

INDEX

A

acquisition fraud, 14
Acquisition Fraud Counsels (AFCs), 7–8, 10, 11
administrative agreements, 47
administrative compliance agreements, 47
administrative offsets provision, 55
Administrative Procedure Act (APA), 39
administrative remedies, 4–5. *See also* remedies
Advanced Data Analysis & Mining Lab, 32
Air Force
 Audit Agency, 8
 Office of Contractor Responsibility, 5
 Office of Special Investigations, 8, 10
 Space and Missile Command, 45
Air Force Instruction 51-1101 (Air Force
 Procurement Fraud Remedies Program), 6–12
 acquisition fraud counsels, 7–8
 communication/cooperation/coordination, 8–11
 organization, 6–7
 process and procedures, 11–12
 roles/responsibilities, 6–7
Allison Engine Co. v. United States
 ex rel. Sanders, 70–71
anti-bribery laws, 59–63
Anti-Kickback Act of 1946, 53
Anti-Kickback Act of 1986, 18, 51–59
 administrative offsets provision, 55
 brief summary, 51–59
 case laws, 55–56
 civil and criminal penalties, 55
 civil settlements, 58–59
 contracts greater than \$100,000, 52, 54
 corporate liability for employee conduct, 57–58
 favorable treatment, 56–57
 guilty pleas, 58–59
 key definitions, 52–53
 mandatory disclosure provision, 52
 purpose and scope of, 53–55
Armed Services Board of Contract
 Appeals (ASBCA), 93–94
Army Criminal Investigations Command, 13
Army Instruction 27-40, 12–13
Army Procurement Fraud Division, 5, 12
attorney-client privilege
 in foreign jurisdictions, 120
 protecting, 116–117
Attorney General, Parallel
 Proceedings Memo, 23–24
attorneys
 acquisition fraud counsels, 7–8, 10, 11

 attorney-client privilege, 116–117
 defense counsels, 12, 112
 government counsels, 3
 in-house counsel, 115
 outside counsel, 106, 115, 142
 oversight and management of internal
 investigations, 116–117
 roles of, 115
 separate counsels for individual employees, 117
auditors, brainstorming sessions, 20

B

Bennett, John (subcontractor), 57
Big Crow program, 65
billing process, 71
blocking statutes, 120
Boards of Contract Appeals, 83
brainstorming, 20
bribery, 59–63
 anti-bribery laws, 59–63
 debarment in, 36
 defined, 59
 favorable treatment, 57
 kickbacks as, 53
Business Development Program
 sole-source contracts, 65
business ethics and awareness
 compliance, 124–133
 authorities, 126–131
 contractor integrity programs, 125–126
 guidelines, 126–131
 practical considerations, 131–133
business size, 43
buying commands, 102
Byrd, Robert, 85

C

CAGE code, 42
categorization, 119
centralized organizations, 5
certification, 72
Chapman Law Firm, LPA v. United States, 71–72
Chiefs of Contracting Office, 10
Chiles, Lawton, 85
Christiansen, Bradley, 59
Civil Division, Department of Justice, 9, 46
Civil False Claims Act, 64, 66
civil investigative demands (CIDs), 3, 70,
 114, 141–142. *See also* subpoenas
civil remedies, 4, 101. *See also* remedies
civil settlements, 18, 58–59, 76

