


Additional preliminary findings & observations

6. Questionable payments of at least RM 2mil to Ong Bee Ling – Dato' Alan's sister-in-law

- We also noted many payments to Ong Bee Ling that are purportedly payments on behalf of contractors such as Beaucon Construction Sdn Bhd, Tract Evo and S City.
- These payments are not attached with any supporting documents. The payment vouchers are authorized by Dato' Alan and there is no signature by the receiver of the payment. Some examples of these payment vouchers are as follow:
- Similar to the commission payments to Mr Raja Gopal that was instead paid to Ong Bee Ling, we noted no agreements and/ or letter of instruction by these contractors (i.e. Beaucon Construction Sdn Bhd, Tract Evo and S City) authorizing the payment to Ong Bee Ling.
- Besides, as highlighted above, Beaucon Construction Sdn Bhd shares a common director and shareholders of Beaucon Engineering (M) Sdn Bhd, which shares a common business address with Compact Ecology Sdn Bhd


可人兒 (馬) 有限公司
CAELY (M) SDN. BHD.
(Company No: 157982-V)
 Lot 2661, 3rd Mile, Jalan Maharaja 1, Seksyen 11, Bandar Baru Bangsar, Kuala Lumpur, Perak.
 Tel : 05-6218888 (20 Lines) Fax : 05-6215286, 6215115


ACCOUNT NO: Beaucon Construction s/b. FOLIO No. 10/014
 DATE: 04/10/14

PAYMENT/PETTY CASH VOUCHER

PARTICULARS		AMOUNT
Being payment on behalf to Ong Bee Ling for Fauca Project.		100,000.00
- TO deduct A/C Beaucon Construction-02		
TOTAL		100,000.00

CASH/CHEQUE No. 0440000400 **TOTAL** 100,000.00
 Prepared By: [Signature] Entered Account By: [Signature] Date Entered Account: [Signature]

Signature of Receiver


可人兒 (馬) 有限公司
CAELY (M) SDN. BHD.
(Company No: 157982-V)
 Lot 2661, 3rd Mile, Jalan Maharaja 1, Seksyen 11, Bandar Baru Bangsar, Kuala Lumpur, Perak.
 Tel : 05-6218888 (20 Lines) Fax : 05-6215286, 6215115

ACCOUNT NO: ACCOMMODATION S-City Construction - S-City Malaysia FOLIO No. 011403
 DATE: 11.1.14

PAYMENT/PETTY CASH VOUCHER

PARTICULARS		AMOUNT
Being payment to Ong Bee Ling on behalf of S-City Construction		20,000.00
TOTAL		20,000.00

CASH/CHEQUE No. 142055217 **TOTAL** 20,000.00
 Prepared By: [Signature] Entered Account By: [Signature] Date Entered Account: [Signature]

Signature of Receiver

**Cash withdrawals of at least RM 15mil through
Suhaimi bin Hussain**

Additional preliminary findings & observations

7. Cash withdrawals of at least RM 15mil through Suhaimi bin Hussain

- During our investigation, we noted numerous cheques written to one Suhaimi bin Hussain. According to Nancy, we understand that Suhaimi is employed as a lorry driver at CMSB who was also the authorized employee to withdraw cash for the company.
- All cheques written to Suhaimi are for cash withdrawal purposes at the instruction of Finance Department.
- We noted some payments to Suhaimi for cash withdrawal that appear to be legitimate. For example, staff salary advances, staff claims and general administrative expenses. These payments will be have supporting documents and the Payment Voucher will be signed off by the receiver.
- However, we noted numerous payments to Suhaimi for cash withdrawal that did not have supporting documents attached, nor the Payment Voucher signed off by the receiver. A majority of these payments relate to construction projects, more specifically, the FELCRA project.

Additional preliminary findings & observations

7. Cash withdrawals of at least RM 15mil through Suhaimi bin Hussain

- An example of cash withdrawals by Suhaimi with complete supporting documents, for the purpose of the Tapah Road project is as follow.

