GCR's Holistic Approach to Suspension, Debarment, & Fraud Remedies: An Insider's Look Into GCR Initiatives and Activities

Welcome fans of Fraud Facts to another edition jam-packed with fascinating articles on recent GCR initiatives, activities, and thought-provoking policy questions. Join GCR on its journey and read about:

- The current state of the ethical workplace and DoD's movement toward a values-based ethics program, where core values are inculcated within the culture so that personnel understand what is important to DoD and focus their actions on doing the right thing above all else;
- Major enhancements in the methods by which the Air Force is fighting fraud and the importance of relationship building in furthering this fight;
- The importance of eradicating poor performers from the government-contracting arena and efforts to funnel such poor performers to GCR's door;
- A policy piece exploring the question of whether it makes sense for debarments to terminate automatically without any consideration of the contractor's present responsibility;
- An overview of Air Force recent debarments; and
- Finally, three articles written by student law clerks highlighting their experiences and career goals.

We hope you enjoy reading this edition as much as we enjoyed writing it! GCR welcomes your thoughts, including new outreach initiatives you believe we should consider. Direct comments and proposed articles to the Editor-In-Chief at: Todd.Canni@pentagon.af.mil. Until next time ….

Workplace Ethics in Transition

By the Ethics Resource Center

Two years after the Ethics Resource Center (ERC) showed a rebound in ethical workplace behavior, the 2011 National Business Ethics Survey® (NBES) shows a bifurcated picture and a pattern unlike any other year. On the positive side, the data reveal historically low levels of current misconduct in the American workplace and record high levels of employee reporting.

- The percentage of employees who witnessed misconduct at work fell to a new low of 45 percent. That compares to 49 percent in 2009 and is well down from the record high of 55 percent in 2007.
- Those who reported the bad behavior they saw reached a record high of 65 percent, up from 63 percent two years earlier and 12 percentage points higher than the record low of 53 percent in 2005.

But clouding this good news are ominous warning signs of a potentially significant ethics decline ahead. And, the negative indicators predominate:

The Ethical Workplace

- Retaliation against employee whistleblowers rose sharply. More than one in five employees (22 percent) who reported misconduct say they experienced some form of retaliation in return. That compares to 12 percent who experienced retaliation in 2007 and 15 percent in 2009.
- The percentage of employees who perceived pressure to compromise standards in order to do their jobs climbed five points to 13 percent, just shy of the all-time high of 14 percent in 2000.
- The share of companies with weak ethics cultures also climbed to near record levels at 42 percent, up from 35 percent two years ago.

The co-existence of widespread retaliation and pressure with historically low misconduct and high reporting is unlike any previous pattern. Two influences stood out in the unusual shift in trends: the economy and the unique experiences of those actively using social networking at work.

For many Americans, the economy in 2011 seems only slightly better than during the recession. Growth is sluggish, the unemployment rate remains stubbornly high, and fear of a second recession fosters continued anxiety. NBES continues to show that companies behave differently during economic difficulties. The decisions and behaviors of their leaders are perceived by employees as a heightened commitment to ethics. As a result, employees adopt a higher standard of conduct for themselves.

- About one-third (34 percent) of employees say management now watches them more closely.
- More than four in 10 employees (42 percent) say their company has increased efforts to raise awareness about ethics.
- 30 percent of employees agree that bad actors in their company are laying low because of fears about the recession.

Workplace Ethics in Transition (*continued)*

Post-recession conduct among employees is remarkably similar to their behavior during the recession. This phenomenon is a significant factor in the historically low rates of misconduct and high rates of reporting. ***That matches historical data, which show that ethical conduct improves when the economy cools.***

As the economy gets better – and companies and employees become more optimistic about their financial futures – ***it seems likely that misconduct will rise and reporting will drop***, mirroring the growth in pressure and retaliation that have already taken place and conforming to historic patterns.

