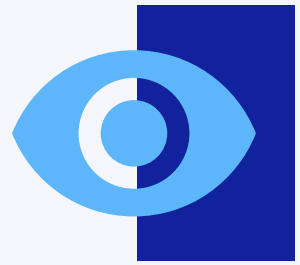


WHEN IS AN INVESTIGATION WARRANTED?

THE DECISION MAKING PROCESS

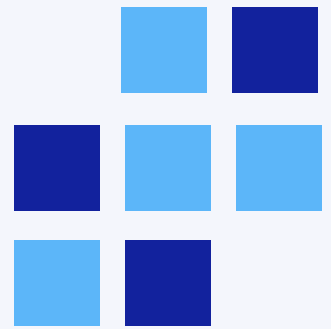
IS THE COMPLAINT CREDIBLE?

Evaluate the allegation and determine if the complainant is passing on information overheard or firsthand? Can you identify others than can substantiate the allegation or provide further evidence? Does the evidence provided show signs of credibility?



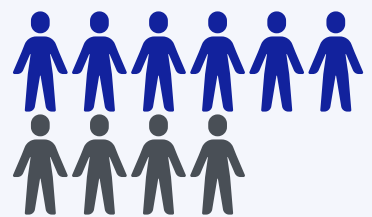
IS AN INVESTIGATION REQUIRED BY ANY LAW, REGULATION, OR CORPORATE POLICY?

Some corporations and regulated entities may have legal obligations to conduct an investigation. For example, financial services firms that are regulated by SEC may have obligations to self-report violations.



IS THE EMPLOYEE PART OF A COLLECTIVE BARGAINING AGREEMENT (CBA) OR UNION?

CBA or union contracts may outline and determine the appropriate course of action.



WHO WILL CONDUCT THE INVESTIGATION?

An internal investigation may be conducted by the organization's in-house counsel or compliance team if the option is available. However, if the misconduct is widespread, involves senior management, or simply cannot be handled subjectively, the investigation should likely be conducted by outside counsel.



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