V²: Using Violation and Vulnerability Analysis to Understand the Root-Causes of Complex Security Incidents

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Abstract: The US Department for Homeland Security has commissioned a number of recent reports into the 'root causes' of adverse events ranging from denial of critical infrastructure to barriers for security information transfer between Federal agencies. The US Department of Energy has also established the Information Security Resource Center to coordinate the 'root cause analysis' of security incidents. Harvard Business School (Austin and Darby 2003) highlighted several commercial initiatives to understand not simply what went wrong in any single previous incident but also to identify any further underlying vulnerability. All of these initiatives go beyond the specific events of a particular security incident to identify the underlying 'systemic' technical, managerial and organizational precursors. Unfortunately, there are relatively few established tools and techniques to support the 'root cause' analysis of such incidents. This paper, therefore, provides an introduction to V² (Violation and Vulnerability) diagrams. These are then used to provide a sustained analysis of Rusnak's fraudulent transactions involving the Allfirst bank. This case study is appropriate because it included failures in the underlying audit and control mechanisms. It also stemmed from individual violations, including the generation of bogus options.

Keywords: Root-cause analysis; Security violations; Accident analysis.

Introduction

A number of organizations already recognize the importance of this 'lessons learned' approach to security incidents. For example, the Los Alamos National Laboratory adopted this approach in the aftermath of a series of security related incidents involving information about nuclear weapons research. The mishandling' of two computer hard drives containing classified information led the director of the laboratory to report to the Senate Armed Services Committee. This report focused on the individual human failures that were identified as root causes. However, it also consider the contributing factors that included the 'government-wide de-emphasis on formal accounting of classified material that began in the early 1990s, which weakened security practices and created an atmosphere that led to less rigor and formality in handling classified material' (Roark, 2000). These and similar findings have led the US government to focus more directly on the different factors that contribute to the underlying causes of security vulnerabilities. The Government Security Reform Act (2001) transferred the Federal Computer Incident Response Capability (FedCIRC) from the National Institute for Standards and Technology (NIST) to the General Services Administration (GSA). As part of this move, the GSA was charged to identify patterns in the causes of security incidents (Lew, 2001).

Similar trends can be observed in commercial organizations, especially business consultancies. For instance, Price Waterhouse Cooper (Skalak, 2003) recently issued a brief on understanding the root causes of financial fraud. They argued that 'the key for companies is to use a global risk paradigm that considers the root causes of financial fraud, corporate improprieties and potential regulatory malfeasance arising from different markets, and therefore different risk environments, in which global enterprises operate'. Although their focus is on the wider aspects of fraud and not simply of security, the Investigations and Forensic Services group within PWC have argued that a wider form of 'root cause' analysis represents a new paradigm for the investigation of security incidents. The intention is to probe beyond the specific violations of external agencies and junior staff members to look at the wider organizational problems that

created the context and opportunities for these threats to be realized. Several accountancy firms in the US and Europe have adopted a similar perspective as they begin to examine the consequences of recent corporate scandals (Rabinowitz, 1996). It is clearly important that we learn as much as possible from those incidents that do take place if we are to reduce the likelihood and mitigate the consequences of security violations. Kilcrece et al's (2003) work on organizational structures ighlights the consequences of the lack of methodological support for investigatory agencies. They argue "different members of the security team may conduct very different types of analysis, since there is no standard methodology".

