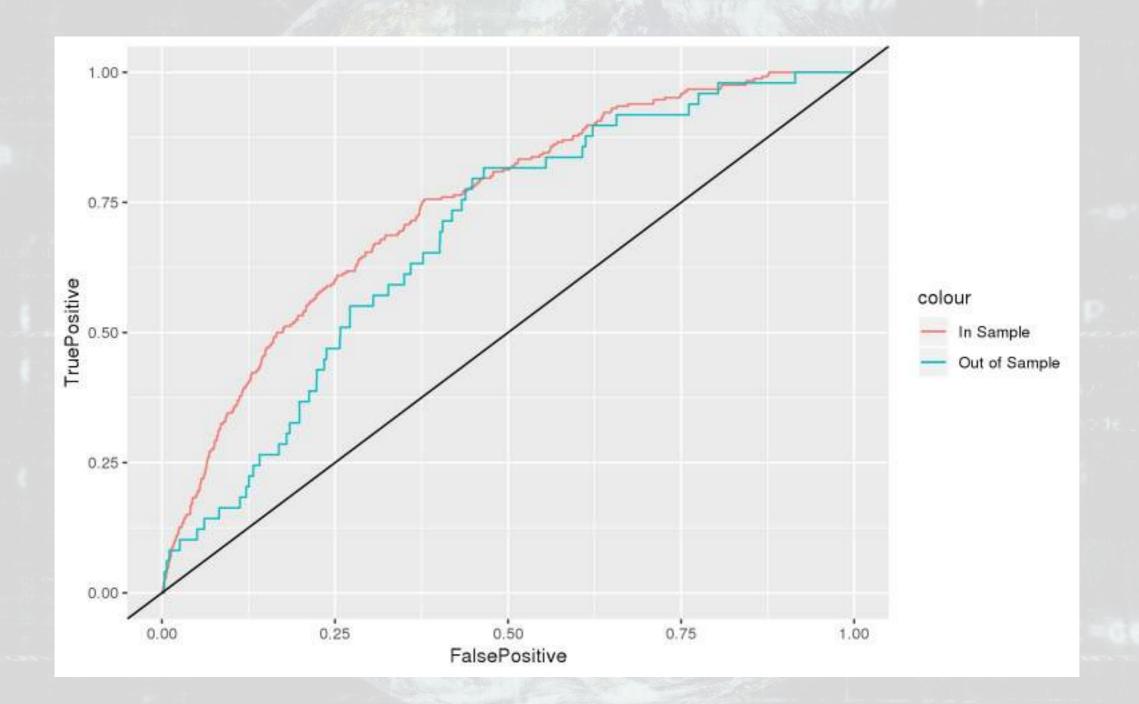
The model

##

```
## Call:
## glm(formula = AAER ~ logtotasset + rsst_acc + chg_recv + chg_inv +
     soft_assets + pct_chg_cashsales + chg_roa + issuance + oplease_dum +
##
     book mkt + lag sdvol + merger + bigNaudit + midNaudit + cffin +
##
     exfin + restruct, family = binomial, data = df[df$Test ==
##
##
     0, ])
##
## Deviance Residuals:
             1Q Median
                             3Q
##
     Min
                                   Max
## -0.8434 -0.2291 -0.1658 -0.1196 3.2614
##
## Coefficients:
               Estimate Std. Error z value Pr(>|z|)
##
                 -7.1474558 0.5337491 -13.391 < 2e-16 ***
## (Intercept)
                  0.3214322 0.0355467 9.043 < 2e-16 ***
## logtotasset
                 -0.2190095 0.3009287 -0.728 0.4667
## rsst acc
## chg recv
                  1.1020740 1.0590837 1.041 0.2981
                 0.0389504 1.2507142 0.031 0.9752
## chg_inv
## soft assets
                  2.3094551 0.3325731 6.944 3.81e-12 ***
```

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ROC



In sample AUC Out of sample AUC## 0.7445378 0.6849225

Late 2000s/early 2010s approach

The late 2000s/early 2010s model

- Log of # of bullet points + 1
- # of characters in file header
- # of excess newlines
- Amount of html tags
- Length of cleaned file, characters
- Mean sentence length, words
- S.D. of word length
- S.D. of paragraph length (sentences)

- Word choice variation
- Readability
 - Coleman Liau Index
 - Fog Index
- % active voice sentences
- % passive voice sentences
- # of all cap words
- # of !
- # of ?

From a variety of papers

Theory

- Generally pulled from the communications literature
 - Sometimes ad hoc