Supporting Documents for Payment to Choo Chan Heng

可人兒 (馬) 有限公司
CAELY (M) SDN. BHD.
(Company No. 157988-V)
Lot 2691, 3rd Mile, Jalan Mahatya Lela,
36000 Teluk Intan, Perak.
Tel : 05-6218888 (20 Lines) Fax : 05-6215286, 6215115

PAYMENT/PETTY CASH VOUCHER

FOLIO No. PV 17/10/14
DATE: 01/12/16

PARTICULARS	AMOUNT
Being Payment for Choo Chan Heng - Project Tapah Road (3rd Payment) - Final	3,200.00
TOTAL	3,200.00

CASH/CHEQUE No. 0682 000 654

Prepared By: [Signature] Entered Account By: [Signature] Checked By: [Signature] Date Entered Account: [Signature]

Signature of Receiver: [Signature]

Payment description indicates who payment is being made to

Signed by receiver

DATE: 21.07.2016
CHOO CHAN HENG
NO 9107 DOKS,
JALAN WOOD SAK HONG,
36000 TELUK INTAN, PERAK.
CAELY (M) SDN BHD
LOT NO. 2691, 3rd MILE
JALAN MAHATYA LELA
36000 TELUK INTAN, PERAK.

Attn: Dato Alan Cheuk Chi Lai, D.P.M.F.A.M.P

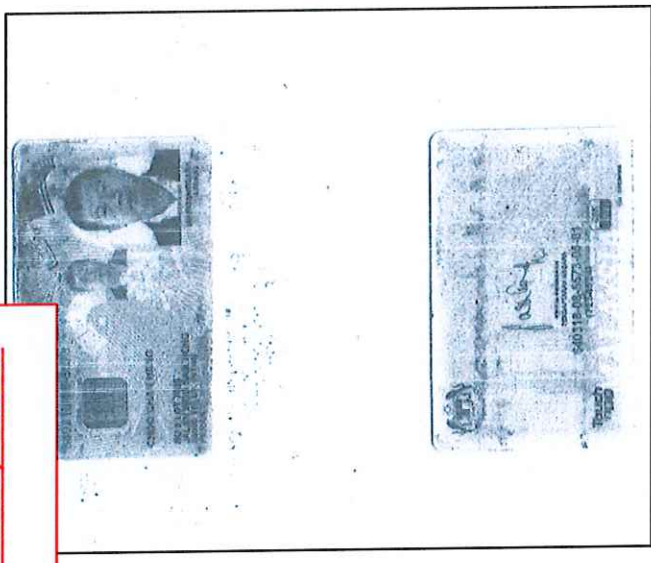
CAUTION: PEMBAYARAN BUNDE BARI TAPAH ROAD DI ATAS TANAH KEPULAUAN SELUS LEBIH RUMAH 232 EKAR, MURAH BANYAK PADANG, DEBAM BAYANG PADANG, PERAK HARUS BERTUKAR UNTUK TUKAR CAELY (M) SDN BHD.

MEMORANDUM PEMBAYARAN BERTAJUKAN YANG SUDAH SIAP

ITEM	DESCRIPTION	RATE (RM)	UNIT	AMOUNT (RM)
6543	12 Unit Rumah Teres 3 Tingkat (28' x 70') (lot 153-156, 160-163, 160-162)			
A1	R.C. Concrete Slab - Main Entrance	500.00	12	6,000.00
A2	P.C. Cover Slab for drain	600.00	12	7,200.00
B	11 Unit Kedai Haker 2 Tingkat (28' x 70') (lot 157-159, 164-173, 164-172)			
B1	R.C. Concrete Slab - Main Entrance	500.00	11	5,500.00
B2	P.C. Cover Slab for drain	600.00	11	6,600.00
C	Drainage Sempur 2 Unit	10,700.00	1	10,700.00
C1	R.C. Concrete Slab - Main Entrance	10,700.00	1	10,700.00
C2	Drainage 3 unit Rumah Sempur	30,000.00	3	30,000.00
	TOTAL:			66,000.00

CHOO CHAN HENG
(60318-08-5573)


cc: File Project



Additional preliminary findings & observations

7. Cash withdrawals of at least RM 15mil through Suhaimi bin Hussain

- An example of cash withdrawals by Suhaimi with complete supporting documents for the purpose of staff loan is as follow.