The Allfirst Case Study

In 1983, the Allied Irish Bank (AIB) acquired a stake in Allfirst, then known as the First Maryland Bancorp. This stake grew until by 1989, AIB had taken acquired First Maryland through a merger. AIB planned to diversify its operations in North America (Promontory, 2002). They believed that this could best be achieved by allowing Allfirst a large amount of local autonomy. Allfirst continued have its own management team and board of directors. However, stronger control was retained over Treasury operations via the appointment of a senior AIB executive to oversee these operations. Prior to his appointment in 1989, there had only been a minimal history of currency trading at Allfirst with limited risks and a limited budget. In 1990, however, a trader was recruited to run proprietary trading. These operations continued relatively successfully until the first incumbent of this post had to be replaced in 1993. John Rusnak was recruited from a rival bank in New York, where he had traded currency options since 1989. One aspect of his recruitment was the desire by Allfirst to exploit a form of arbitrage that Rusnak specialized in. This took advantage of the differences in price between currency options and currency forwards. In simple terms, an option is an agreement that gives the buyer the right but not the obligation to buy or sell a currency at a specified price on or before a specific future date. If it is exercised, the seller must deliver the currency at the specified price. A forward is a contract to provide foreign exchange with a maturity of over 2 business days from the transaction date. Allfirst's treasury operations were divided into three areas. Rusnak's currency trading was part of the front office. The middle office was responsible for liability and risk management. The back-office was responsible for confirming, settling and accounting for foreign exchange and interest rate derivatives trades, including those initiated by Rusnak. Allfirst espoused the policy of having the back-office confirm all trades, following industry practice. The initial reports speculate that Rusnak may have put pressure on his colleagues not to confirm all of his options trades. Rusnak formed part of a relatively small and specialized group in the Foreign Exchange area. The Allfirst Tresurer was responsible both for ensuring profitable trading and for ensuring effective controls on that trading. Subsequent investigations also revealed concerns about the Treasury Funds Manager's position. Not only did they direct many of the Treasury operations but they also controlled many of the reporting procedures that were used to monitor operational risks. The Vice President for Risk Control, therefore, devised a plan so that asset and liability management reports as well as risk control summaries would be directed to senior management through his office. Unfortunately, this plan does not seem to have been implemented before the fraud was detected.

Violations and Vulnerability Analysis (V² Analysis)

Many different event-based techniques have been developed to support the root cause analysis of safetyrelated incidents. These include Events and Causal Factors charting (ECF), Multilinear Events Sequencing (MES) and Sequential Timed Event Plotting (STEP). Brevity prevents a detailed analysis of each of these approaches; the interested reader is directed to Johnson (2003). These techniques provide little specific support for the analysis of security incidents. Hence, the basic components in these event-based techniques are unchanged from their use in safety-related applications even though the details surrounding these 'dependability' failures can be very different. In contrast, Figure 1 provides an example of Violation and Vulnerability (V^2) analysis. This extends an event based modelling technique to deliberately support the identification of root causes for a wide range of security related incidents. The underlying approach is similar to the existing ECF, MES and STEP techniques, mentioned above. This V^2 diagram is constructed around a number of events that are denoted by rectangles. For example, 'AIB insert senior manager as Allfirst treasurer' and 'Treasurer is appointed to key AIB group marketing strategy committee' are both shown as events in Figure 1. These are made more likely by a number of contributory factors that are shown by ellipses. For instance, the decision to insert one of the AIB executives as the Allfirst Treasurer led to a situation in which some viewed the treasurer as a form of 'home office spy'. This contributed to the exclusion of the formed AIB executive from some senior management decisions at Allfirst. Figure 1 maps out a range of conditions that formed the background to the more detailed events mentioned in previous sections. An important objective behind the use of this modeling technique is to trace the roots of a security violation back into the underlying vulnerabilities within the operations of a company, such as Vulnerabilities can be thought of as a particular type of contributory factor. They create the Allfirst. opportunity for the violations that occur during security incidents. In Figure 1, vulnerabilities relate to the dual reporting structure between AIB and Allfirst. They weakened the supervision of the Treasurer's activities in the lead-up to the fraud. This vulnerability is denoted by the double ellipse at the bottom right of figure 1. Subsequent V^2 diagrams can be used to map out the precise manner in which this particular contributory factor acted as a precondition for Rusnak's violations. Figure 1 illustrates the way in which V^2 diagrams can be used to look beyond the particular violations that lead to a fraud. This is important if investigations are to accurately identify the underlying managerial and organizational factors that might lead to future security problems. For instance, one response to the events at Allfirst would simply have been to focus legal retribution on the trader. This would, however, have ignored underlying problems in the relationship between AIB and Allfirst, including the supervision of key Treasury staff. This point is made more forcefully in the recommendations that emerged in the immediate aftermath of the fraud; 'In light of the foregoing considerations, AIB should consider terminating all proprietary trading activities at Allfirst, and all customer trading activities at Allfirst should be relocated to the AIB branch in New York. While the salespeople may continue to be located in Baltimore, any price-making and trade execution should be done in New York, under the direct supervision of AIB treasury' (Promontory, 2002).

