

# David Cooper: a case study in financial abuse

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*The Telegraph* (Savill, 2009) reported that Sonia Crabb, an unemployed mother-of-five, and her boyfriend, Tony Junge, financially exploited David Cooper who experienced epilepsy and schizophrenia. David Cooper, described in court as having ‘below average intelligence’ (Savill, 2009) had inherited the 190-acre family farm following his father’s death in 1997. Crabb and Junge had befriended David, sold their own property in a neighbouring village, and moved into the farm in July 2004. David then proceeded to sell off his farmland, plot by plot, before transferring the farmhouse itself, reported to be worth £640,000, together with remaining land, to Crabb. David also made a new will, appointing Crabb as his executor and naming her as sole beneficiary.

Crabb and Junge were reported to have then spent £90,000 of David’s money renovating the farmhouse, for their own use. David meanwhile lived in an adjacent tack room, in conditions described as ‘squalid’ and ‘degrading’. His bath was in the same room as his make-shift kitchen, and he had no working lavatory. He had to climb a homemade ladder to get to bed. David died on 5 November 2006, aged 51, with undiagnosed type 1 diabetes. It was reported that he was so malnourished he had ‘symptoms of scurvy’. At the time of his death, David’s only remaining assets were a balance of £70 in one bank account and £60 in another (Savill, 2009).

Crabb and Junge were convicted of conspiracy to steal in April 2009 and given custodial sentences of 27 months and 24 months respectively. In Junge’s defence, he was described as ‘an unsophisticated individual’ who had been involved ‘to a lesser extent’ in the conspiracy (Magee, 2009). The court also heard that Crabb was of previous good character. It was also stressed that diabetes was understood to be the cause of David’s weight loss, not malnutrition (R v Crabb [2009]).

David died 11 months before the implementation of the *Mental Capacity Act 2005* (HM Government, 2005) (hereafter, the Act). This case study discusses the indicators that may have alerted individuals and services to the risk of financial

## abstract

This paper highlights the case of David Cooper, a vulnerable adult who was financially abused. It discusses the indicators that may have alerted individuals and services to the risk of financial abuse, and the measures taken by those aware of David’s potential vulnerability.

## key words

Financial abuse, mental capacity; Lasting Powers of Attorney

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abuse, and the measures taken by those aware of David's potential vulnerability.

Consideration is also given to the possible impact that the Act may have in affording protection to vulnerable individuals from the attentions and actions of financial predators.

## What are the signs of possible financial abuse?

Solicitors for the Elderly (2010) have assembled the following list of typical indicators that may signify a person is at risk of financial abuse.

- Signatures on cheques etc that do not resemble the person's signature or signed when the person cannot write.
- Any sudden changes in bank accounts, including unexplained withdrawals of large sums of money by a person accompanying the holder of the account.
- The sudden inclusion of additional names on the person's bank accounts. These individuals may be unrelated to the older person.
- Abrupt changes to or creation of wills.
- The sudden appearance of previously uninvolved relatives claiming their rights to the person's affairs and possessions.
- The unexplained sudden transfers of assets to a family member or someone outside the family.
- Numerous unpaid bills, overdue rent, care home bills, public utilities bills etc when there is someone who is supposed to be paying these bills on the person's behalf.
- Unusual concern by someone that an excessive amount of money is being expended on the care of the person.
- Lack of amenities such as TV, personal grooming items, appropriate clothing items that the person should be able to afford.
- The unexplained disappearance of funds or valuables such as art, silverware and jewellery.
- Deliberate isolation of the person from

friends and family, resulting in the carer alone having total control.

## David Cooper – the indicators

David had lived for in the same rural community all his life, and he was well known locally. Were there signs to alert his neighbours and other agencies to the possibility that he was particularly at risk, and if so, what action was taken in response?