- The main idea:
 - Companies that are misreporting probably write their annual report differently



The late 2000s/early 2010s model

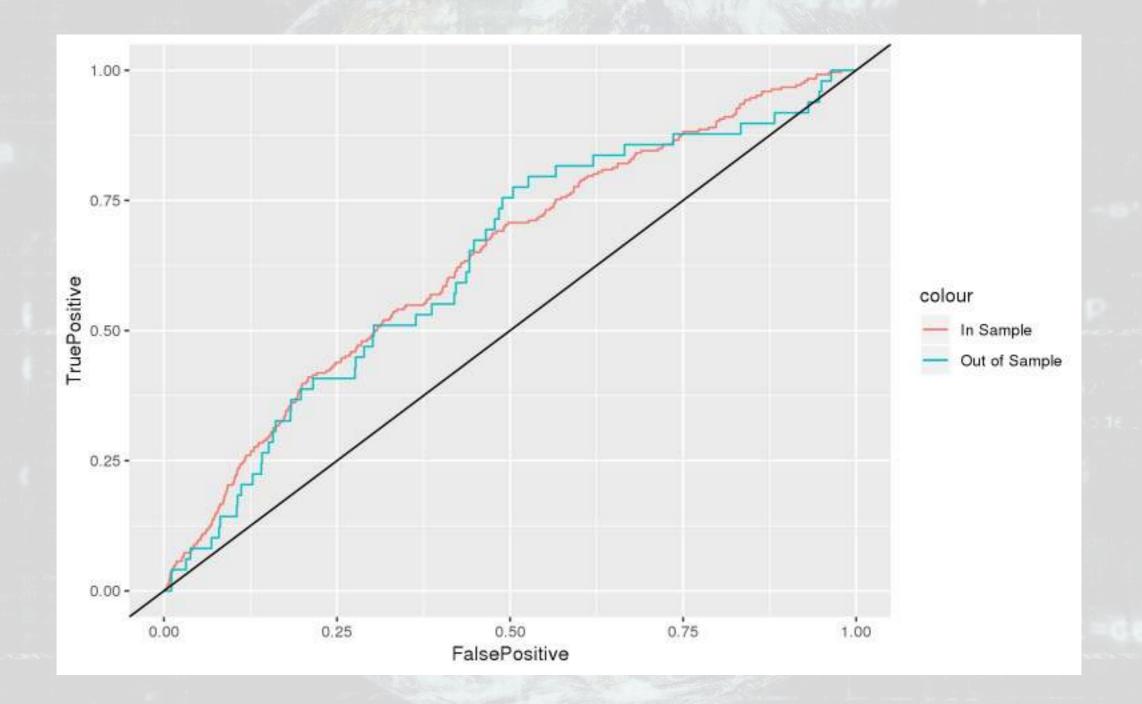
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```
fit_2000s <- glm(AAER ~ bullets + headerlen + newlines + alltags +
    processedsize + sentlen_u + wordlen_s + paralen_s +
    repetitious_p + sentlen_s + typetoken + clindex + fog +
    active_p + passive_p + lm_negative_p + lm_positive_p +
    allcaps + exclamationpoints + questionmarks,
    data=df[df$Test==0,],
    family=binomial)
summary(fit_2000s)</pre>
```

##

```
## Call:
## glm(formula = AAER ~ bullets + headerlen + newlines + alltags +
     processedsize + sentlen_u + wordlen_s + paralen_s + repetitious_p +
##
     sentlen s + typetoken + clindex + fog + active_p + passive_p +
##
     Im_negative_p + Im_positive_p + allcaps + exclamationpoints +
##
##
     questionmarks, family = binomial, data = df[dfTest == 0,
##
     1)
##
## Deviance Residuals:
##
             1Q Median
                             3Q
                                    Max
     Min
## -0.9604 -0.2244 -0.1984 -0.1749 3.2318
##
## Coefficients:
               Estimate Std. Error z value Pr(>|z|)
##
## (Intercept)
                 -5.662e+00 3.143e+00 -1.801 0.07165.
                -2.635e-05 2.625e-05 -1.004 0.31558
## bullets
## headerlen
                 -2.943e-04 3.477e-04 -0.846 0.39733
## newlines
                 -4.821e-05 1.220e-04 -0.395 0.69271
                 5.060e-08 2.567e-07 0.197 0.84376
## alltags
```

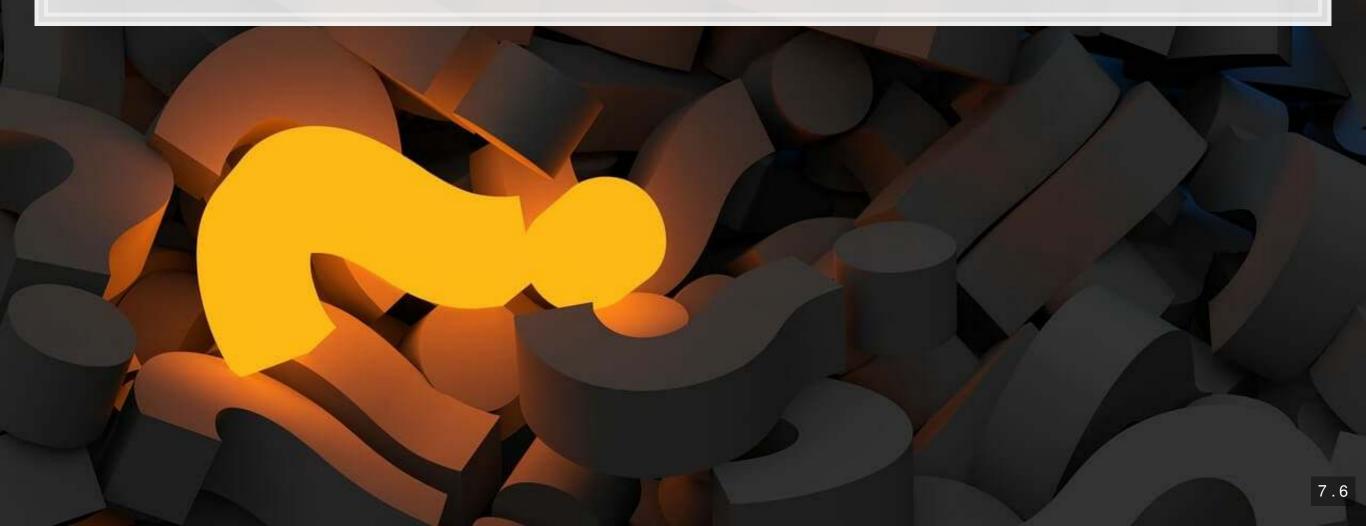
ROC



Combining the 2000s and 2011 models

Why is it appropriate to combine the 2011 model with the 2000s model?