The other key element driving the 2011 NBES results is the rise in influence of active social networkers. A surprising and worrisome divide exists within the workplace between employees who spend substantial time on social networks and those who do not. Active social networkers report far more negative experiences in their workplaces. As a group, they are much more likely to experience pressure to compromise ethics standards and to experience retaliation for reporting misconduct than co-workers who are less involved with social networking.

- By 32 percentage points, active social networkers are much more likely to feel pressure than less active networkers and non-networkers.
- Most of the active networkers who reported misconduct say they experienced retaliation as a result: 56 percent compared to just 18 percent of less active social networkers and non-networkers.

ERC is America's oldest nonprofit dedicated to independent research and the advancement of high ethical standards and practices in public and private institutions.

Leading by Example:
Implementing a Values-Based Ethics Program at DoD

By Patricia Harned, President, Ethics Resource Center
and
Steve Cohen, President, EthicsOne

Does an organization with a robust set of rules and a hierarchical reporting structure *really* need a values-based program of education, awareness – and leadership? The answer is "yes," and DoD is setting a new standard among executive branch agencies in recognizing this need. GCR is leading the effort for DoD to adopt its own values-based ethics program. This article summarizes the performance phase of this effort.

First - a little context. DoD is arguably the primary model of a rules-based organization. It manages the largest workforce in the world with a set of explicit rules, long-standing traditions, commitment to service, and a chain of command in which every individual knows where they stand. It is impossible not to be impressed with how well it runs. Yet, DoD is also subject to the same reality that all organizations face; rules have limitations.

The world of today is a rapidly changing environment, where success is linked to how well employees can make good decisions in a variety of contexts. Regulations can't address every situation an employee faces, so a set of guiding principles are needed to help address the circumstances when the rules aren't clear. This is the fundamental argument for a values-based ethics program.

Best-in-class values-based ethics programs have several distinct features. They are based on a set of core values that are not only communicated from the top down, but they are integrated into everyday decisions throughout the organization. Best-in-class programs also train all employees on ethical decision-making every year. They focus on building an ethical culture where employees are encouraged to raise concerns, and they are rewarded for upholding standards of integrity.

Recognizing this need, DoD selected EthicsOne and the Ethics Resource Center to perform contract # HQ0034-11-C-0062. The project constitutes Phase II of the values-based ethics program development, and has a Performance Work Statement, which requires the evaluation of the Phase I survey of employees on DoD's current ethical culture, a comparison of the survey results with benchmarks and other research findings, recommendations to transition DoD to a values-based program, and the development of training to support and communicate a set of core values.

Additionally, the contract team is developing materials for employee training, based directly on success in programs previously created for defense industry contractors. The learning experience will be based on realistic cases designed to engage participants in a discussion of how the values (in addition to relevant rules) can be applied to the issues raised in the case. The recommendations and training material will be delivered to DoD this Spring.

Will the introduction of values training and awareness have a lasting impact on people's behavior and decision-making at DoD? Many organizations have been successful in adapting to the need for a values-based cultural change; it results in meaningful and measurable benefits. Already DoD has shown strong commitment to this transition, so we believe the answer will be "yes."

Vision and Relationship Building: Core Elements to Effective Fraud Fighting

By David B. Robbins (Asst. Dep. General Counsel / Dir., Procurement Fraud Remedies)

Procurement fraud remedies programs, as envisioned by DoD Instruction 7050.05 and Air Force Instruction 51-1101, are the "better business bureaus" of government contracting. These programs focus not just on buzzwords of "fraud, waste and abuse" but also on contractor performance issues and other matters relating to ethics and integrity, generally. These programs exist to make sure "wrongs are righted," the government is made whole and, if necessary, misconduct is punished appropriately. These programs exist to avoid a silo mentality and, at least in part, to make sure that the unyielding (and admirable) focus on getting goods under contract and to the war fighter does not have the collateral effect of saddling more programs with the same old problems that reduce already scarce procurement funds.