### *Isolation of the victim*

Sonia Crabb first approached David in 2004 with an offer to care for his horses (*Daily Mail*, 2009). Their 'friendship' grew and she moved into the farmhouse, joined soon afterwards by her boyfriend and their five children. Thereafter, it appears that David became increasingly isolated. A six-foot wall was erected around the farmhouse, blocking David's access to the main road, which meant that he would have to cross fields when he wished to leave the property. In addition, it is reported that Crabb and Junge also sold his tractor – his one means of transport (Lakeman, 2009). Evidence given at the trial confirmed that local people had become aware of David's changing circumstances. They had been used to seeing David about in the village, following his father's death, often on their doorsteps, and sometimes lingering and reluctant to move on. He was seen less frequently following his friends' move into the farmhouse. Local people had also noticed parcels of his land advertised for sale on the internet. They expressed their concerns both to David's GP and to the local police (Green, 2009).

David's GP spoke with David regarding these concerns for his well-being. It was reported at the trial that David then presented himself at the local police station to make a complaint regarding what he perceived as unwelcome interference on the part of his neighbours.

Police officers also visited David at the farmhouse. They were met by Sonia Crabb, who advised that she was the lawful owner of the property, and also by David, providing assurances that all was well. Thereafter, no further plots of land were seen advertised on the internet (Grant, 2009).

### ***Unusual financial transactions***

Crabb had arranged for David to sign a batch of blank cheques (Lakeman, 2009). It was reported that she would then fill in the details, as and when she required funds. Substantial sums of money were also passing in and out of David's bank account, as parcels of land were regularly sold off, and then the proceeds from each sale withdrawn. Evidence was given during the trial that in the years following his father's death, David had, in any event, from time to time, sold off portions of his estate, to raise some cash to meet his ongoing needs (Green, 2009).

If there were noticeable irregularities or inconsistencies in David's banking practices, and it is not clear that there were, would it be realistic to expect bank staff to notice and take action? It is, of course, possible that the bank did contact David to discuss his banking arrangements. If they did so, other evidence of David's response when concerns were raised with him would suggest that he was unlikely to be receptive to their approach.

### ***Changes to a will and transfer of assets***

David had visited a solicitor's practice and given instructions in relation to the sale of various plots of land, for the making of his will, and for the transfer of his home and remaining land into the name of Sonia Crabb. What preventative action could a solicitor take, aside from advising David fully of the risks in proceeding with these

transactions and satisfying himself that David had the requisite mental capacity to give instructions on these matters?

Evidence given at the trial of Crabb and Junge was that a number of solicitors from different firms had been used by David throughout this period. A pattern emerged of solicitors being 'sacked' when the advice given was perhaps not acceptable or palatable to David, with new solicitors then being instructed. At least one solicitor was concerned enough to travel out to see David at the farmhouse, when having completed one transaction for David, he was consulted shortly afterwards in connection with a further sale. David's response was then to withdraw his instructions (Green, 2009).

Frustratingly, the solicitors' hands would have been tied by their professional duty of confidentiality towards capacious clients:

*'You and your firm must keep the affairs of clients and former clients confidential except where disclosure is required or permitted by law or by your client (or former client).'*  
(Solicitors' Regulation Authority, 2007)

This duty continues after the end of the retainer, although in David's case, it is reported that at least one solicitor is understood to have expressed concern in an 'off the record' telephone conversation with his successor.

In exceptional circumstances, a solicitor can be required to disclose confidential client information. For example, where the solicitor believes disclosure is necessary to prevent the client or a third party committing a criminal act that they reasonably believe is likely to result in serious bodily harm, or in instances involving the possible sexual or other physical abuse of children. There are currently no prescribed exceptions that relate specifically to the possible financial abuse of a vulnerable adult.

## David Cooper – post *Mental Capacity Act 2005*

Had it then been implemented, would the provisions of the Act have offered protection for David from the attentions of financial predators?