2011 model: Parsimonious financial model
 2000s model: Textual characteristics



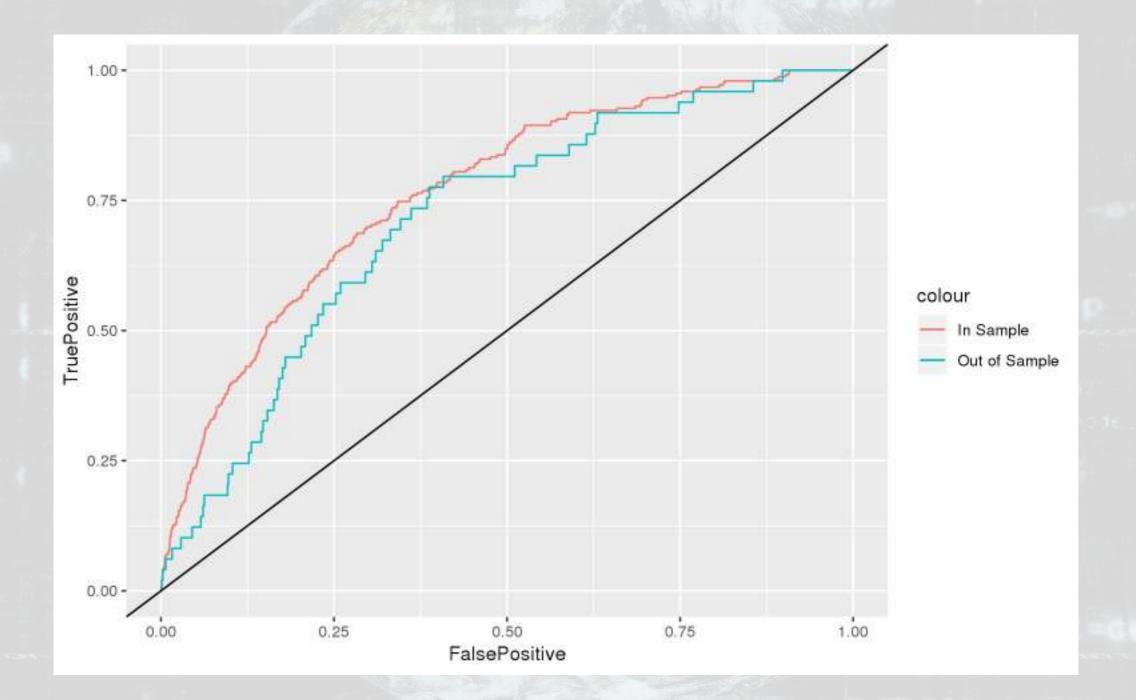
The model

##

Call:

```
## glm(formula = AAER ~ logtotasset + rsst_acc + chg_recv + chg_inv +
##
     soft_assets + pct_chg_cashsales + chg_roa + issuance + oplease_dum +
##
     book_mkt + lag_sdvol + merger + bigNaudit + midNaudit + cffin +
##
     exfin + restruct + bullets + headerlen + newlines + alltags +
##
     processedsize + sentlen_u + wordlen_s + paralen_s + repetitious_p +
##
     sentlen_s + typetoken + clindex + fog + active_p + passive_p +
     Im_negative_p + Im_positive_p + allcaps + exclamationpoints +
##
     questionmarks, family = binomial, data = df[df$Test == 0,
##
##
     1)
##
## Deviance Residuals:
##
             1Q Median
                             3Q
                                    Max
     Min
## -0.9514 -0.2237 -0.1596 -0.1110 3.3882
##
## Coefficients:
                Estimate Std. Error z value Pr(>|z|)
##
```

ROC



The BCE model

The BCE approach

Retain the variables from the other regressions
 Add in a machine-learning based measure quantifying how much documents talked about different topics common across all filings