可久兒 (馬) 有限公司
CAELY (M) SDN. BHD.
(Company No: 1579884-V)
Lot 2661, 3rd Mile, Jalan Maharaja Lela,
56000 Tehsil Innam, Perak.
Tel : 05-6218888 (20 Lines) Fax : 05-6215286, 6215115

PAYMENT/PERTY CASH VOUCHER

ACCOUNT DR: Neelan - Staff Loan FOMO No: 14/040
DATE: 5/10/16

AMOUNT	PARTICULARS
5000.00	Request for money To deduct RM5000.00 per month from his salary - 02, Nov & Dec 2016 10/3/17 & requested by Neelan & Day Man Lela below
5000.00	TOTAL

CASH/CHEQUE No: <u>00426</u>	Entered Account By	Checked By	Date Entered Account
Prepared By: 	Authorised By: 		

Signature of Receiver: 



Detailed description of what the payment is for and who it is paid to

Signed by receiver

Additional preliminary findings & observations

7. Cash withdrawals of at least RM 15mil through Suhaimi bin Hussain

- In contract, below are some examples of questionable cash withdrawals for the FELCRA project that were not attached with any supporting documents.


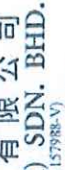
可人兒 (馬) 有限公司
CAELYGIRL (M) SDN. BHD.
 (Company No. 157982-V)
 Lot 2661, 3rd Mile, Jalan Maharaja Leha,
 36000 Teluk Intan, Perak.
 Tel: 05-6218888, 6212536 (20 Lines) Fax: 05-6215286, 6215115

PAYMENT/PETTY-CASH VOUCHER
 ACCOUNT DR: Felera Project
 FELCO No. 11008
 DATE: 11/2013
 AMOUNT: 16,000.00

Prepared By	Checked By	Entered Account By	Due Entered Account
<i>[Signature]</i>			
TOTAL 16,000.00			

CASHCHIEQUE No. 038164
 Paid By: *[Signature]*
 Received Account By: *[Signature]*
 Signature of Receiver: _____

1. Vague description

可人兒 (馬) 有限公司
CAELYGIRL (M) SDN. BHD.
 (Company No. 157982-V)
 Lot 2661, 3rd Mile, Jalan Maharaja Leha,
 36000 Teluk Intan, Perak.
 Tel: 05-6218888, 6212536 (20 Lines) Fax: 05-6215286, 6215115

PAYMENT/PETTY-CASH VOUCHER
 ACCOUNT DR: Felera Project
 FOHIO No. 11046
 DATE: 07/12/2013
 AMOUNT: 20,000.00

Prepared By	Checked By	Entered Account By	Due Entered Account
<i>[Signature]</i>			
TOTAL 20,000.00			

CASHCHIEQUE No. 030276
 Paid By: *[Signature]*
 Received Account By: *[Signature]*
 Signature of Receiver: _____

2. Large round figure payments

3. Not signed by receiver

**Questionable payments which are highly likely
kickbacks for FELCRA project**

Additional preliminary findings & observations

8. Questionable Payments which are highly likely bribes for FELCRA project

- Our investigations from Caely's server revealed a spreadsheet named "**FELCRA Payment 08-07-2014.xls**" which seem to outline the "commissions" that need to be paid for FELCRA projects, along with the payments on Caely's side for those commissions.
- A depiction of the above can be seen below which is a sheet titled "**Summary 1**" of the spreadsheet aforementioned:

Resolution issued in FY2013			
Contract bearing reference No.	Project Sum RM	10% Commission based RM	
TPKU167/11	1,776,175.00	177,617.50	
KPFB/FB/BT/CSB/2/12	1,914,840.10	191,484.01	
BGNU 331/11	47,936,716.50	4,793,671.65	
BGNWK 332/12	12,440,468.08	1,244,046.81	
Sub-Total	64,068,199.68	6,406,819.97	
BGNWK 28/13	69,041,690.00	6,904,169.00	
BGNWK 31/13	28,214,561.69	2,821,456.17	
Sub-Total	97,256,251.69	9,725,625.17	
Grand Total	161,324,451.37	16,132,445.14	
Amount Taken in FY2013			
TPKU 167/11		177,000.00	
KPFB/FB/BT/CSB/2/12		191,000.00	
BGNWK 332/12		425,000.00	
BGNU 331/11		4,339,000.00	
		5,132,000.00	
		1,274,819.97	

FELCRA Project Codes

FELCRA Project Codes

- The schedule above suggest that a commission of 10% of the project value would need to be paid totalling **RM16,132,445.14** (i.e. **RM161 million @ 10%**). The schedule above also suggest that Caely has paid a total of **RM 5,132,000.00**. This finding would corroborate with Mr. Choo's statement that about 10% "commission" would need to be paid for certain projects.

Additional preliminary findings & observations

8. Questionable Payments which are highly likely bribes for FELCRA projects

- In another sheet named "Kismajaya Chop & signed on PV" of the same spreadsheet, it outlined all the cheques which suggest were utilized for payment of "commissions" for "Kismajaya S/B - Site Supervision & Project Advisory Fees".
- An example is as follows:

Date	PV	Cheque No	Descriptions	Total
19/2/2013	Pv02/065	OCBC 029029	Kismajaya S/B - Site Supervision & Project Advisory Fees	20,000.00
20/2/2013	Pv02/071	OCBC 029035	Kismajaya S/B - Site Supervision & Project Advisory Fees	45,000.00
20/2/2013	Pv02/072	OCBC 029036	Kismajaya S/B - Site Supervision & Project Advisory Fees	50,000.00
20/2/2013	Pv02/073	OCBC 029037	Kismajaya S/B - Site Supervision & Project Advisory Fees	40,000.00
20/2/2013	Pv02/074	OCBC 029038	Kismajaya S/B - Site Supervision & Project Advisory Fees	50,000.00
20/2/2013	Pv02/076	MBB 041024	Kismajaya S/B - Site Supervision & Project Advisory Fees	40,000.00
20/2/2013	Pv02/077	MBB 041026	Kismajaya S/B - Site Supervision & Project Advisory Fees	50,000.00
20/2/2013	Pv02/078	MBB 041027	Kismajaya S/B - Site Supervision & Project Advisory Fees	35,000.00
20/2/2013	Pv02/079	MBB 041028	Kismajaya S/B - Site Supervision & Project Advisory Fees	45,000.00
20/2/2013	Pv02/080	MBB 041029	Kismajaya S/B - Site Supervision & Project Advisory Fees	50,000.00
			Total	425,000.00

Resolution issued in FY2013	Contract bearing reference No.	Project Sum RM	10% Commission based RM
	TPKU167/11	1,776,175.00	177,617.50
	KPFB/BBT/CSB/2/12	1,914,840.10	191,484.01
	BGNIU 331/11	47,936,716.50	4,793,671.65
	BGNWK 332/12	12,440,468.08	1,244,046.81
	Sub-Total	64,068,199.68	6,406,819.97
	BGNWK 28/13	69,041,690.00	6,904,169.00
	BGNWK 31/13	28,214,551.69	2,821,455.17
	Sub-Total	97,256,251.69	9,725,625.17
	Grand Total	161,324,451.37	16,132,445.14
	Amount Taken in FY2013		
	TPKU 167/11		177,000.00
	KPFB/BBT/CSB/2/12		191,000.00
	BGNWK 332/12		425,000.00
	BGNW 331/11		4,399,000.00
			5,132,000.00
			1,274,819.97

- We have traced the payee for the cheques outlined in the sheet named "Kismajaya Chop & signed on PV" (from 2013 onwards), through the Deavid system and noted that the cheques were all issued to Suhaimi bin Hussain, whom we have highlighted above is authorized to withdraw cash on CMSB's behalf.
- Thus, it is highly questionable on the need to pay Kismajaya in cash instead of cheque payments in Kismajaya's name.