### *Presumption of capacity*

Judge Roger Jarvis, in sentencing Crabb and Junge, commented that David had been desperate for company and was ‘*very unworldly wise*’ (Magee, 2009). He was elsewhere described as ‘*educationally subnormal*’ (Lakeman, 2009), and having ‘*below average intelligence*’. Jurors heard that David believed Crabb’s story that she and Junge were actually brother and sister, and was duped into thinking he would eventually marry the mother-of-five (Magee, 2009).

David’s limitations, which could, in fairness, also be attributed to a sizeable proportion of the population, did not necessarily equate to the lack of requisite mental capacity to make gifts to Sonia Crabb.

Part 1, Section 1 of the Act sets out the guiding principles which provide (*inter alia*) that a person must be assumed to have capacity unless it is established that he or she lacks capacity, and a person is not to be treated as unable to make a decision merely because he or she makes an unwise decision.

David’s reported desire for female companionship may have been a strong motivating factor. His resulting relationship with Crabb appeared to lead to some very unwise decision-making, but would those poor decisions, collectively, necessarily be sufficient to rebut the presumption of capacity?

The most significant case regarding the capacity to make a gift remains *Re Beaney (Deceased)* (1978). The judgment in this case noted that if the effect of the gift

*‘is to dispose of the donor’s only asset of value and thus, for practical purposes, to pre-empt*

*the devolution of his estate under his will or intestacy, then the degree of understanding required is as high as that required for a will and the donor must understand the claims of all potential donees and the extent of the property to be disposed of’.*

In David’s case, as a man in his early 50s, making a gift of his home and his remaining capital to Crabb would impact substantially on his own financial security for the rest of his life. This would suggest that a higher degree of understanding might have been required.

This approach is reinforced in the provisions of the Act. Section 3 of the Act sets out the circumstances in which a person is deemed unable to make a decision for themselves as follows:

*‘(1) For the purposes of section 2, a person is unable to make a decision for himself if he is unable –*  
*(a) to understand the information relevant to the decision,*  
*(b) to retain that information,*  
*(c) to use or weigh that information as part of the process of making the decision, or*  
*(d) to communicate his decision (whether by talking, using sign language or any other means).’*

According to the *Mental Capacity Act 2005 Code of Practice*:

*‘Relevant information must include what the likely consequences of a decision would be (the possible effects of deciding one way or another) – and also the likely consequences of making no decision at all (section 3(4)). In some cases, it may be enough to give a broad explanation using simple language. But a person might need more detailed information or access to advice, depending on the decision that needs to be made. If a decision could have serious or grave consequences, it is even more important that a person understands*

*the information relevant to that decision.'*  
(Department for Constitutional Affairs, 2007)

It would appear that both pre- and post-implementation of the Act, the extent of the property being gifted by David would be highly relevant in any assessment of his mental capacity to make those gifts.

### ***Lasting Powers of Attorney***

From 1 October 2007, the Act allows an individual to give another person or persons authority to make decisions regarding their personal welfare or their property and financial affairs by making a Lasting Power of Attorney (LPA). In contrast to the simple format and procedure for making an Enduring Power of Attorney (EPA) under the *Enduring Powers of Attorney Act 1985* (HM Government, 1985), the LPA documentation and registration requirements are more complex and incorporate a number of features designed to safeguard against possible abuse.

If David had made an EPA under the terms of the earlier legislation, he may have remained vulnerable to financial abuse. Senior Judge Denzil Lush (former Master of

the Court of Protection) suggested on the BBC programme *Real Lives* in 2004 that in the region of 100,000 unregistered EPAs may be used to perpetrate financial abuse, and he estimated that between 10% and 15% of EPAs actually registered with the then Public Guardianship Office were being used as vehicles for abuse (Solicitors for the Elderly, 2010).

The choice of attorney is, of course, the critical factor, as illustrated by the experiences of Irene Watts (**Box 1**). Had David considered making an EPA, following on from his father's death, it would seem reasonable to assume that, post 2004, he would have chosen Sonia Crabb as his attorney.