- claims
 - in civil FCA, 67
 - counterclaims, 81–92
 - denial of, 93–94
 - false, 68
 - fraudulent, 67
 - how claims are brought, 69
 - reverse false claims, 68–69
- classified documents, 140
- clustering, 119
- Collins M. Cleve, 65–66
- Combatant Commands, 3
- Commanding General of Major Commands, 13
- Commercial Contractors, Inc. v. United States*, 87 n.210
- company records, preservation of, 115
- company-to-company debarment, 38
- company-to-individual debarment, 38
- compliance risks, 124
- concept searching, 119
- conspiracy, 68
- contract auditors, brainstorming sessions, 20
- Contract Disputes Act (CDA),
 - 83, 84–85, 86–87, 93
- contracting officers, 47, 102
- Contractor Code of Business
 - Ethics and Conduct, 27
- contractor integrity programs, 125–126
- contractors, 3, 6
 - defined, 42
 - mandatory disclosure rule for, 26–30
 - prime, 53, 54, 56 n.53
 - quality assurance, 96–97
 - record-keeping, 89
 - responsibility, 99
 - subcontractors, 56 n.53
 - warrants, 93
 - withholding of payments to, 99–100
- contract remedies, 5, 92–100. *See also* remedies
 - breach of warranty, 92–93
 - contract rescission/cancellation, 94
 - denial of claims, 93–94
 - facility clearance revocation, 100
 - nonaward of contract based on
 - nonresponsibility, 99
 - price reduction, 94
 - reducing fees or price for
 - nonperformance, 96–98
 - reformation, 94–95
 - rejection of nonconforming goods, 94–95
 - removal from lists of trusted suppliers, 99
 - termination for default, 96
 - unilateral contract modification, 98
 - withholding of payments to contractors, 99–100
 - withholding payments, 96–98
- contracts
 - interpretation, 90
 - nonperformance of, 36
 - prime, 51, 52
 - records of, 89
 - rescission or cancellation of, 94
 - subcontract, 52–53
- controversies, 61–62
- Coordination of Parallel Criminal, Civil, Regulatory, and Administrative Proceedings (Parallel Proceedings Memo), 22–25
- Coordination of Remedies for Fraud and Corruption Related to Procurement Activities* (DODI 7050.05), 3
- corporate liability, for employee conduct, 57–58
- corporate Miranda warnings, 116
- cost mischarging, 65
- Council of the Inspectors General on Integrity and Efficiency (CIGIE), 16, 32–35
- counsels. *See* attorneys
- Counterclaim in Fraud Act, 85
- counterclaims in fraud, 81–92
 - avoiding, 91–92
 - defending against government, 88–90
 - how it is used by the government, 86–88
 - how it works, 82–83
 - where it is used by the government, 83–85
- Court of Appeals for the Federal Circuit, 84
- Court of Claims Act, 82
- Court of Federal Claims, 71, 81, 83–84, 86, 88, 90, 91
- Criminal Division, Department of Justice, 9, 46
- Criminal False Claims Act, 67
- Criminal Investigative Command, 13
- criminal remedies, 4, 101. *See also* remedies
- crisis, 113
- crisis management, 113–115
 - adverse media coverage, 114
 - adverse product quality report, 115
 - civil investigative demands, 114
 - company as crime victim, 113
 - employees interviewed by law enforcement, 114
 - environmental issues, 113
 - requests for cooperation in investigation, 114
 - safety issues, 113
 - search warrants, 113
 - subpoenas, 114
 - whistleblower retaliation claim, 114
- cultural differences, 120
- customer interaction training, 123–124
- cyber attacks, 113

D

Daewoo Engineering & Construction

Co. v. United States, 90

data privacy laws, 120

Data Protection Act, 119

debarments, 35–44, 101. *See also* suspensions

catch-all provisions for, 36–37

causes for, 36

company-to-company, 38

company-to-individual, 38

decline in, 44

defined, 35–44

disclosure of overpayments, 28

effectiveness of, 48

individual-to-company, 38

mitigating factors, 37

notice of proposed debarment, 36

referrals for, 12

request for reduction of duration, 38

scope of, 38

deduplication, 119

default, termination for, 96

defective pricing, 65

Defence Agencies, 4

defendants, 77–78

Defense Contract Audit Agency

(DCAA), 8, 30, 102

Defense Contract Management

Agency (DCMA), 8, 30, 102

Defense Contract Management Agency

Contract Integrity Center, 5

defense counsels, 3, 6, 12, 112

Defense Criminal Investigative

Service (DCIS), 17

Defense Logistics Agency (DLA), 8, 41, 43

de minimis threshold, 29

Department of Defense (DoD)