Figure 2 continues the Violations and Vulnerability analysis by documenting the events leading to the hiring of Rusnak by Allfirst. Prior to 1989, Allfirst had only engaged in limited currency trading. This contributed to the decision to recruit a specialist to run their proprietary trading business. During this period, trading was focused on directional trading, in other words profits were dependent on forecasting the future price of a currency as it moved up or down on the markets. The senior trader left Allfirst and a further event in Figure 2 is used to show that the 'Treasury funds manager heads the search for a new trader'. This leads to an offer being made to Rusnak. The decision to make this offer was supported by recommendations from his previous employers at Chemical Bank. His appointment was also supported by the Allfirst Senior Management's interest in Rusnak's non-directional trading. This will be described in more detail in subsequent V^2 diagrams. Figure 2 also illustrates how these various events, together with a number of additional contributory factors lead to a further security vulnerability. Allfirst's efficiency committee suggested that the treasurer scale-back proprietary currency trading. However, the senior management interest in Rusnak's non-directional approach helped to focus the cutbacks in more conventional forms of currency trading. The senior management interest also created a situation in which the Treasury funds manager was highly protective of Rusnak and his activities. These various factors combined to weaken the monitoring and reporting procedures that were established to control the risks associated with his activities. When Rusnak's immediate trading manager resigned, his post was not filled. Lack of funds prevented a renewed appointment and so Rusnak now reported directly to the treasury funds manager who, as we have already seen, was protective of his non-directional trading strategies.

Rusnak initially created the impression that he specialized in a form of arbitrage by taking a profit from differences in the exchange rates between different markets. In particular, he claimed to make profits by holding a large number of options that were hedged by balancing positions in the cash market. These observations are denoted in Figure 3 by the contributory factors at the top-right of the diagram. The contributory factors at the top-left show that most of his trades were simpler than many at Allfirst had supposed. They involved linear trades based simply on predicted fluctuations in currency rates. This led him to buy significant quantities of Yen for future delivery. The subsequent decline in value of this trading activities, the loss may have created a situation in which he felt under pressure to hide the outcomes from his options on the Yen. This analysis of the top components in Figure 3 raises a number of important issues about the construction of V^2 diagrams. It can be argued that Rusnak's creation of a false impression about the nature of his trades should be 'promoted' from a contributory factor to either a violation, and therefore be linked to specific events, or vulnerability.

and his actual methods helps to explain many of his subsequent actions. It can equally well be argued that such tensions are widespread within many financial organizations. Several studies have pointed to the psychological characteristics and personality attributes of successful traders (Tvede, 1999). It has been argued, for instance in Oberlecher's (2004) study of the psychology of foreign exchange markets, that the same attributes that create these tensions between action and appearance may also be important ingredients in the makeup of successful traders. The meta-level point here is that V² analysis forces investigators to consider whether or not each contributory factor could be considered a potential vulnerability and also whether each event in the context of a security incident might also be labeled a violation. There is no automatic or algorithmic process to support this analysis.

Figure 3 also illustrates the mechanisms that Rusnak used to hide his losses from directional trading on the Yen. These have been briefly outlined in previous sections. Initially, he began by creating a bogus 'deep in the money' option. Recall that such an option has a price that is significantly below the current spot-price and hence it is high risk for the vendor. Such options attract high premiums, especially if they can be exercised in the short term when the spot price is unlikely to fall below the level of the quoted option. Allfirst, therefore, had a significant potential liability. At the same time, he created a second balancing bogus option with the same counterparty. This is represented in Figure 3 by the violation labeled 'Rusnak creates balancing option as if Allfirst have paid a large premium to buy currency weeks later involving the same counterparty'. This made it look like Allfirst's original liability was offset by the asset value of the second option. Allfirst should have paid a correspondingly large premium to obtain this second option even though no cash would actually have changed hands because the two premiums balanced each other and were drawn against the same parties. The crucial difference between these options was that the first one, representing Allfirst's liability, was set up to expire within 24 hours. The second. representing Allfirst's fictitious asset, expired several weeks later. Rusnak knew that neither option would ever be exercised because they were bogus deals. However, for the period between the expiry on the first option and the end of the second, he was able to create the appearance of a genuine asset on the Allfirst books. This could be used to offset his genuine losses.