The safeguarding advantages to the new LPA regime are embedded both into the documentation itself and into its procedures. An LPA must be a written document containing 'prescribed information' that draws the donor's attention to the extent of the power they are granting to their attorneys. The donor must include the names and contact details of up to five individuals who must be notified of any application to register the LPA with the Office of the Public Guardian (OPG), and the LPA must contain a certificate by an independent person who

#### **Box 1 Case study example of abuse of EPA**

Irene Watts was a widow who lived alone and was entering the early stages of dementia. She was befriended by a local man, Derek, who began to help out with her garden, and with repairs around the home. Derek 'groomed' his way into Irene's affections and Irene visited her solicitor to change her will and appoint Derek as her attorney under an EPA.

Derek used the EPA to extract funds from Irene's account and to take out a bank loan for his own use. A neighbour reported their concerns to the police, and Derek was successfully prosecuted and sent to prison. Irene was supported in instructing her solicitor to revoke the EPA.

On his release from prison, Derek started to visit the care home where Irene then resided, arguing that he was Irene's next of kin and producing the then-defunct EPA as evidence of his authority to continue to act in connection with Irene's affairs.

must confirm that the donor understands the LPA and that the donor is not under any pressure to make it (two certificate providers are required if the donor decides not to name any person to be notified).

The LPA cannot be used until it has been formally registered with the OPG, and once registered, the donor falls under the OPG's Safeguarding Vulnerable Adults Policy and within the protective ambit of the Court of Protection, with the associated investigative powers and authority to revoke the LPA and suspend or remove the attorney.

Would an LPA have provided any protection for David? Again, as with an EPA, the choice of attorney is critical. It is possible that concerns regarding undue influence may have come to light at some point had David decided to appoint Sonia Crabb as his attorney. However, with David so willingly signing over beneficial ownership of his assets to her in any event, it is unlikely that Sonia Crabb would have had need of the powers or authority expressly conveyed by an LPA in her favour.

### ***Wilful neglect or ill treatment***

Section 44 of the Act introduced a new criminal offence for a carer who wilfully neglects or ill treats a person lacking capacity. There is no similar offence on the statute books regarding adults with capacity, although Action on Elder Abuse (2010), in their consultation response to the Law Commission put the case for an offence of '*ill treating or neglecting a vulnerable adult with capacity*'.

Leaving aside the issue of David's capacity, in any event during the trial, Crabb denied adopting any caring role for David. At the eventual inquest into David's death, Michael Johnston, the coroner for West Dorset, recorded a verdict of death by natural causes, contributed to by neglect, but commented:

*'I am not saying and I am deliberately not saying whether the neglect was Mr Cooper's neglect or anybody else's. If he had sought medical help his death would almost certainly have been avoided'.* (Lakeman, 2009)

No charges have been brought against Crabb or Junge in relation to David's death.

### ***Valid gifts or theft?***

The Joint Committee appointed by the House of Commons and the House of Lords to scrutinise the provisions of the draft Mental Incapacity Bill recommended that the Section 44 offence referred to previously should be '*extended to include the misappropriation of the person's property and financial assets*' (Joint Committee, 2003). This was rejected by the previous government on the grounds that it would be very similar to the offence of theft, which was available in any event where an individual used the assets of a person who lacked capacity for their own benefit.

In bringing charges for conspiracy to steal against Crabb and Junge, the prosecution had to establish, to the satisfaction of the jury, that the substantial assets transferred by David to Crabb were not validly made gifts. As the circumstances of these gifts were only investigated following David's death, no formal assessment of David's mental capacity in relation to them would be available to the court.

However, even if David had been assessed as having the necessary mental capacity, was he acting freely in making them, or was he subject to undue influence? It is arguably difficult for any individual who finds themselves in a potentially abusive relationship to exercise fully informed choices in their decision-making. Typically, it is for the court to determine whether or not undue influence has been exercised.