 Learned on just the 1999-2003 filings

What the topics look like





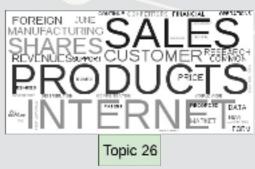














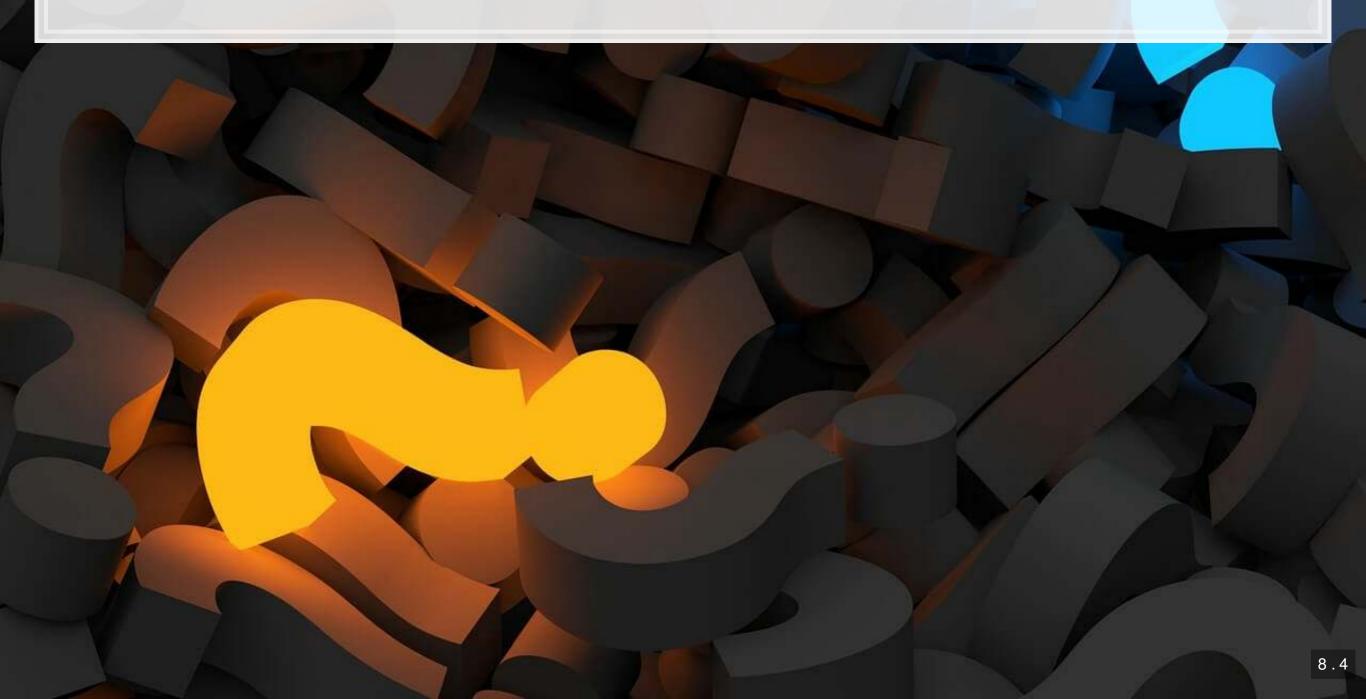


Topic 19



Theory behind the BCE model

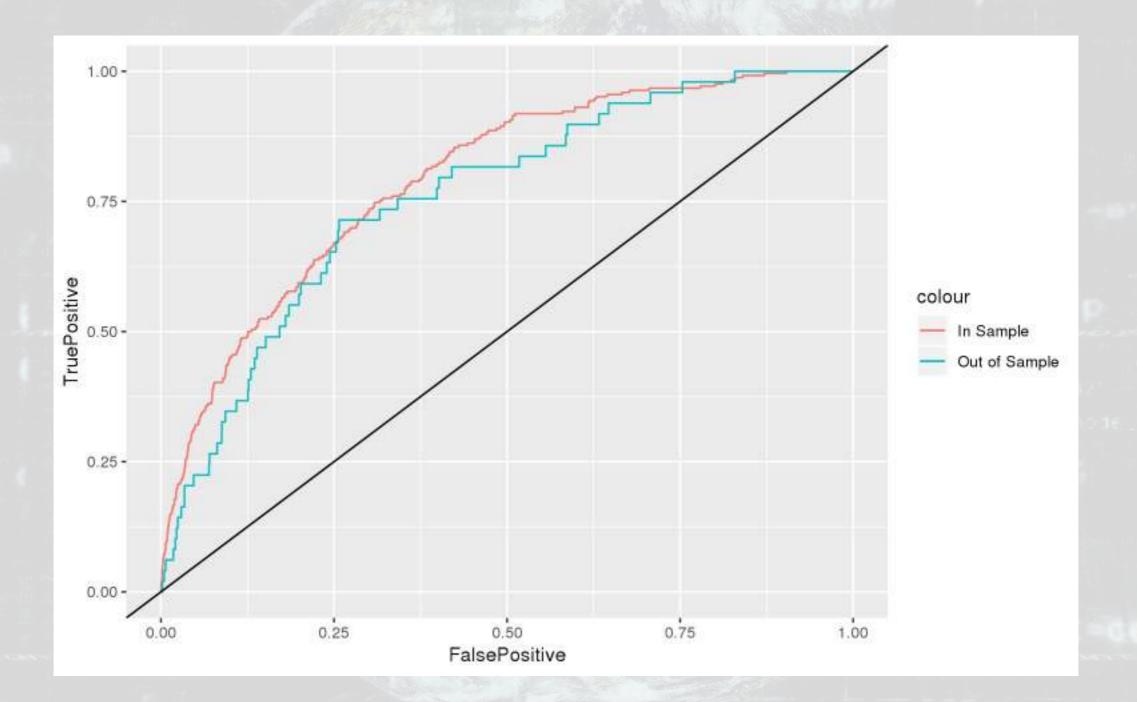
Why use document content?



The model

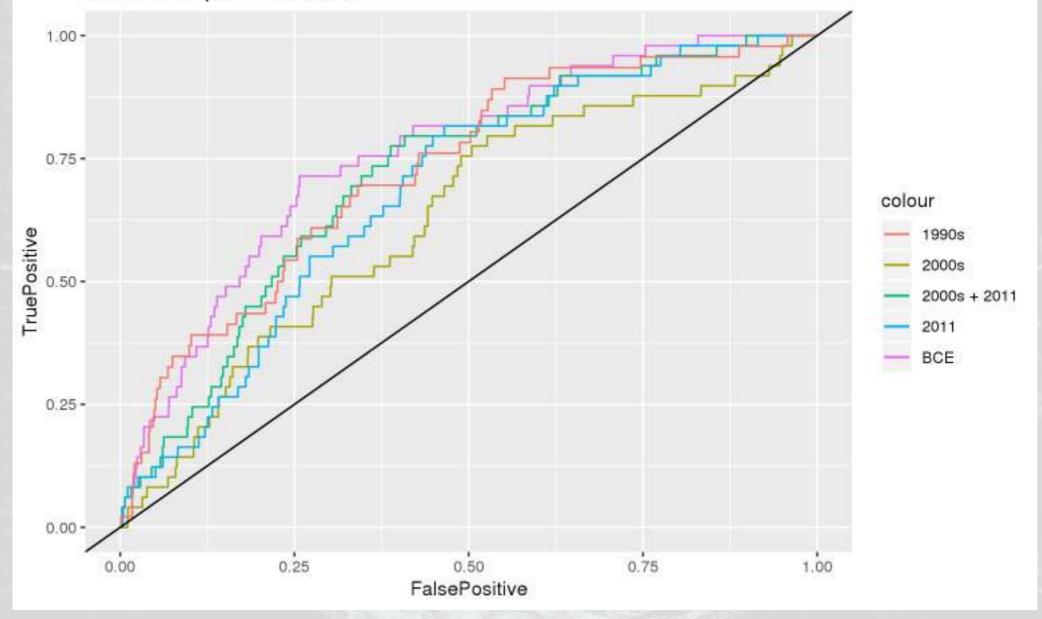
```
##
## Call:
## glm(formula = BCE_eq, family = binomial, data = df[df$Test ==
##
     0, ])
##
## Deviance Residuals:
             1Q Median
##
                             3Q
                                   Max
     Min
## -1.0887 -0.2212 -0.1478 -0.0940 3.5401
##
## Coefficients:
##
               Estimate Std. Error z value Pr(>|z|)
                 -8.032e+00 3.872e+00 -2.074 0.03806 *
## (Intercept)
                  3.879e-01 4.554e-02 8.519 < 2e-16 ***
## logtotasset
                 -1.938e-01 3.055e-01 -0.634 0.52593
## rsst acc
## chg_recv
                  8.581e-01 1.071e+00 0.801 0.42296
## chg inv
                 -2.607e-01 1.223e+00 -0.213 0.83119
```

ROC



Comparison across all models

Out of Sample ROC Curves



##	1990s	2011	2000s 2000s	+ 2011	BCE
##	0.7483132	0.7445378	0.6377783	0.7664115	0.7941841

Simplifying models with LASSO

What is LASSO?