These deals made no sense for a number of reasons. Firstly, the risk exposure on each of the options was quite different given that one expired in 24 hours while the second typically lasted for several weeks. In such circumstances, the options should have attracted very different premiums and so were unlikely to balance each other out. Secondly, the 'deep in the money' options involved in the first bogus trade should have been exercised by the counterparty. A series of similar options failing to be acted upon should have alerted company management to potential fraud. However, as Figure 3 also shows, Allfirst managers did not have access to a list of those options that had expired without being exercised within 24 hours of them being placed. This is denoted by the vulnerability on the left hand side of the V^2 diagram. Prior to September 1998, Rusnak covered his tracks by creating bogus confirmations from the supposed counterparties to these transactions. The confirmations were intended to provide evidence that both parties had agreed upon these trade options. After that time, Rusnak managed to persuade the back-office staff not to pursue these confirmations for his trading activities. As can be seen from the V^2 diagram, their failure to confirm the transactions is partly explained by the difficulty of establishing contact with many of Rusnak's brokers who worked in the Asian offices of the counterparties. The trader's office hours often created considerable communications difficulties for Allfirst's back-office staff. Figure 3 also uses a triangle continuation symbol, labeled with a '2', to carry the analysis from the events surrounding Rusnak's appointment to the start of his fraud. As can be seen, flaws in the reporting and monitoring procedures for Rusnak's activities made it more likely that he would be able to persuade back-office staff not to confirm the matching pairs of bogus trades. These flaws stemmed in part from senior management's desire to support his 'novel' forms of arbitrage.



Figure 1: A V² Diagram of the Background to the Allfirst Fraud



Figure 2: A V² Diagram of the Events Leading to Rusnak's Appointment and Flaws in his Reporting Structure



Figure 3: A V² Diagram of Rusnak's Initial Balanced-Options Fraud

Figure 4 shows how Rusnak exploited further opportunities to expand both his trading activities and the range of bogus trades that were required to conceal his mounting losses. The top right event in Figure 4 denotes that Rusnak was offered net settlement agreements with a number of financial institutions (Promontory, 2002). These eventually developed into 'prime brokerage accounts'. Such facilities enabled the broker to settle spot foreign exchange transactions with the counterparties. Each of these individual trades was then rolled together into as larger forward transaction between the broker and Allfirst that could be settled on a fixed date every month. As can be seen, these agreements simplified multiple transactions between Allfirst and the counterparties into a smaller number of larger transactions with the brokers. This simplification had two effects. Firstly it reduced the number of operations for the Allfirst back-office. Secondly, it made it difficult for the back-office and others within Allfirst from monitoring the individual trades that were being roller together within Rusnak's prime brokerage accounts. This potential vulnerability is represented half way down Figure 4 on the right hand side. The problems of monitoring transactions through the prime brokerage accounts together with the ability to roll together individual transactions for periodic settlement together combined to create a situation in which Rusnak could exceed the limits on his trading that were routinely insisted upon by Allfirst. His ability to increase the scope and scale of his trading is shown in Figure 4 to have increased the amounts of his loses in both forward and spot In order to cover his losses, another cycle emerged in which he generated more bogus transactions using the transactions. balancing options approach, described in previous sections. Rusnak was also able to exploit vulnerabilities in the DEVON software. This was used to track trades across the prime brokerage accounts. He was able to enter bogus transactions into the system and then reverse them before the monthly settlement period. As can be seen, however, Figure 4 does not provide sufficient details about the nature of the underlying problems with the DEVON application. The vulnerability symbol is annotated with the comment; 'DEVON system vulnerabilities (further analysis?)'. The V^2 notation could be revised to explicitly represent this need for additional analysis. More symbols could be used to show those events and contextual factors, violations and vulnerabilities that have only been partially analyzed. This has not been done, however, in order to minimize the amount of investment that must be made in training to both read and eventually develop these diagrams.

The right-hand, lower portion of Figure 4 illustrates a series of events that threatened Rusnak's activities. It began when the Allfirst treasurer decided to introduce a charge on those activities that used the bank's balance sheet. Such a change would provide greater accountability, for example by exposing whether the profits generated by an activity actually justified the work created for those who must maintain the balance sheet. Questions began to be asked about whether the apparent profits from Rusnak's activities could justify his use of the balance sheet. The total volume of currency traded had risen rapidly over the year to January 2001 but net trading income remained almost the same. A significant proportion of this rise can be attributed to Rusnak's various trading activities. He was, therefore, told to reduce his use of the balance sheet. This not only curtailed his legitimate trading activities but also placed tight constraints on many of the bogus trades, even if many of those trades only made a fleeting appearance on the Allfrist books before being reversed. He had to identify an alternate source of funds to offset his previous losses and those that continued to accrue from his legitimate trading activities.