Lord Slynn of Hadley outlined the issues in *R v Hinks* [2000]:

*'It is unlikely that a charge of theft will be brought where there is not clear evidence of at least some conduct of the defendant which includes an element of fraud or overt dishonesty or some undue influence or knowledge of the deficient capacity of the alleged donor.'*

Michael Tringham (2009), in his article 'Compelling intestacy' cited David's experiences as one argument for the case of compulsory intestacy, as he also considered the question of undue influence. Two and a half years after his death, David's body remained unburied as Crabb, serving the 27-month term for conspiracy to steal, remained the sole beneficiary and sole executor of his will, with control over his funeral arrangements. Again, Michael Johnston, Coroner, commented, 'Crabb is his executor and she has not relinquished her executorship, nor has she made arrangements for his funeral' (Hale, 2009).

Michael Tringham referred to Sir James Hanson's comments in *Wingrove v Wingrove* (1885) on the subject of undue influence specifically in relation to the making of a will:

*'What amounts to undue coercion varies with the strength of will ... if that will is weak due to mental or physical frailty, less force is required to overpower it. Coercion may be ... of different kinds, it may be in the grossest form, such as actual confinement or violence, or a person ... may have become so weak and feeble that a very little pressure will be sufficient to bring about the desired result.'*

This, Michael Tringham concludes, appears to describe David Cooper's case 'perfectly' (Tringham, 2009).

The investigating officer in David's case, DS Martin Jobe, has commented that if Crabb and Junge had spent just a few thousand pounds of David's own money on improving his own quarters, then it is conceivable that

they may have avoided conviction (Green, 2009). In such circumstances, it might have been more difficult to persuade the jury that David had not made valid and willing gifts to them, as it would have diminished the brutal contrast between David's squalid accommodation, described by DS Jobe as 'conditions that were not even fit for a dog' (Hale, 2009) and the adjacent expensively refurbished accommodation enjoyed by Crabb and Junge.

It may have been the notion that no person would willingly and freely accept and endure such a contrast that may have persuaded the jury that David must inevitably have been subjected to undue influence (Green, 2009).

## David Cooper – prevention and intervention

### Prevention

Were there additional measures that could have been taken that would have prevented David from ever coming to the attention of Crabb and Junge?

### Enduring Power of Attorney or Court of Protection?

Did David have the necessary mental capacity to receive and manage his substantial inheritance under the terms of his father's will? We do not know whether this was a consideration at the time of the administration of his father's estate. If David did not, then unless he had validly appointed an attorney under the terms of an Enduring Power of Attorney, with the authority to manage his inheritance for him, an application to the Court of Protection would have been necessary for the appointment of a property and financial affairs deputy to take on this role for David.

It is not difficult to see how the involvement of the Court of Protection

and a property and financial affairs deputy would have protected David's inheritance and made him personally much less of a target to financial predators. However, as successive solicitors acted on David's various instructions, presumably confident that he had the required mental capacity to so instruct them, it is doubtful that David would have been considered as properly falling within the jurisdiction of this particular Court at the relevant time.

### *Use of discretionary will trust*

David inherited his farm outright under the terms of his late father's will. We do not know the extent to which David's late father acknowledged and considered his son's potential vulnerability to abuse when discussing the terms of his own will with the family solicitor. If the question of David's vulnerability had arisen, (and of course it may not have) advice may have been properly given on the wisdom of including a discretionary trust within the will, with David as the primary but still only a potential discretionary beneficiary, with all decisions to release funds for his benefit left in the hands of the trustees.

David held only a provisional driving licence, and used to get about the farm on his tractor (Magee, 2009). At the trial of Crabb and Junge, evidence was given that David's father had sold off particular parcels of land prior to his death that could only be accessed by using the public roads. It would therefore appear that he did, to some extent, appreciate and make some provision for David's future, perhaps mindful of his son's limitations.

