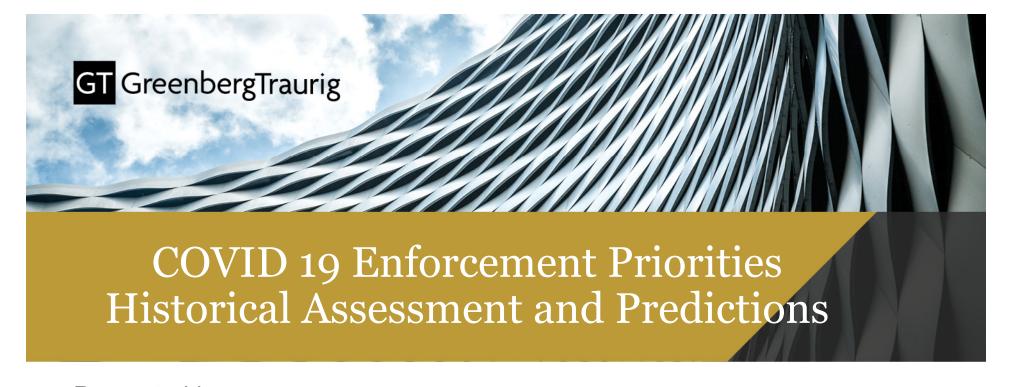
Welcome

Thank you for attending today's webinar. Under current circumstances, a significant portion of the workforce is working remotely; the higher utilization of the internet and servers impacts bandwidth. We appreciate your patience and understanding should any unexpected technical issues arise. As always, it is our intent to give you the information you need as seamlessly as possible.

Tips for best experience:

- Turn off unused or extra internet-connected devices. (TV streaming services, Smart devices, Alexa devices, etc.)
- Use a wired connection, if possible. (Ethernet connection from router to computer.)
- Do not run additional applications during presentation. (Outlook, Internet Browsers...)
- Mute your audio unless you are presenting.

The presentation will begin shortly.



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DISCUSSION

- I. Recent Disruptions and Disasters -- Enforcement Patterns
- II. COVID-19 Pandemic
 - A. In Context
 - B. Enforcement Mechanisms Already Underway
 - C. Enforcement Patterns Expected in Next Five Years
 - D. What You Can Do Now
- III. Discussion / Questions



I. Enforcement Patterns

International Incidents (Iraq War, 9/11)

Legislation and Rule Changes (Security/Surveillance)

Politicized review of causes and of changes in privacy/government intrusions

Primary Scrutiny - foreign policy, foreign aid, other countries

Economic Disruptions (Financial Crisis of 2008)

TARP / Stimulus Funds

Financial sector faced with structural changes /actions to prop up investments

Primary Scrutiny - banks, Wall Street

Natural Disasters (Katrina/Maria)

Government emergency relief with uncertain controls

Dispersed and smaller frauds

Primary Scrutiny - government abilities (FEMA), unequal treatment



A Crisis "Tsunami"

Combines Features of Previous Disruptions

- International conduct and coordination
- Volatile markets with extreme losses
- Substantial stimulus funds to population and targeted sectors

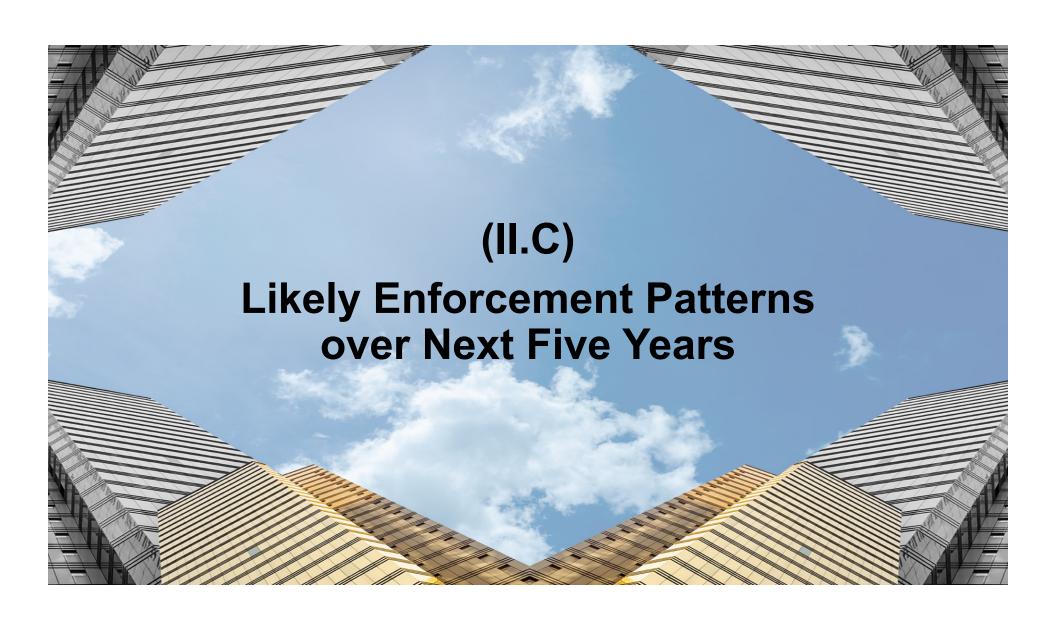
With Classic Enforcement Danger Conditions

- Unclear standards and requirements
- Unpredictable targets for, and definition of, misconduct
 - Media and Social Media / Government
- Highly politicized environment



New Enforcement Mechanisms

- Department of Justice
 - Prosecutions
 - DOJ Targeted Announcements
- New Inspector General
- New House Select Committee
- Liability Litigation



Nature of Expected Enforcements

- Highly Decentralized Investigations
 - Multiple government entities authorized to pursue civil and criminal false claims, fraud, antitrust, federal contract violations, state consumer protections
- Multiple Starting Points for Enforcements
 - Whistleblowers, Consumer, Employment, Contracts, Media, Congress
- Investigations Affected by Political Election and Climate

Specific Enforcements Expected

PANEL DISCUSSION



To Do Now

Watch What You Say

- One email or chat joking about excess profits or health hazards can result in a lot of attention.
- People are looking for someone to blame
- Remind employees
- Use "Washington Post" test for communications and crisis-based decisions
 - Being technically or legally "correct" won't stop investigations and enforcement actions

To Do Now

Consider and Document

- If something is really profitable because of the crisis, consider and document why it's a good idea
- If you have accepted government benefits, document rationale or facts demonstrating qualifications

• Involve Compliance Function in More Company Decisions

 Assume there will be review, audit, and enforcement of anything that creates profit or involves receiving government benefits

To Do Now

- Work with Known Regulators
 - Understand that typical regulatory inquiries may not be typical
- Work with Inhouse and Outside Counsel