Figure 5 traces the Allfirst fraud from the point at which senior management began to question Rusnak's use of the bank's balance sheet. This is denoted by the continuation symbol, labeled 4, connecting this image with the V^2 diagram in Figure 4. Rusnak's need to find an alternate source of funds led him to sell long-term options that were deep in the money. As mentioned previously, these options quoted a strike price that was far above the currency's current spot price. Hence, the options represented a relatively high-risk for Allfirst and attracted a corresponding premium. However, Figure 5 also uses a contributory factor to denote that these 'deep in the money options can be viewed as a form of loan' and that 'Rusnak would need to get these liabilities off the books'. Allfirst would have to redeem them when the options were redeemed. Figure 5 denotes a further violation as Rusnak created bogus transactions to indicate that the original options had been repurchased. These activities again involved Rusnak's use of the balance sheet and so the Allfirst treasurer placed a limit of \$150 million on his trades.

Previous V^2 diagrams have shown how Rusnak was able to manipulate the DEVON system to conceal some of his transactions via the prime brokerage accounts. Figure 5 shows some of the consequences of these manipulations through the continuation symbol, labeled 5, that links back to the previous diagram. The misuse of the DEVON system, combined with the 'bogus' repurchasing of 'deep in the money' options distorted the Value at Risk (VaR) calculations that were introduced in previous sections. Figure 5 also illustrates further ways in which this risk assessment tool was undermined. Rusnak used 'holdover transactions' to disguise some of his trades. These transactions usually occurred after it was possible for them to be included in the day's accounts. They were, therefore, held over until they could be processed during the next trading day. Internal audit and risk control were aware that Rusnak was responsible for a large number of these transactions but they did not investigate. This observation is illustrated by the vulnerability at the top right of Figure 5. Holdover transactions were not entered directly onto the bank's trading software. There were no checks to determine whether transactions were actually entered into the following day's trading. All of these vulnerabilities can be seen as causal factors in a violation of audit procedures whereby Rusnak directly supplied risk group employees with on-line data for his holdover transactions.



Figure 4: A V² Diagram of Rusnak's Manipulation of Prime Brokerage Accounts



Figure 5: A V² Diagram of Rusnak's 'Deep in the Money' Options and the VaR Calculations



Figure 6: A V² Diagram of Software Issues

 V^2 diagrams can also focus in on particular aspects of a security related incident. For example, Figure 6 shows how a V^2 diagram can be constructed to look more narrowly at the role that software based systems played in the fraud. This is particularly important given continuing concerns about the management and oversight of access provided by this class of applications. The continuation symbol labeled 2a refers back to Figure 1. This described some of the contextual factors that stemmed from the merger between Allfirst and AIB. In particular, it relates to AIB's decision that Allfirst should be allowed considerable independence and that the new acquisition should be managed with a 'light hand'. AIB had been one of the first banks to invest in a software system called Opics. The Opics application automates and centralizes a number of back-office functions. It can also be used in conjunction with a 'sister-application' known as Tropics that supports currency trading. An important benefit of using these applications together is that they can enforce a separation of back-office and front-office activities. They can also be used to trace the confirmation of options that were created by the front-office staff and should have been monitored by back-office employees. Tropics was not installed at Allfirst. Hence the software did not support the tracking and clear division of responsibilities that might have prevented many of the vulnerabilities and violations that were identified in previous V^2 diagrams. As can be seen in Figure 6, the decision not to install Tropics was justified on many grounds. Firstly, the costs of the software may not have been justified by the relatively small size of the trading desk. Also, at the time of merger AIB appeared to be happy with the Allfirst risk control and trading statements. They arguably did not see any justification for the additional monitoring facilities provided by the The decision to invest in Tropics can also be partly explained by a failure to learn from the Barings Tropics application. experience where a trader had managed to erode the separation between front and back office functions. Finally, there was no tradition for preserving this separation in terms of the electronic systems that support the work of Allfirst staff. The outcomes from the decision not to install Tropics included the lack of any automatic confirmation for trades. The decision not to install Tropics also prevented any automatic warnings for traders when their activities exceeded credit limits.