Least Absolute Shrinkage and Selection Operator
 Least absolute: uses an error term like |ε|
 Shrinkage: it will make coefficients smaller
 Less sensitive → less overfitting issues
 Selection: it will completely remove some variables
 Less variables → less overfitting issues
 Sometimes called L¹ regularization
 L¹ means 1 dimensional distance, i.e., |ε|

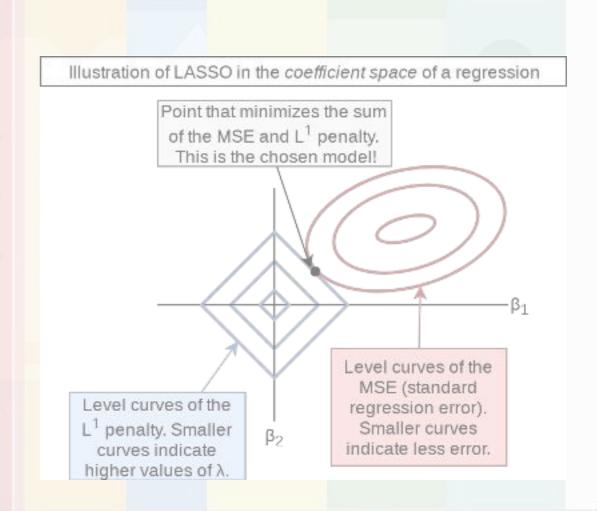
Great if you have way too many inputs in your model

This is how we can, in theory, put more variables in our model than data points

How does it work?

$$\min_{eta \in \mathbb{R}} \left\{ rac{1}{N} \left| arepsilon
ight|_2^2 + \lambda \left| eta
ight|_1
ight\}$$

- Add an additional penalty term that is increasing in the absolute value of each β
 Incentivizes lower βs, shrinking them
- The selection is part is explainable geometrically



Package for LASSO

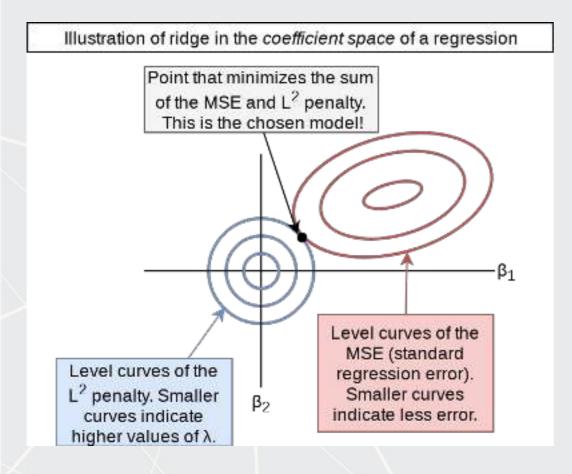
glmnet

- For all regression commands, they expect a y vector and an x matrix instead of our usual y ~ x formula
 - R has a helper function to convert a formula to a matrix: model.matrix()
 - Supply it the right hand side of the equation, starting with ~, and your data
 - It outputs the matrix x
 - Alternatively, use as.matrix() on a data frame of your input variables
- 2. It's family argument should be specified in quotes, i.e., "binomial" instead of binomial

What else can the package do?

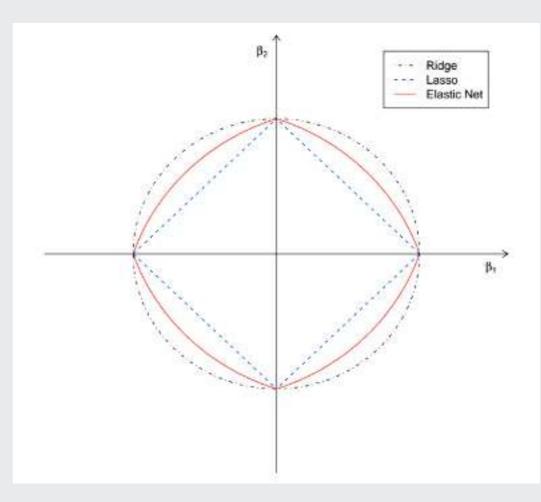
Ridge regression

Similar to LASSO, but with an L² penalty (Euclidean norm)



Elastic net regression

Hybrid of LASSO and Ridge
Below image by Jared Lander



How to run a LASSO

To run a simple LASSO model, use glmnet()
Let's LASSO the BCE model

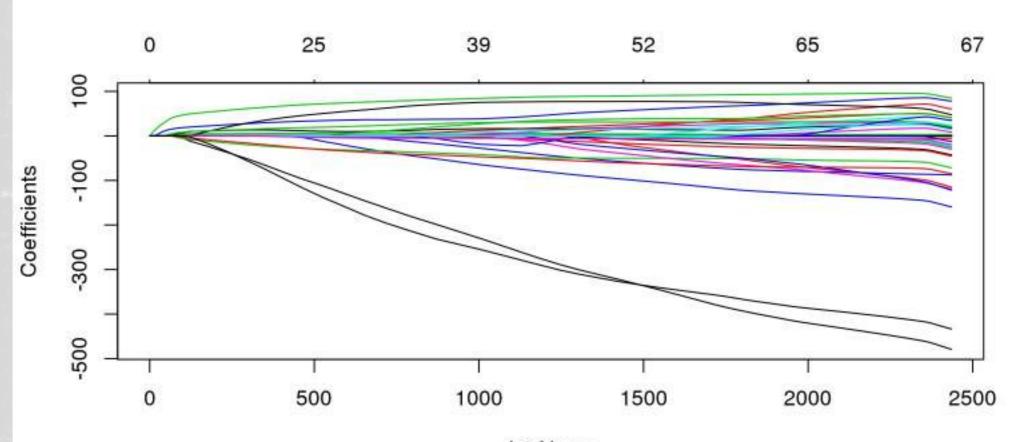
library(glmnet)

Note: the model selection can be more elegantly done using the useful package, see here for an example



Visualizing Lasso

plot(fit_LASSO)



L1 Norm

the state

What's under the hood?