If advice was given on the wisdom of using a discretionary trust in place of an outright gift, it would still be for David's father to decide on and confirm the final instructions on the content of his will, and he would of course have remained free to ignore the advice of his solicitors.

## **Intervention**

### *To interfere or not to interfere?*

The debate regarding the extent to which the state should involve itself in the affairs of individuals who may be at risk continues. In his keynote speech to the Legal Action Group Community Care Conference, Lord Justice Munby commented on the delicate balance between the right to autonomy and protection:

*'Vulnerable adults, and their carers, look to the State – to a local authority – for the support, the assistance and the provision of services to which the law ... entitles them. They do not seek to be "controlled" by the State. The State must be careful to ensure that in rescuing a vulnerable adult from one type of abuse it does not expose them to the risk of treatment at the hands of the State, which, however well intentioned, can itself end up being abusive of their dignity, their happiness and indeed of their human rights.'*  
(Munby, 2010)

The challenge is to act in circumstances when individuals are unable to make free and informed choices as a consequence of a lack of capacity or undue influence, while protecting the rights of a person with capacity to make unwise decisions.

Action on Elder Abuse (2010) contrasts the case of a 'woman who makes an informed choice to allow a niece to continue stealing £10 per week from her purse because she chooses to benefit from the weekly companionship' to that of a 'woman who hands over the weekly £10 because she is fearful of the consequences'.

Friends and neighbours, health professionals, a number of solicitors and the police all followed up their individual concerns for David's well-being and expressed fears that he might be vulnerable to financial abuse. There is no suggestion that any

individual or organisation failed David in this regard. David, however, did not welcome their interference and their individual efforts were routinely rebuffed.

## Prevention and intervention – the future

Local safeguarding adults boards now bring together the key agencies that have a part to play in safeguarding – particularly social services, the National Health Service and the police, but also other organisations. Vulnerable person's officers appointed by the police, and the local authority safeguarding teams are now routinely contacted by those concerned about individuals who may be being subjected to some form of financial abuse.

However, there is currently still no legislative duty on a local authority to establish an adult safeguarding board, nor any duty on the relevant agencies to co-operate, such as that imposed for multi-agency public protection arrangements (MAPPA) and for safeguarding children under the *Children Act 2004* (HM Government, 2004). Campaigning groups such as Action on Elder Abuse have previously warned that the lack of such legal duties has, in some areas, led to a lack of engagement with adult protection by key agencies and inadequate funding for these services.

The Law Commission consultation on social care legislation (Law Commission, 2010) includes provisional proposals to address these and other shortfalls within the systems. Provisional proposals 12–18 propose an enhanced duty to co-operate, including specific provision to promote co-operation between organisations in safeguarding adults from abuse and neglect. Action on Elder Abuse (2010) comment that such a duty should be imposed to ensure '*investigations are meaningful and conclusions implementable*'.

Balancing the relationship between an individual's right to privacy and the need to disclose otherwise confidential information in

circumstances where a person, potentially with requisite mental capacity, may be subject to abuse will remain difficult, especially for those with professional duties of confidentiality.

Wherever intervention is deemed to be appropriate, its effectiveness will surely be enhanced where there is co-operation and sharing of relevant information. Had there then been a mechanism for sharing knowledge of David's changing circumstances, (including for the professionals a legal duty to disclose information in place of a professional obligation to preserve confidentiality), a more complete picture of his financial dealings and risk may have emerged, sufficient to justify further investigation and external interference in his affairs.

Otherwise, the main protective measure against such large-scale financial abuse remains in the hands of the extended family of a potentially vulnerable individual. This is to ensure, by use of a will and other appropriate trust and estate planning devices, that assets are available for that individual's use, but ring-fenced and protected from potential abusers.

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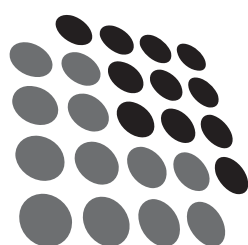
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