Field Activities, 4

Instruction 7050.05, 3–6

post-employment restrictions, 78–79

Procurement Fraud Working Group, 31–32

Department of Defense Inspector General

contractor disclosures, 10

DODI 7050.05, 3

Guidance Fraud Referrals website, 25–26

procurement fraud cases, 65

Department of Defense Office of Inspector General

Semiannual Report to Congress, 17

Department of Health and Human

Services (DHHS), 40

Department of Homeland Security (DHS), 40

Department of Housing and Urban

Development (HUD), 71–72

Department of Justice (DoJ)

acquisition fraud counsels, 7–8

Civil Division, 9, 46

Criminal Division, 9, 46

Office of National Courts in the

Commercial Litigation, 86

Parallel Proceedings Memo, 22–25

as stakeholder in fraud cases, 8–9, 102

Department of Navy (DON), 14–15, 41, 43

Derco Aerospace Inc., 57

Directive on Data Protection (95/46/EC), 120

disclosures, mandatory, 26–30, 48, 102, 123

documents

classified, 140

collection and preservation of, 108–109, 115

company records, 115

counterclaims in fraud, 91

custodians, 118

hold order, 118

privacy issues, 119

search warrants, 138, 140

DoD/NASA Procurement Fraud

Working Group, 31–32

Donat Gerg Haustechnik, Appeals of, 93

Don Brady Construction, Inc., 65

Don't Let the Toolbox Rust manual (CIGIE), 33

double billing, 71

Double Jeopardy Clause, 73

double payment, 89

Due Process Clause, 73

DUNS number, 42

duty to preserve, 142

E

effectiveness, 126

Eighth Amendment, 73

electronically stored information (ESI),

114, 117–118, 139–140, 141

e-mail threading, 119

embezzlement, 36

employees

corporate liability for employee conduct, 57–58

counsels for, 117

detaining, 138

interviews by law enforcement, 114

prime contractor employees, 53

rights, 138

subcontractor employees, 53

employment laws, 120

environmental issues, 113

Environmental Protection Agency (EPA), 41, 43

Equal Protection Clause, 73

Escobar decision, 74, 76, 77

- evidence
 - archiving, 118
 - credible, 26, 27–28
 - custodians, 118
 - document hold order, 118
 - electronic document retention, 118
 - preservation of, 117–119
 - review process, 118–119
- exclusions, 48
 - business size and, 43
 - GSA, 42
 - SAM, 42
 - statutory, 44–46
- F**
- facility clearance (FCL) revocation, 100
- facility fees, 73
- false claims, 68
 - reverse, 68–69
- False Claims Act (FCA), 4, 29, 66–70, 85
 - cases, 70–75
 - certification, 72
 - Civil False Claims Act, 66
 - civil investigative demands, 70
 - civil penalties, 86
 - claims in, 67
 - conspiracy provision, 68
 - constitutional protections, 73–74
 - Criminal False Claims Act, 67
 - defendants, 77–78
 - enactment of, 82
 - enforcement trends, 77–78
 - false claims provision, 68
 - false/fraudulent in, 67, 72
 - false records provision, 68
 - health care, 72–73
 - how claims are brought, 69
 - intent, 70–71
 - issues for government contractors, 75–77
 - key definitions, 67–68
 - knowledge, 71–72
 - knowledge in, 67
 - materiality in, 68, 74–75, 77
 - qui tam* limitations, 69–70
 - qui tam* procedure, 11, 46–47, 69
 - qui tam* provisions, 66
 - reverse false claims provision, 68–69
 - settlements, 17, 18, 29
 - theories in, 68–69
 - violation of, 26, 28
 - false records, 68
 - false statements, 36
 - False Statements Act, 81
 - falsification of records, 36
