Business Risk Through a Government Lens:
Putting Your Company in the Best Light

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

Yes

No
The Human Costs of Compliance Failures
Storage Facilities

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
Most Cases are Not Criminal

**NOT GUILTY**

But sometimes…
Case Study: False Certification
BOP and Hot Work

Case Study: Improper Oil Discharge into the Gulf
Case Study: False Statements

Case Study: Failure to Correct Indian Royalty Payments
Case Study: False Documents Provided to ONRR to Avoid Payment

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Case Study: Underreporting of Coalbed Methane

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

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

Suspension & Debarment

What is Suspension and Debarment?
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?

Preponderance of the Evidence

49% 51%

Greater Weight of the Evidence

When it all goes wrong
How?

Proactive
Responsible
Truthful

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

policy. noun part of a set of ideas, course of action, or adopted or recommended plan.
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)
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