We simply cannot afford to do that. Nor can we afford to have our program folks stop programs and slip schedules to fully ferret out every fact that might be an indicator of procurement fraud. This is where procurement fraud remedies programs can help.

So how do procurement fraud remedies programs accomplish their goals? They are not designed with any formal command authority. (For example, as the person responsible for the Air Force program, I do not have the ability to "order" anyone to take any remedy.) So how do these programs achieve the required ends of considering all appropriate remedies while deterring misconduct? The two-word answer is "vision" and "relationships."

Vision

Keeping in mind that there is no formal command authority provided to procurement fraud remedies programs, the ability of any of these programs to effect change can be limited unless all stakeholders see the benefits of the program. That can be difficult to do. To oversimplify interest groups' perspectives: (1) contracting may be focused on getting goods under contract and to the end users as soon as possible; (2) end users and program management are intensely focused on production schedule; (3) law enforcement may be focused on criminal convictions or otherwise supporting Department of Justice punishment efforts; and (4) some agency suspension and debarment officials may be focused on suspending and debarring above all else. Given the potential for divergent interests, the procurement fraud remedies program must have a vision that can attract joint stakeholder support. For example, the Air Force program's vision is to push contractual and administrative remedies ever earlier with a focus on achieving cost recovery (where appropriate) for affected programs before the funds expire.

We also believe that bringing in all relevant stakeholders and leveraging their abilities as force multipliers enables rapid reactions to procurement fraud indicators to protect the Air Force's broad interests. This includes maintaining production schedule and preserving all possible remedies. For an illustration of this approach, read the next article on the recent Memorandum of Understanding.

Relationships

It is impossible to "sell" a vision without first establishing relationships with the appropriate stakeholder communities. Traction only comes from trust. An important way to build trust is to work together on sample cases, in a coordinated fashion, where each stakeholder can achieve their ends while doing the right thing not just for that stakeholder community, but for DoD as a whole. The Air Force's myriad Procurement Fraud Working Groups, existing at all levels of our organization, are also excellent platforms for building trust by discussing best practices and pushing past sticking points and working through them as a group. It is the Air Force's experience that the positive experiences generated from sample cases and working groups multiply and relationships based upon trust encourage communication.

There will occasionally be times when stakeholder groups must proceed in a manner that others may not agree with, but if a productive, trust-based relationship exists, the Air Force's experience is that the relationships will survive, strengthened.

Restructuring the Fraud Mission for the Future

By David B. Robbins (Asst. Dep. General Counsel / Dir., Procurement Fraud Remedies)

On December 9, 2011, the Air Force fundamentally reorganized its government-leading procurement fraud remedies program to meet the challenges of the "Era of Austerity." On that day, Maj. Gen. Wendy Masiello (SAF/AQC), Mr. Steven Shaw (SAF/GCR), and Brig. Gen. Kevin Jacobsen (AFOSI) signed an historic Memorandum of Understanding (MOU) that aligned the interests of all three organizations in the Air Force's procurement fraud mission. These senior leaders agreed that their organizations would work together in real time to uncover procurement fraud and misconduct, share information, seek prosecution when warranted and, in all appropriate instances, make the affected programs whole early, within our fiscal law cycle. The MOU is available here: (http://www.safgc.hq.af.mil/shared/media/document/AFD-120120-010.pdf)

Although the Air Force has a consistently strong program—and one that is recognized as a leader in the field—this MOU is a "game changer." For the first time, the Air Force has lined up behind the principle that we seek to make our programs whole, and we will not accept unnecessary delays in doing so. We can have no other response to allegations of procurement fraud and misconduct in the "Era of Austerity" where operations and maintenance funds are scarce at best and seeking new funds to remedy past misconduct will be difficult. We will, of course, continue to press ahead with administrative remedies, criminal convictions, and civil judgments whenever warranted. But a primary goal will be making sure the Air Force gets what it paid for.

