



Business Risk Through a Government Lens:

Putting Your Company in the Best Light

Lori Vassar, Esq., CCEP, CFE
Daniel Coney, CCEP, CFE, CFCS



**I am familiar with the Office of the Inspector
General and what their mission is?**

Yes

No

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Coast Guard Photo, <http://coastguard.dodlive.mil/files/2017/09/5-Deepwater-Horizon.jpg>



The Human Costs of Compliance Failures



Coast Guard Photo, http://cgvi.uscg.mil/media/main.php?g2_itemId=841701



Processing Plants



Chemical Safety Board Photo, http://www.csb.gov/assets/news/image/BP_PLANT_EXPLOSION-1_lowres2.jpg



Pipeline Blowout



By Brocken Inaglor - Own work, CC BY-SA 3.0, <https://commons.wikimedia.org/w/index.php?curid=11488373>



Storage Facilities



By Jonathan Perea - Own work, CC BY-SA 2.0; <https://www.flickr.com/photos/kianjacy/5787021923>



**A MISTAKE REPEATED
MORE THAN ONCE IS
A DECISION**



**In the vast number of cases,
you and your employees are
doing your best to:**

- **be diligent**
- **anticipate risks**
- **take steps to limit those risks**

**Employees of the OIG receive performance
ratings based on the number of convictions
and recoveries they obtain**

True

False

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Most Cases are Not Criminal

NOT GUILTY



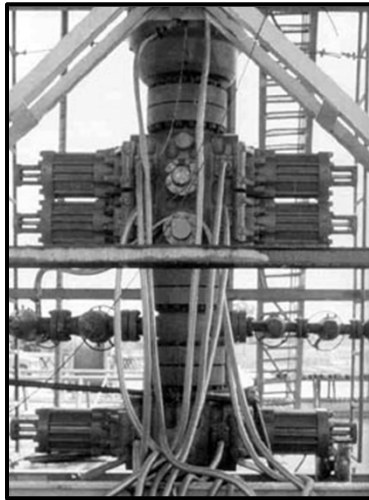
But sometimes...



By Ron Riccio- Own work, CC BY-SA 2.0; <https://www.flickr.com/photos/starwarsblog/793008715>



Case Study: False Certification BOP and Hot Work



OSHA Photo,
https://commons.wikimedia.org/wiki/File:OSHA_Blowout_preventer.jpg



Case Study: Improper Oil Discharge into the Gulf



By U.S. — NOAA - <http://response.restoration.noaa.gov/index.php>, Public Domain, <https://commons.wikimedia.org/w/index.php?curid=1830925>



Case Study: False Statements



By Messina, John, 1940-. Photographer (NARA record: 8464458) (U.S. National Archives and Records Administration) [Public domain], via Wikimedia Commons



Case Study: Failure to Correct Indian Royalty Payments



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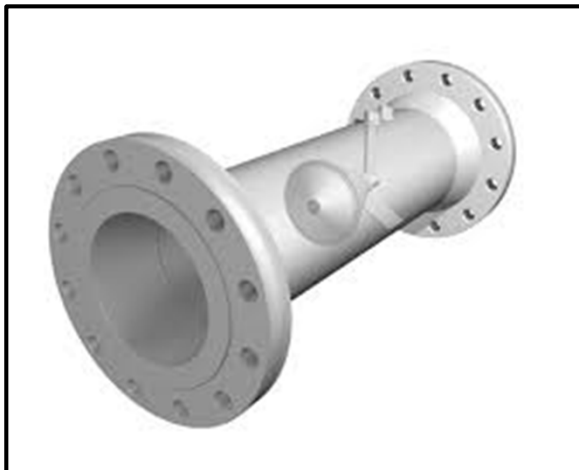
Case Study: False Documents Provided to ONRR to Avoid Payment



By Nick Youngson, CC BY-SA 3.0; <http://thebluediamondgallery.com/bankruptcy.html>



