

## Ethics and Business Conduct Experience

Written by Administrator

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- Participated in supporting investigations of alleged False Claims Act violations and defective pricing allegations. Primary liaison with DCAA and Naval Criminal Investigative Service (NCIS).
- Supported contract compliance-related hotline investigations under direction of internal Counsel for a multi-billion dollar Engineering/Construction contractor.
- On behalf of PwC Assurance, monitored and supported SEC regulation "10(a)" investigation into potential returns and allowances manipulation by a US-based subsidiary of a foreign consumer products manufacturer.
- Under direction of external counsel, led an audit committee-sponsored investigation into potential gratuity acceptance and expense report fraud for a multi-billion dollar SEC-registrant (commercial retailer of consumer products).
- Under direction of external counsel, led the investigation into Government contract cost accounting practices and business controls of a \$150 million Navy equipment manufacturer, including review of alleged TINA violations and indirect rate calculation errors.
- Under director of internal and external counsel, led team in support of aviation maintenance contractor's Department of Defense Voluntary Disclosure investigation, which included a forensic accounting analysis of \$50 million in billings, review of internal controls, and assessment of accounting transactions for compliance with applicable statutes, regulations, and contract terms and conditions. Efforts included calculation of Government's loss (quantum), briefing corporate management, and briefings to Army CIC, DCAA investigators, and DoJ attorneys. Project resulted in an acceptable settlement for contractor and allegations of several criminal felonies for Contracting Officer's Technical Representative (COTR).
- Author, "DCAA Access to Sarbanes-Oxley Working Papers: Does Financial Transparency Mean an Open-Door Policy" (privately published for PwC clients)
- Author, "Preparing for Recovery Audits" (Contract Management, Oct. 2003)
- Moderated panel discussing "Contractor Ethics and Mandatory Disclosure" at the National Defense Industrial Association (NDIA) 2009 Annual Education Seminar.
- Presentation to various NCMA Chapters: "Rethinking Contract Compliance: A Roadmap Toward a 21st Century Program"
- Led outsourced internal audit teams at several aerospace & defense entities. Led team evaluating compliance and business practice compliance at the Federal business unit of a multi-billion dollar publicly traded entity. The resulting report, performed under privilege, identified several internal control gaps that exposed the entity to allegations of violation of the Trade Agreements Act and other statutory/regulatory requirements associated with its General Services Administration Multiple Award Contract. Briefed the final report to General Counsel and the Board of Directors.
- Document Retention in the Information Age – National Contract Management Association South Bay Chapter, September 2005

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