Figure 6 illustrates how V^2 diagrams can be used to gradually piece together more detailed information from a variety of sources. These included the official initial investigation (Promontory, 2002) as well as a number of subsequent reports (Gallager 2002, de Fontnouvelle, Rosengren, DeJesus-Rueff and Jordan, 2004). These sources reveal that Allfirst did go ahead with the installation of the Opics back-office modules associated with the Tropics front-office application. This did help to generate warnings when credit limits were exceeded. However, as we have seen, a host of technical and organizational factors persuaded the back-office staff that these warnings indicated numerous trader errors rather than significant alarms about bogus trading activities.

In addition to the Opics and Tropics systems, Allfirst might have been protected by the introduction of the Crossmar software that was used by AIB. This application also provided automated confirmation for trades using a matching service. Allfirst did not use the Crossmar software and so most of the confirmation relied upon back-office staff to fax requests to overseas markets. This manual confirmation was vulnerable to interruption and dislocation due to overseas trading hours. It was also open to pressure from traders such as Rusnak. Although we have not included it in the current analysis, Figure 6 might also be extended to illustrate the additional pressures that Rusnak's activities created for the back-office staff. His bogus options relied upon the continual generation of additional transactions beyond his legitimate trading activity. One side-effect of the fraud would, therefore, have been to increase the workload on back-office staff which in turn may have left them even more vulnerable to attempts to delay or ignore confirmations on a rising number of trades. AIB had also decided to exploit a software application known as RiskBook. This uses front and back-office systems to calculate the bank's risk exposure. Previous sections have described how Rusnak was able to affect the VaR calculations and there is reason to suppose that the use RiskBook might have offered some protection against these actions. Allfirst were not, however, part of the first roll-out for the RiskBook software within Allfirst. It is deeply ironic that Rusnak had been asked to specify the requirements for this new risk management software.

Conclusions and Further Work

A number of commercial and governmental organizations have recently argued that we must look beyond the immediate events that surround security-related incidents if we are to address underlying vulnerabilities (Austin and Darby, 2003). It is important to look beyond the immediate acts of 'rogue traders' or individual employees if we are to correct the technical and managerial flaws that provide the opportunities for security to be compromised. This paper has, therefore, provides an introduction to Violation and Vulnerability analysis using V² diagrams. The key components of this technique are deliberately very simple; the intention is to minimize the time taken to learn how to read and construct these figures. The paper has, in contrast, been motivated by a complex case study. The intention has been to provide a sustained example at a level of detail that is appropriate to an initial investigation into complex security incidents. Previous pages have provided a sustained analysis of Rusnak's fraudulent transactions involving the Allfirst bank. This case study is appropriate because it involved many different violations, including the generation of bogus options. There were also tertiary failures in terms of the investigatory processes that might have uncovered the fraud long before bank personnel eventually detected it.

Much remains to be done. We are currently working with a number of organizations to extend and tailor the techniques in this paper to support security investigations in a range of different fields, including both financial and military systems. There is a common concern that the V^2 approach will provide a standard means of representing and modeling the outputs of an investigation into the causes of security-related incidents. In each case, however, we are being encouraged to extend the range of symbols represented in the diagrams. For example, these might be used to distinguish between different types of barriers that should have led to the identification of a violation or vulnerability. In terms of the Allfirst case study, the decision not to tell senior management about concerns over the Reuter's currency feed via Rusnak's PC would have to be represented using a different type of symbol. The intention is that analysts would then be encouraged to probe more deeply into the reasons why this potential warning was not acted upon. An important concern in this continuing work is, however, that the additional notational elements will increase the complexity of what is a deliberately simple approach. It is critical to avoid additional complexity in the analysis of what are almost always extremely complex events.

Further work also intends to explore the use of V^2 diagrams as a communication tool with wider applications. In particular, the outcomes of many security investigations must be communicated to diverse groups of stakeholders. These are not simply confined to security professionals and senior management in the target applications. In particular, it is often necessary to communicate findings about the course of an incident with members of the public who may potentially be called upon to act as jurors in subsequent litigation. The complexity of many recent security related incidents makes it vitally important that we find the means to help people understand the events and contributory factors that form the context for many adverse events. Similarly, political intervention is often triggered by incidents such as the Allfirst fraud. It can be difficult to draft effective legislation when key figures lack the necessary time and briefing material to fully follow the events that they seek to prevent.

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