The MOU is the first of its kind in DoD. It has received national and international media attention, and has led multiple federal agencies to request information about how to construct their own document. More importantly, the MOU provides a platform for each stakeholder community – acquisition/contracting, law enforcement, and acquisition fraud counsel – to spread through the Air Force the message that in this era of reduced resources making the Air Force whole is a primary concern in the procurement fraud mission. The "MOU Team" of Col John Gilmour (SAF/AQC), Lt Col Camille Nichols (SAF/AQC), Mr. Cornelius King (AFOSI), Mr. David Harper (AFOSI), and Mr. David Robbins (SAF/GCR), with support from others on their respective staffs, met regularly over nine months, deconflicted each organization's policies and procedures, and mapped out the way the Air Force procurement fraud mission should be conducted. Although we all fervently hope for the day that all of our contractors conduct their business the right way, we are ever vigilant and ready to deal in an integrated fashion, using every appropriate tool at our disposal, with the minority of our contractor base who seek to defraud the Air Force.

A Call to Contracting Officers and Program Counsel: Bring Us Your Unreliable, Ineffective, and Poor Performing Contractors

By Todd J. Canni (Director, Suspension & Debarment Operations)

Have you been on the losing end of a contract with a poor performer? The contract calls out exactly what you need and the due date, and, despite promoting their ability to get the job done, they fail to deliver. You then afford them a second or perhaps a third chance to cure their deficiencies; they still fail to perform. After your procurement is delayed significantly and it becomes exceedingly clear that performance is highly unlikely, you finally say enough is enough and terminate the contract for default/cause (for ease, "terminated" or "terminate"). Does this sound familiar? If so, well then we have something that just may interest you. Starting retroactively and for an unlimited period of time, for every contract you terminate, send them our way and you have GCR's promise to evaluate the contractor's present responsibility under FAR Subpart 9.4 and to consider whether debarment is appropriate.

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You have the opportunity to ensure a contractor that you terminated is evaluated for government-wide exclusion from contracting. This is an opportunity to save your Government, your agency, yourself and your fellow colleagues from having to work with the poor performer again and again. Listen to poor excuses, no more. You have the opportunity to save taxpayers bundles of money. At a time when procurement dollars are scarce and programs are understaffed, you cannot miss out on this opportunity.

And at what cost to you, you may ask? Zero, nada, zilch. You may ask, why would GCR do this for us? Well, as much as we enjoy our work, we also get paid to carry out this mission of protecting the government from non-responsible contractors. In addition to ferreting out fraudsters, we also take poor performers seriously. Although often relegated to the backseat in our collective efforts to stop fraud, poor performers result in waste and abuse and pose a major problem to the effective and efficient operation of our procurement system. They delay our receipt of much-needed goods and services, sometimes supplies destined for the war fighter.

Hopefully, you agree. Now is the time for action. Next time you terminate one of these contractors, try us on for size. ***Who you gonna call? GCR!*** Just send us a copy of the termination decision to start. In fact, send us past termination decisions from the last few years and we'll give them a review. If we believe action is appropriate under FAR Subpart 9.4, which governs our decision-making, you'll hear from us.

With every comedic advertisement, or failed attempt, as is the case here, there comes ***FINE PRINT.*** Not only should you want to send us these poor performers for consideration, but, more importantly, AFFARS 5309.406-3 requires you to do so. Contracting officials MUST send us a copy of all termination for default/cause decisions, non-responsibility decisions, indictments, convictions, civil judgments, and other information reflecting negatively on a contractor's present responsibility. We also want to learn about significant performance failures that did not result in termination for one reason or another. Additionally, DoD IG Report No. D-2011-083 (July 2011) found that contracting officers are not referring poor performers and, thus, concluded that poor performers may still be receiving contracts. The importance of your referrals cannot be overstated. We're not here to second guess your decisions but rather are here to protect the government's interests and, to do so, need this information, so that we can consider whether debarment is appropriate. We encourage all contracting personnel and their program counsel to review the AFFARS provision identified above and to make sure they are referring us all poor performers. We look forward to working with you.