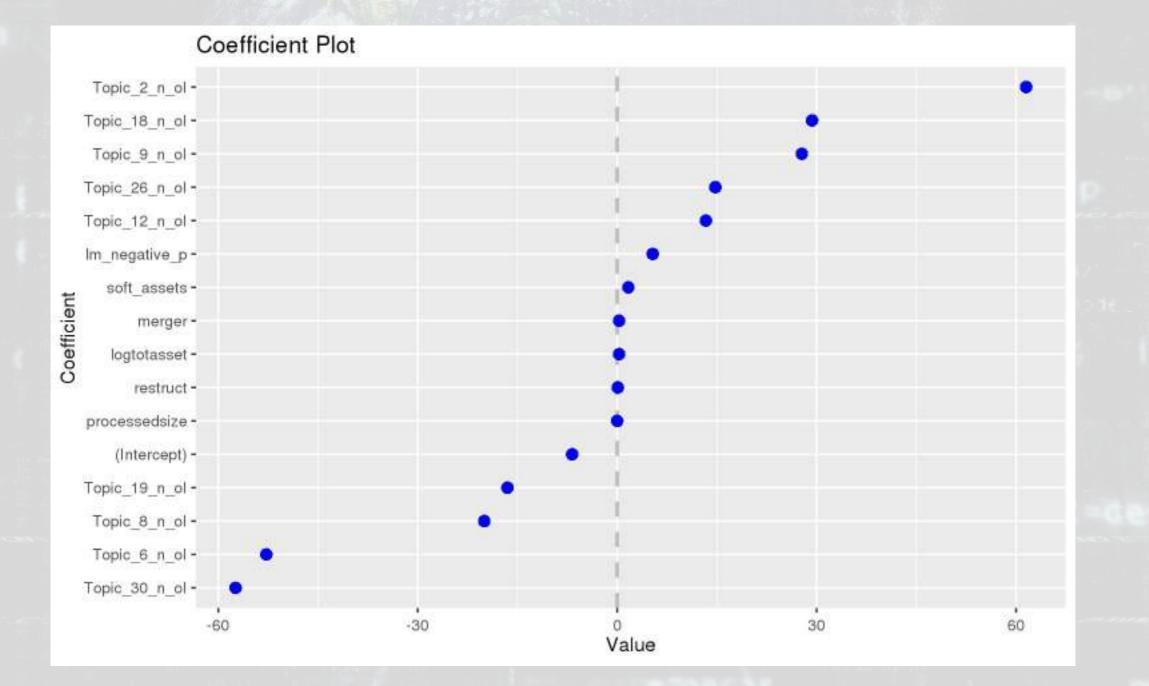
print(fit_LASSO)

Call: g|mnet(x = x, y = y, family = "binomial", alpha = 1)## ## Df %Dev Lambda ## [1,] 0 1.312e-13 1.433e-02 ## [2,] 1 8.060e-03 1.305e-02 ## [3,] 1 1.461e-02 1.189e-02 ## [4,] 1 1.995e-02 1.084e-02 ## [5,] 2 2.471e-02 9.874e-03 ## [6,] 23.219e-028.997e-03 ## [7,] 2 3.845e-02 8.197e-03 ## [8,] 2 4.371e-02 7.469e-03 ## [9,] 2 4.813e-02 6.806e-03 ## [10,] 3 5.224e-02 6.201e-03 ## [11,] 3 5.591e-02 5.650e-03 ## [12,] 4 5.906e-02 5.148e-03 ## [13,] 4 6.249e-02 4.691e-03 ## [14,] 5 6.573e-02 4.274e-03 ## [15,] 7 6.894e-02 3.894e-03 ## [16,] 8 7.224e-02 3.548e-03

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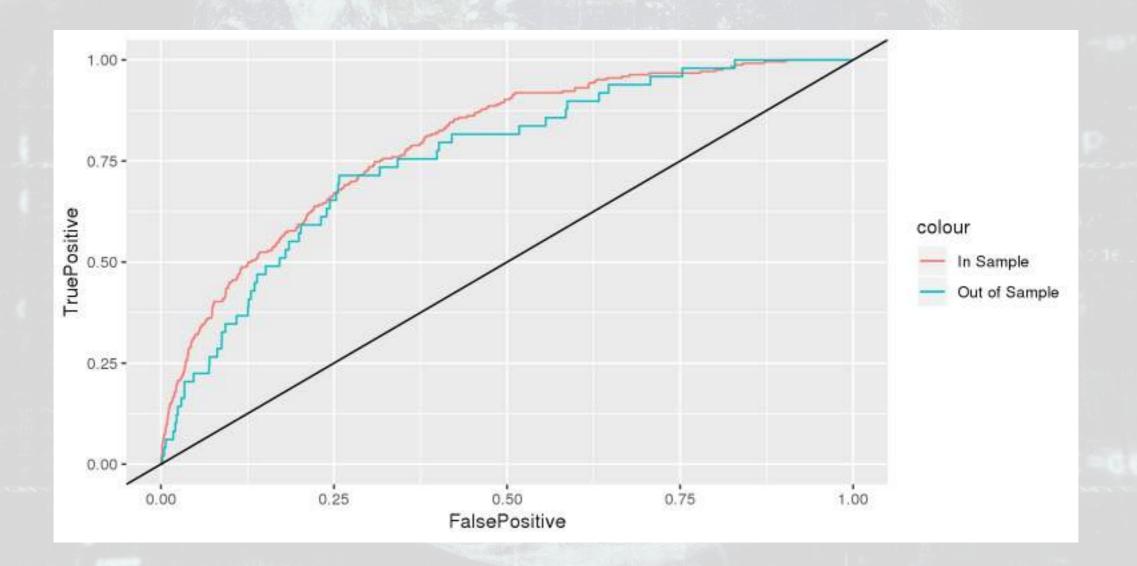
One of the 100 models

#coef(fit_LASSO, s=0.002031)
coefplot(fit_LASSO, lambda=0.002031, sort='magnitude')



How does this perform?