 - falsity, 67, 72
 - FAR Council, 27, 28
 - Fattah, Chaka, Sr., 63
 - favorable treatment, 52, 56–57
 - Federal Acquisition Regulation (FAR), 39
 - 3.1000, 125
 - 3.1002, 127
 - 8.406-3, 95–96
 - 9.1, 99
 - 9.103, 99
 - 9.104-1(d), 76
 - 9.207, 99
 - 9.4, 28, 35, 47
 - 9.402(a), 42
 - 9.406, 12
 - 9.406-1(a) mitigation factors, 39, 49, 103
 - 32.006, 99–100
 - 33.205, 94–95
 - 33.210, 93–94
 - 43, 98
 - 46.1, 96–98
 - 46.4, 96
 - 46.6, 96–98
 - 46.7, 92–93
 - 46.407, 95–96
 - 46.702, 93
 - 52.203-8, 94
 - 52.203-10, 94
 - 52.203-13, 27, 125, 128
 - 52.212-4, 96–98
 - 52.246-3, 95–96
 - Code of Business Ethics and
 - Conducts clause, 123–124
 - Contractor Code of Business
 - Ethics and Conduct, 27
 - Federal Acquisition Regulation
 - Disclosure Program, 17–18
 - contractor responsibility, 26
 - Federal Bureau of Investigation, 46, 102
 - Federal Highway Administration, 75
 - Federal Rules of Civil Procedure,
 - Subpart 46.407, 97–98
 - Federal Rules of Criminal Procedure, 46
 - Fifth Amendment, 73
 - Fifth Circuit, 63, 75
 - firm-fixed capability payment, 89
 - first to file, 69
 - Food and Drug Administration, 75
 - Forfeiture of False Claims Act, 82
 - forgery, 36
 - fraud
 - acquisition, 14

- as affirmative defense, 81–92
- clear and convincing evidence for, 88–89
- counterclaims in, 81–92
- defined, 1
- general indicators, 22, 25–26
- management-related indicators, 25–26
- procurement, 1–2
- triangle, 20, 25–26
- fraud fighters, 1, 31
- Freedom of Information Act (FOIA), 11

G

- General Accounting Office (GAO), 85
- General Fraud Indicators, 22, 25–26
- General Services Administration (GSA), 41, 43
- General Services Administration
 - Office of Inspector General
 - debarments, 42
 - Office of Audits, 19–22
 - Procurement Fraud Handbook*, 19–22
 - Semiannual Report to the Congress*, 17–19, 30
- gifts, 52
- Gilead Sciences, 75
- government contract, 42
- government contractors, key issues for, 75–77
- government counsels, 3
- government enforcement, 124
- government procurement, 121–123
- guilty pleas, 58–59

H

- Halper* decision, 73
- Head of Contracting Activity, 52
- health care, 72–73
- Holder, Eric (Attorney General), 23
- hold order, 118, 141, 142
- horsetrading theory, 85
- Howard v. United States*, 56
- Hudson et al. v. United States*, 73

I

- Immigration and Customs Enforcement (ICE), 40
- impartiality, 115
- implied certification theory, 74
- incentive fees, 94
- incompletions, 98
- individual-to-company debarment, 38
- in-house counsel, 115
- Inspector General Act of 1978, 16
- Inspector Generals, 15–19, 27, 47, 102
- Integrated Medical Solutions LLC (IMS), 58
- intent, 70–71
 - to influence, 79

- Interagency Suspension and Debarment Committee (ISDC), 40, 47
- internal investigations, 116
- interviews, 109–111
- investigations, 101–112
 - control of, 107–108
 - corporate policies and procedures on, 116
 - cross-border issues in, 119–120
 - document collection and preservation, 108–109
 - format of investigation plan, 107
 - in-house counsel, 115
 - initial analysis, 105–106
 - internal, 116
 - interviews, 109–111
 - manual and practice tip, 101–112
 - matter intake, 104–105
 - memorializing, 112
 - outside counsel in, 106
 - planning and scoping, 106–107
 - remedies, 101
 - requests for cooperation in, 114
 - stakeholders in, 102–103