Policy Corner

As the Editor-In Chief, I wanted to introduce a new forum for policy discussions concerning any issue related to suspension and debarment and procurement fraud. When appropriate, Fraud Facts will introduce policy issues for reader consideration, thought, and input. GCR welcomes reader input and suggestions for the next edition of Fraud Facts.

Should Debarments Terminate Automatically?

By Todd J. Canni (Director, Suspension & Debarment Operations)

In this edition, the feature policy issue concerns the automatic termination of a debarment based solely upon a set period of time as opposed to any finding of present responsibility. Under FAR Subpart 9.4, debarments run for a fixed period, at the conclusion of which the debarment expires automatically. When you give thought to the purpose underlying debarment, this approach seems to be at odds.

A contractor is debarred only after an agency Suspension and Debarment Official (SDO) determines that the contractor is not presently responsible. Such a finding may be based on a variety of improper conduct, including criminal conduct, poor performance under a government contract, or a lack of ethics, integrity, and honesty. In many instances, the improper conduct occurred because of core ethical deficiencies in an individual or company. Given this, it is not surprising that the government would not want to do business with that contractor.

Our current system operates under the assumption that after some fixed period of time, which FAR 9.406-4 provides should generally not exceed three years, the contractor is now magically presently responsible, no longer presents a threat to the government's interests, and can be trusted to do business fairly and honestly. In few instances, does anything improve solely with the passage of time and without any effort; wine is naturally an exception to this general rule.

Where a person has an ailment that can only be cured through treatment, the medical profession does not advise the patient to go home and wait three years. To the contrary, without treatment, the ailment is likely to get worse and definitely not improve. Like an individual suffering from an ailment, a contractor lacking ethics and integrity is not going to become ethical purely as a result of the passage of time or because they have continued conducting business as a commercial contractor without incident. (Although an argument could be made that issue-free performance on commercial contracts is indicative of responsibility). It requires education in what is right and what is wrong and even legal compliance training from a government contracts perspective. It also often requires the establishment and implementation of policies and controls so that when issues present themselves, policies are in place that help the contractor navigate through those tough issues. Given this reality, why is our current system founded on the assumption that time and perhaps commercial contracting, alone, will cure all?

The purpose of this policy piece is to raise the argument that, in a perfect system, one free of resource constraints, debarment would be for an indefinite period until the contractor can demonstrate its present responsibility. Under such a system, there would be no presumption as to when a contractor will be ready to be declared eligible, nor would there be any presumption that the contractor will ever be responsible. Rather, after being debarred, the contractor may choose to not pursue government contracts anymore and its debarment would remain in effect. Alternatively, it could decide that they value doing business with the government and want to make the changes necessary to be responsible. In the latter case, the system should encourage the contractor to improve quickly and then return to the agency SDO and demonstrate its present responsibility.

Let us know what you think? Todd.Canni@pentagon.af.mil

Introducing Our SCEPs

The Student Career Experience Program (SCEP) affords students the opportunity to gain valuable and practical work experiences within the federal Government by participating in a paid internship, on a full-time or part-time basis, for a federal agency while they pursue their educational studies. Ideally, at the conclusion of the internship, the student will have developed a passion and interest in working for the federal Government and pursue post-graduation employment with the Government. Over the years, GCR has had many students participate in the SCEP program. Below is the story of three.

Christina Patton-Black

Attorney, Health and Human Services, Office of General Counsel

I had the distinct pleasure of working with GCR from the Fall of 2008 to the Spring of 2011. At the time I joined GCR, I was a second-year law student at George Mason University School of Law, and while I was enthusiastic to work in the public service sector, I could not have anticipated the opportunities, both educationally and professionally, this position with the Air Force would provide me.