Additional preliminary findings & observations

STRICTLY PRIVATE & CONFIDENTIAL
 Not to be distributed or circulated
 For internal use only.

8. Questionable Payments which are highly likely bribes for FELCRA projects

- Further, based on the schedule above – we noted that the sheet indicated “Resolution issued in FY2013”. Upon checking the data from the server, we were able to locate an undated CMSB’s director’s resolution for commission payment to Kismajaya Sdn Bhd for the same amount in the spreadsheet. It was noted that the resolution was signed by Datin Fong and Dato’ Chuah.

DCR No.: /13

CARELY (M) SDN BHD
 (Company No.: 157988-V)
 (Incorporated in Malaysia)

DIRECTORS’ RESOLUTION PASSED PURSUANT TO ARTICLE NO: 114 OF THE COMPANY’S ARTICLES OF ASSOCIATION

COMMISSION PAYMENT

RESOLVED:

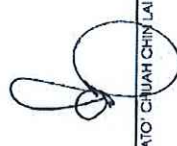
“THAT payment of the following commission to Kismajaya Sdn Bhd (Company No. 776653-W) of No. 528, Persiaran Greenhill, 30450 Ipoh, Perak Darul Ridzuan for the purpose of site supervision and Project/ Construct advisory for the following company/projects awarded by Koperasi Peserta-Peserta FELCRA Malaysia Berhad (“KPPB”) be and is hereby approved, confirmed and ratified:-”

Contract bearing reference no.	Project Sum RM	10% Commission based RM
TPKU 167/11	1,776,175.00	177,617.50
KPB/PB/67/C5B/2/12	1,914,840.10	191,484.01
BGNJ 331/11	47,936,716.50	4,793,671.65
BONWK 332/12	12,440,468.08	1,244,046.81
Total	64,068,199.68	6,406,819.97

DIRECTORS:


 DATIN FONG NYOK YOON

Date:


 DATO' CHUAH CHIN LAI

- We have yet to receive the complete minutes of meetings and resolution of CMSB from the new company secretary to verify and locate the resolution above.

Limitations & outstanding items

Limitations

Limitations		Status
1.	General Ledgers FY2014 and prior do not have transaction description as it was kept in manual excel form	Open
2.	Certain findings fall outside the period of our scope of work (i.e. FY2014 to FY2022)	Open
3.	Computers and emails of key suspects (such as Datin Fong and Dato' Alan) were not retained and/ or available	Open
4.	Certain financial documents (e.g. cheque butts) for CMSB's bank were taken by MACC	Open
5.	Physical documents for certain construction agreements have yet to be found	Open

Outstanding Items

STRICTLY PRIVATE & CONFIDENTIAL
Not to be distributed or circulated
For internal use only.

No.	Limitations	Status
1.	Cheque images requested on XXXXXX	Open

Next steps

QUALITY | INTEGRITY | INNOVATION | RELIABLE | ACCOUNTABLE

VIRDOS LIMA

Next steps

- Obtain cheque images for questionable payments.
- Continue analysing and reviewing the GLs and Payment Vouchers of CMSB to identify questionable transactions.
- Continue perusing and analysing the files obtained from CMSB's server.
- Clarification interview with Mr. Choo on his knowledge of MITSB.
- The Board and/ or Management may consider issuing a show-cause letter to Mr. Choo.

End of Update

ABOUT VL CONSULTANCY

VL Consultancy provides specialised counter fraud advisory services. Our experienced and highly skilled consultants ensures that we deliver quality services that is above our clients expectations. Our key focus is to build long term trust and confidence with our clients, and our stakeholders.

© 2022 Virdos Lima Consultancy (M) Sdn Bhd
All Rights Reserved.

This material has been prepared for general informational purposes only and is not intended to be relied upon as accounting, tax or other professional advice. Please refer to your advisors for specific advice.

The views of third parties set out in this publication are not necessarily the views of the VL Consultancy. Moreover, they should be seen in the context of the time they were made.



VIRDOS LIMA