na.pass has model.matrix retain NA values (so the # of rows is constant)
xp <- model.matrix(BCE_eq, data=df, na.action='na.pass')[,-1]
s= specifies the version of the model to use
pred <- predict(fit_LASSO, xp, type="response", s = 0.002031)</pre>



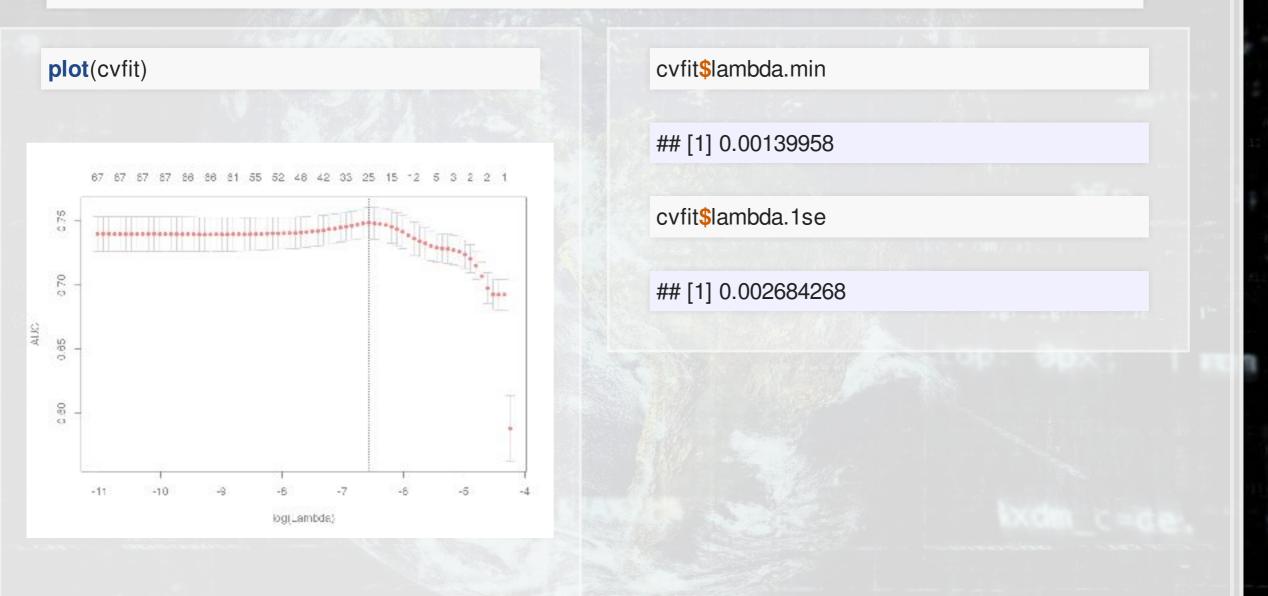
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Automating model selection

- LASSO seems nice, but picking between the 100 models is tough!
- It also contains a method of *k-fold cross validation* (default, k = 10)
 - 1. Randomly splits the data into k groups
 - 2. Runs the algorithm on 90% of the data (k 1 groups)
 - 3. Determines the best model
 - 4. Repeat steps 2 and 3 k 1 more times
 - 5. Uses the best overall model across all k hold out samples
- It gives 2 model options:
 - "lambda.min": The best performing model
 - "lambda.1se": The simplest model within 1 standard error of "lambda.min"
 - This is the better choice if you are concerned about overfitting

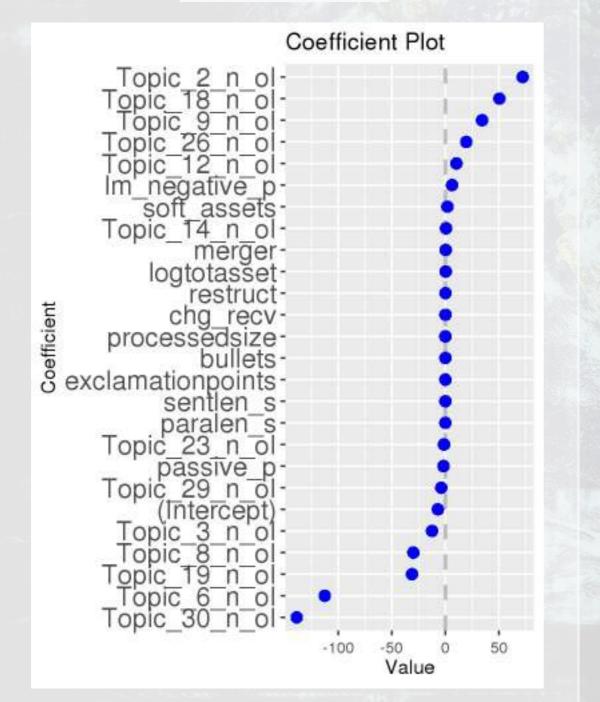
Running a cross validated model

Cross validation
set.seed(697435) #for reproducibility
cvfit = cv.glmnet(x=x, y=y,family = "binomial", alpha = 1, type.measure="auc")

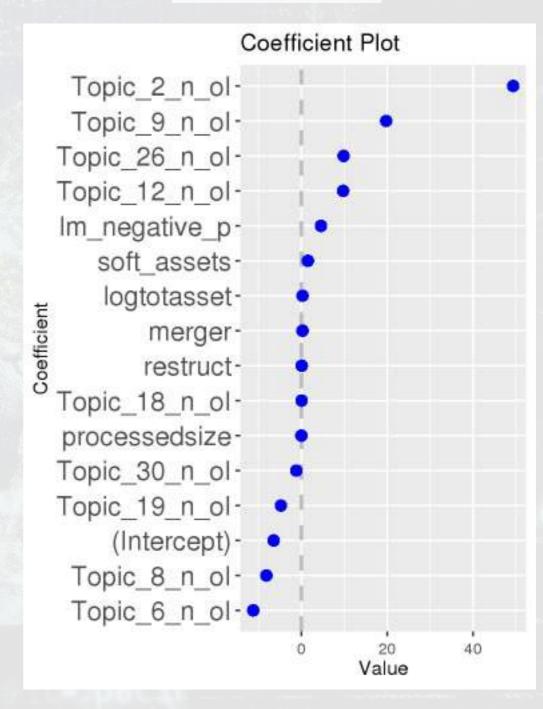


Models

lambda.min

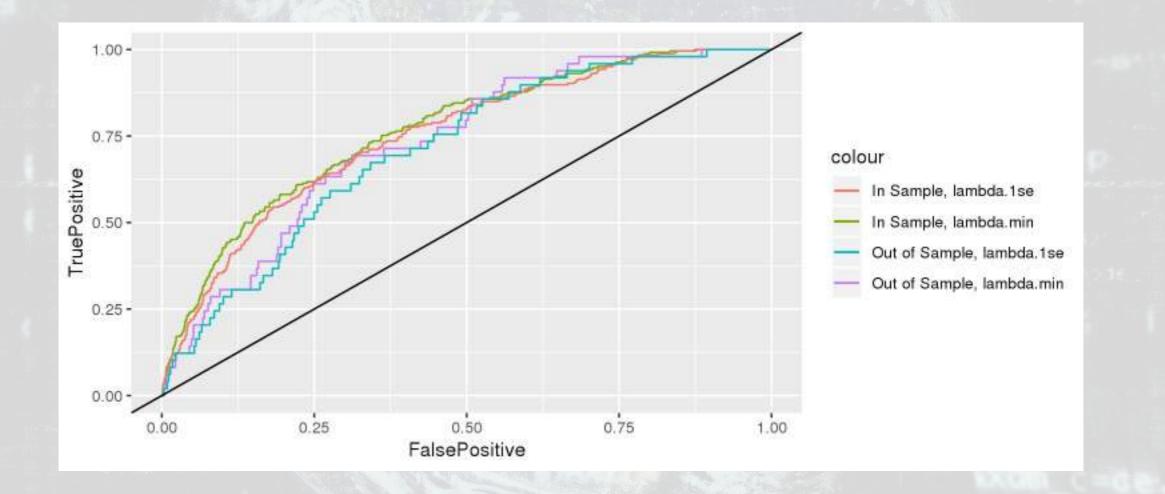


lambda.1se



CV LASSO performance

s= specifies the version of the model to use
pred <- predict(cvfit, xp, type="response", s = "lambda.min")