K

- Kasper, Neal, 59
- Kellog Brown & Root Inc. (KKR), 57–58
- Kennedy, John F., 59–60
- keywords, 119
- kickbacks
 - attempted, 54
 - as commercial bribery, 53
 - defined, 52
 - favorable treatments and, 52
 - in government contracting, 54
- knowledge, 67, 71–72, 76

L

- labor laws, 120
- Laguna Construction Company, Inc., 58–59
- lawyers. *See* attorneys
- Lincoln's Law. *See* False Claims Act (FCA)
- lobbying, 80
- local laws, 120
- Logistics Civil Augmentation Program (LOGCAP), 72

M

- Major Fraud Act of 1988, 63–66
- management-related fraud indicators, 25–26
- mandatory disclosure provision, 52
- Mandatory Disclosure Rule, 102–103
 - rationales for, 27
 - timely disclosure requirement, 28
- mandatory disclosures, 26–30, 48, 102, 123

Manta.com, 40
Martin J. Simko Construction, Inc. v. United States, 84
 material
 in civil FCA, 68
 nonprivileged, 116
 privileged, 116
 materiality, 73, 76, 77
 McDonnell, Bob (former Virginia governor), 57, 61
 McDonnell test, 63
McDonnell v. United States, 57
 media coverage, adverse, 114
 Medicaid, 71, 73
 Medicare, 71, 72, 73
 Military Departments, 3
Miller v. United States, 90
 Miscellaneous Receipts Act, 9
 Multiple Award Schedule (MAS), 21
MW Builders, Inc. v. United States, 87 n.210

N

National Aeronautics and Space Administration (NASA), 41, 43
 National Defense Authorization Act, 3
 Fiscal Year 2012, Section 841, 45
 Fiscal Year 2018, Section 1045, 80
 Fiscal Year 2018, Section 1612, 45–46
 Fiscal Year 2018, Section 847, 78–81
National Industrial Security Program Operating Manual, 100
 National Procurement Fraud Task Force, 28
 National Science Foundation (NSF), 41, 43
 Navy Acquisition Integrity Office, 5
 new drug administration, 75
 New York City Medical Laboratories, 73
 Ninth Circuit, 75
 nonconformances, 98
 nonconforming goods, rejection of, 95–96
 nonperformance of contract, 36
 nonprivileged material, 116
 Nonprocurement Common Rule, 35, 47
 notice of proposed debarment, 36
 notices of concern, 48

O

Oasis International Waters, Inc. v. United States, 71, 89, 90 n.241, 90 n.242, 91 n.246
O'Brien Gear & Machine Co. v. United States, 82
 Office of Federal Procurement Policy, 28
 Office of National Courts in the Commercial Litigation, 86
 Office of Special Investigations, 10

Office of the Chairman of the Joint Chiefs of Staff, 3
 Office of the Deputy General Counsel for Contractor Responsibility (SAF/GCR), 6–7
 Office of the Deputy General Counsel for Contractor Responsibility and Conflict Resolution, 6
 Office of the Inspector General of the Department of Defense, 4
 Office of the Secretary of Defense-level Defense Procurement and Acquisition Policy, 31
 Offices of Inspector Generals (OIGs), 15–19, 27, 47, 102
 official acts, 61, 62
 online resources
 DoD/NASA Procurement Fraud Working Group., 31–32
 Guidance Fraud Referrals website, 25–26
 Operation Freedom's Sentinel (Afghanistan), 31
 Operation Inherent Resolve (Iraq/Syria), 31
 outside counsel, 106, 115, 142