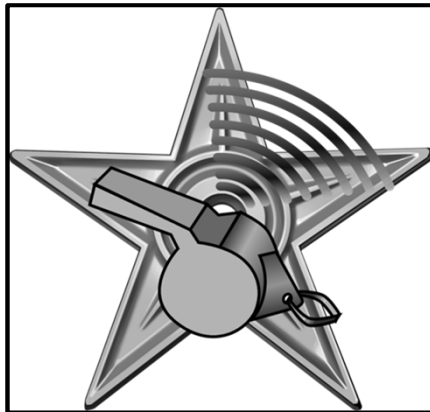
Case Study: Underreporting of Coalbed Methane



By McCrometer, Inc., CC BY-SA 3.0; https://commons.wikimedia.org/wiki/File:VW8-WN-RF-Clis300_composite.Low_Res.jpg



Case Study: Corporate Collusion to Reduce Bid Prices on Federal Leases



By Pedant, et.al., CC BY-SA 3.0; https://commons.wikimedia.org/wiki/File:Barnstar_Whistleblower.png



Investigation Examples



Types of allegations that we typically investigate:

- **Misreporting and/or failure to report production or make royalty payments**
- **Non-Compliance with contract requirements resulting in loss of income due to lower sales prices**
- **Intentional alteration of gas meters to reduce reportable production volumes**



Investigation Examples

- **Marketable condition – improper deduction of transportation and processing costs**
- **Non-arms length sales transactions**
- **Horizontally drilling into and producing from Federal or Indian land without a lease**
- **Falsification of safety or environmental tests**
- **Failure to report and cover up an oil spill**
- **Theft of product**

I know what debarment is.

True

False

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Section 746 of the Consolidated Appropriations Act, 2017,
Pub. L. No. 115-31,
and FAR 9.104-5

There are other potential,
administrative consequences for a
felony criminal conviction...

Suspension & Debarment



What is Suspension and
Debarment?



BANNED!



Who can be suspended or debarred?

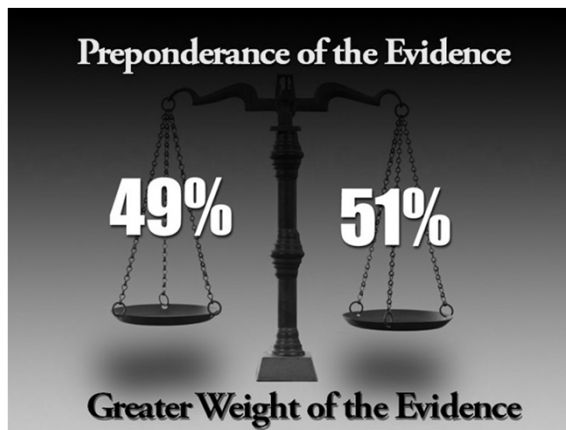


Is there an evidentiary standard which must be met for a suspension?





Is there an evidentiary standard which must be met for a debarment?



When it all goes wrong





How?

Proactive
Responsible
Truthful



By Nick Youngson, CC BY-SA 3.0 - link to - <http://nyphotographic.com/>



Get out in front of it and show you're responsible

- **Don't wait for an indictment or conviction**
- **Meet agency officials early**
- **Recognize and show compliance and ethics is important**
- **Discuss corrective actions**
- **Be Truthful**



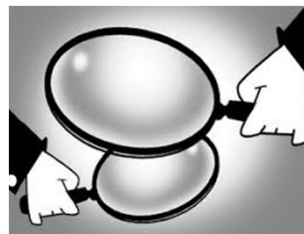
Actions Make a Difference



part of
a set of ideas
policy. noun
course of
adopted



Actions Make a Difference





Put your best foot forward with debarring officials



Methods of Contacting the OIG

Mail: ***U.S. Department of the Interior
Office of Inspector General
1849 C Street, NW (Mail Stop 5341)
Washington, DC 20240***

Internet: ***www.doioig.gov/hotline***

Phone: ***1-800-424-5081***

Fax: ***(703) 487-5402
(Attention: Hotline Operations)***

Lori Vassar, 202-219-0246, lori_vassar@doioig.gov

Daniel Coney, 303-985-6782 or daniel_coney@doioig.gov