pred2 <- predict(cvfit, xp, type="response", s = "lambda.1se")</pre>



In sample AUC, lambda.min Out of sample AUC, lambda.min
0.7665463 0.7330212
In sample AUC, lambda.1se Out of sample AUC, lambda.1se
0.7509946 0.7124231

Drawbacks of LASSO

- 1. No p-values on coefficients
 - Simple solution run the resulting model with glm()
 - Solution only if using family="gaussian":
 - Run the lasso use the lars package
 - m <- lars(x=x, y=y, type="lasso")</p>
 - Then test coefficients using the covTest package
 covTest(m, x, y)
- 2. Generally worse in sample performance
- 3. Sometimes worse out of sample performance (short run)
 - BUT: predictions will be more stable



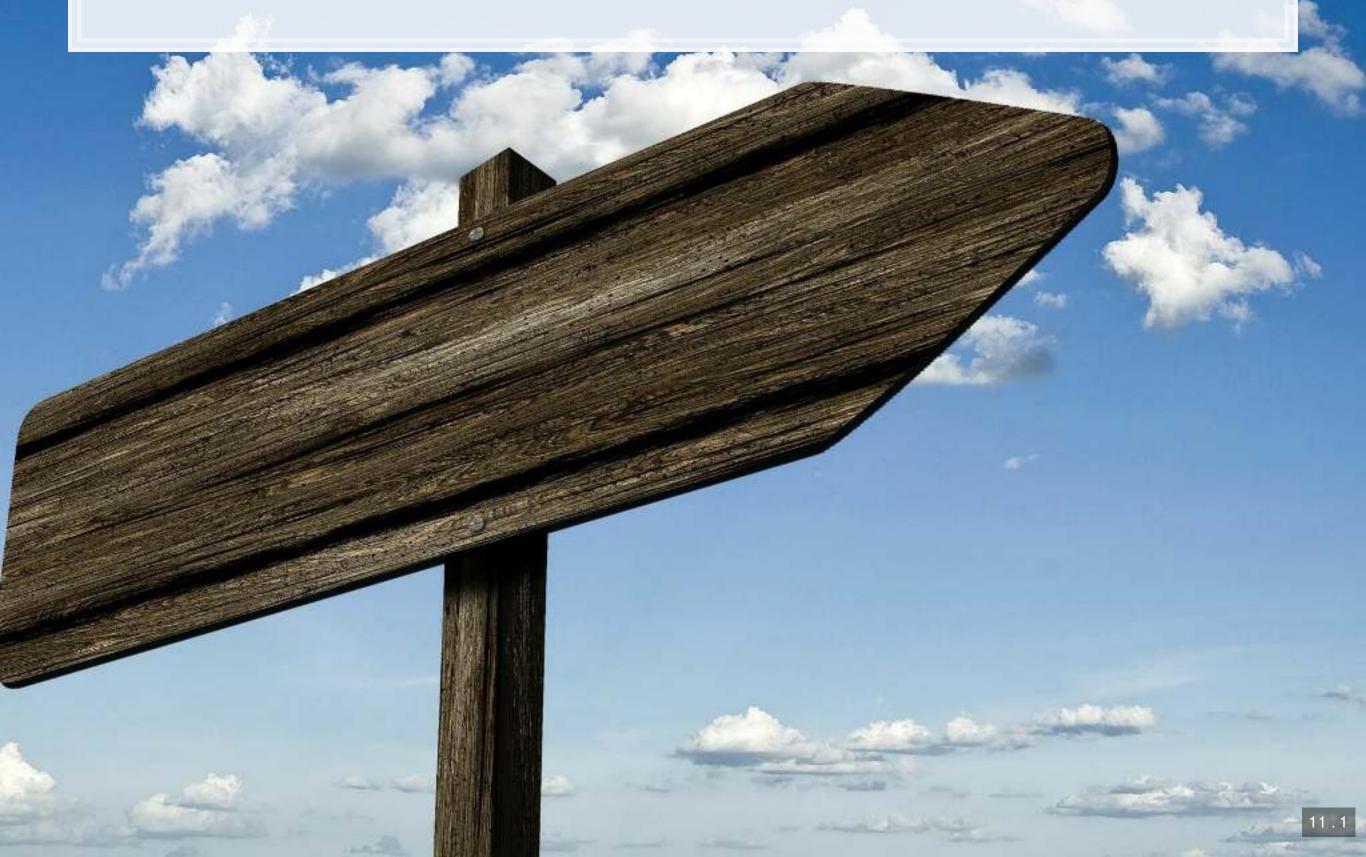
Wrap up

Predicting fraud

What other data could we use to predict corporate fraud?

- What is the reason that this event or data would be useful for prediction?
 - I.e., how does it fit into your mental model?
- What if we were...
 - Auditors?
 - Internal auditors?
 - Regulators?
 - Investors?

End matter



For next week

- Next week:
 - Break week 😂
- For two weeks from now:
 - Third individual assignment
 - On binary prediction
 - Finish by the end of Thursday
 - Can be done in pairs
 - Submit on eLearn
 - Datacamp
 - Practice a bit more to keep up to date
 - Using R more will make it more natural



Packages used for these slides

- coefplot
- glmnet
- kableExtra
- knitr
- magrittr
- revealjs
- ROCR
- tidyverse