P

Parallel Proceedings Memo (DoJ), 22–25
 payment, 52
 payments, withholding of, 99–100
 personal participation, 79
 Physician Self-Referral (Stark) law, 72–73
 Popescu, Emil, 58
 post-government employment restrictions, 78–81
 18 U.S.C. § 207(a)(1) lifetime ban, 79
 18 U.S.C. § 207(a)(2) two-year ban, 79
 18 U.S.C. § 207(c) one-year ban, 80
 Procurement Integrity Act, 80–81
 Section 1045 of the National Defense Authorization Act (NDAA) for FY 2018, 80
 Section 847, National Defense Authorization Act of Fiscal Year 2008, 78–81
 price reduction, 94
 prime contract, 51, 52
 prime contractor employee, 53
 prime contractors, 53, 54, 56 n.53
 Principal Deputy Inspector General, 17
 privacy, 119
 privileged material, 116, 139
 proceedings, 61–62
 procurement fraud
 defense contractors, 65
 definitions of, 1–2, 14
 monetary impact of, 65
 stakeholders, 2
 U.S. government's response to, 2–3

Procurement Fraud Civil Remedies Act, 29
 Procurement Fraud Division, 5, 13
Procurement Fraud Handbook, 19–22
 Procurement Integrity Act, 18, 80–81, 94
 product quality report, adverse, 115
 product substitution, 65
 Professional Services Council, 64
 Program Fraud Civil Remedies Act, 64
Protec GMBH, Appeals of, 93
 public relations, 115, 140

Q

qualified bidders lists (QBLs), 99
 qualified manufacturers lists (QMLs), 99
 qualified products lists, 99
 quality assurance, 96–97
qui tam
 cases/procedure, 4, 11, 32, 46, 69, 76–77
 limitations, 69–70
 provisions, 66
 relators, 66, 72, 75

R

RDA Construction Corp. vs. United States, 90
 reformation of contracts, 94–95
 rejection of nonconforming goods, 95–96
 relators, 66, 72, 75
 remedies, 4–5
 administrative, 4–5
 categories, 4–5
 civil, 4, 101
 comprehensive remedies plans, 15
 contractual, 5, 101
 criminal, 4, 101
 Parallel Proceedings Memo, 24
 plans, 7–8, 14–15
 repeated content identification, 119
 reverse false claims provision, 68–69
 Rivera, Jose (contractor), 58

S

S&E Contractors v. United States, 85
 safety issues, 113
 Sarbanes-Oxley Act of 2002, 117
 search warrants, 137–140
 best practices, 137–140
 classified documents, 140
 crisis management, 113
 detaining employees, 138
 employees' rights, 138
 inventories, 139
 lead agent, 137–138
 notification of public relations
 department, 140

 obtaining and reviewing, 138
 preparation and planning, 137
 record of events, 139
 during the search, 137–140
 seizure of property, 139
 split samples, 140
 Second Circuit, 62
 Secretary of the Navy Instruction
 (SECNAV) 5430.92C, 14–15
 seizure of property, 139
Semiannual Report to the Congress (GSA's
 Office of Inspector General), 17–19, 30
 show cause letters, 48
 significant overpayments, 28, 29
 Sikorsky Support Services, Inc. (SSSI), 57
 Sixth Circuit, 70
 Small Business Administration (SBA), 41, 43
 space contractor watch list, 45–46
 split samples, 139–140
 Staff Judge Advocates, 13
 stakeholders, 2, 46–49
 in fraud investigation, 102–103
 remedies, 5
 Stark law, 72–73
 statutory exclusions, 44–46
 space contractor watch list, 45–46
 vendor vetting, 45
 Struble, Aaron (contractor), 58
 subcontract, 42, 52–53
 subcontractor employee, 53
 subcontractors, 53, 56 n.53
 subpoenas, 3, 114, 141–142. *See also* civil
 investigative demands (CIDs)
 substantial participation, 79
 suits, 61–62
 Supreme Court, 61–62, 67, 70, 73, 74, 75, 85
 Suspension and Debarment Officials
 (SDOs), 12, 33, 38, 39, 48, 102, 103
 suspensions, 12, 35–44, 101. *See also* debarments
 burden of proof for, 38–39
 decline in, 44
 defined, 35–44
 effectiveness of, 48
 as mini-disbarments, 38
 System for Award Management
 (SAM), 18, 36, 40–42
 systems analysis approach, 2

T

tax evasion, 36
 theft, 36, 62, 113
 Third Circuit, 62
Touby requests, 7

training, 121–133
 business ethics and awareness
 compliance, 124–133
 compliance risks, 124
 government customer interaction, 123–124
 government enforcement, 124
 government procurement, 121–133
 Truth in Negotiations Act (TINA), 72
 Tucker Act, 84
 Tuomey Healthcare System, 72–73
 typical meeting, 61–62

U

unilateral contract modification, 98
 United States Central Command, 45
 United States Court of Federal Claims,
 71, 81, 83–84, 86, 88, 90, 91
United States ex rel. Campie v.
Gilead Sciences, Inc., 75
United States ex rel. Drakeford v. Tuomey, 72–73
United States ex rel. Kietzman v. Bethany Circle of
King's Daughters of Madison, Indiana, Inc., 72
United States ex rel. Medrano v.
Diabetic Care RX, LLC, 78
United States ex rel. Patzer v. Sikorsky
Aircraft Corp. et al., 56–57
United States ex rel. Ruckh v.
CMC II, LLC et al., 74
United States ex rel. Scollick v. Narula, 77–78
United States ex rel. Searle v. DRS
C3 & Aviation Co., 72
United States ex rel. Watkins v. KBR, Inc., 72
United States Sentencing Commission
Guidelines Manual, 128–130
United States v. Acme Process Equipment Co., 55
United States v. Boutte, 65
United States v. Collins, 65
United States v. Conley, 62
United States v. Copeland, 55
United States v. Dynamics Research Corp., 56 n.54
United States v. Gamma Tech Industries, Inc., 56
United States v. Halper, 73
United States v. Kellogg Brown & Root, Inc., 57–58
United States v. Kiener, 56
United States v. Krizek, 71
United States v. Kruse, 56 n.53
United States v. McDonald et al., 57
United States v. Silver, 62

United States v. Spectrum, Inc., 73
United States v. Warning, 56 n.53
United States v. White, 66
Universal Health Services, Inc. v. United
States ex rel. Escobar, 74
 urban legends, 24
 U.S. Attorney Offices, 8
 U.S. Chamber of Commerce, 64
 U.S. Code
 18 U.S.C. § 201, 59
 18 U.S.C. § 207(a)(1) lifetime ban, 79
 18 U.S.C. § 207(a)(2) two-year ban, 79
 18 U.S.C. § 207(c) one-year ban, 80
 18 U.S.C. § 287, 67
 18 U.S.C. § 1001, 81
 18 U.S.C. § 1519, 142
 28 U.S.C. § 2514, 81–83, 85, 87, 88
 31 U.S.C. §§ 3729–3733, 66, 85
 31 U.S.C. § 3729, 68, 69
 31 U.S.C. § 3730, 69, 76
 31 U.S.C. § 3733, 70
 41 U.S.C. §§ 2012–2014, 94
 41 U.S.C. §§ 2101–2107, 80–81
 41 U.S.C. §§ 8701 ET SEQ. (2011), 51
 41 U.S.C. § 7103, 85
 Title 18 of, 26, 28

V

vendor vetting, 45
Veridyne Corp. v. United States, 87 n.210
 Veterans Affairs (VA), 41, 43

W

warranties, breach of, 92–93
 whistleblowers, 4
 bounties, 65
 civil remedies, 4
 False Claims Act action, 4, 23
 hotline calls, 131, 132
 internal reporters as, 106
qui tam provisions, 66
 reprisal rights, 104
 retaliation claim, 114
 White, Harry Michael, 66
 White, Tiffany, 59
 white collar crimes, 23
 withholding of payments, 99–100