GCR is responsible for exercising the Air Force's suspension and debarment authority. When a contractor is alleged to have engaged in conduct reflecting a lack of business integrity, GCR must consider the facts and decide whether the contractor should be prohibited from receiving new government contracts. As a law clerk, I was afforded the opportunity to begin developing the legal skills that will serve me well into my professional career. Initially, I supported the Air Force mission by working closely with GCR attorneys to review files, assemble evidence, and draft legal memoranda. As my research and writing skills improved, as well as my ability to balance the many issues that guide GCR's decision-making, I was quickly given the responsibility of managing cases under close attorney supervision. As a result, my responsibilities expanded to include developing referrals for administrative action from law enforcement, fraud attorneys, and investigators; drafting initial versions of actions; participating in contractor presentations; reviewing contractor submissions; and recommending appropriate administrative action.

I am thrilled to have played a part in the sensitive and often highly visible nature of GCR's role in protecting the interests of the United States. During my time with GCR, I became passionate about the Air Force mission and my responsibilities within the office. The substantive nature of the work and the opportunity I was afforded to work with Air Force law professionals at GCR was truly an invaluable experience, and one which opened doors for me that otherwise would not have opened. I graduated from law school in December 2010, and while I was sad to leave GCR, I am thrilled to continue supporting the Federal Government as an Attorney Advisor at the Health and Human Services, Office of General Counsel.

SCEPs (continued)

Joseph Johnson

University of Maryland University College
(Masters Program, Criminal Justice)

I quickly realized after joining GCR in June 2010 that I had become a part of an exceptional team that is tasked with a unique and vital mission: protecting the Government's interests. While I am a slight departure from the typical SCEPs at GCR, given I am a Criminal Justice Master's student and not a law student, the experience I have gained thus far has been tremendous towards my career development, generally speaking, and has exposed me to the legal-arena. Each day, I have the pleasure of working closely with experienced GCR attorneys in preparing suspension and debarment actions, coordinating procurement fraud remedies, and encouraging contractor ethics. This is truly an experience where hard-work and diligence produce tangible and meaningful results.

In addition to sponging the minds of GCR attorneys, my day-to-day tasks often involve direct interaction with Air Force fraud counsel, federal investigators, and contracting personnel (under the supervision of GCR attorneys). This supervised, yet wide-ranging, exposure to the Air Force and fraud-fighting stakeholders has provided me with a knowledge-base that has far exceeded my expectations.

After graduation, I hope to continue to serve in the public-sector as a special agent and to protect the Government's interests in that role.

Alix Schroeder

The George Washington University Law School
(JD Candidate)

I joined GCR the summer after my first year of law school. I am very excited to be a member of the team. At GCR, I have had the opportunity to be hands-on in every aspect of the case from writing initial drafts of proposed debarment, suspension, and debarment decisions to participating in contractor meetings to conducting legal research. I have also had the opportunity to work on the fraud remedies aspect of GCR's mission and, among other responsibilities, am assisting in developing the Air Force's Procurement Fraud Remedies Manual to give Air Force wide guidance on fraud remedies.

My work at GCR also has intersected with my school work. At GW, I have had the opportunity to write papers discussing different suspension and debarment programs and efforts to combat corruption. In addition, the variety of government contracts issues we run across at GCR helps me to understand how topics taught in my government contracts classes intersect with each other.

I graduated from college with a major in political science concentrating in international relations and a minor in human rights and architectural studies. After graduating from law school, I hope to combine my undergraduate and graduate training and work in foreign aid contracting.

Some Recent Air Force Debarments

(Non-final actions are not listed (i.e. proposed debarments and suspensions))

Allied Industrial Distributors: The AF debarred Donald Clyde, and Allied Industrial Distributors a/k/a Allied Pressure Washers d/b/a Allied Manufacturing based on their failure to perform an AF contract ultimately terminated for cause.

Amodu: The Air Force debarred Kudus Amodu based on his conviction for aircraft parts fraud.

Central States Roofing: The Air Force debarred Central States Roofing Company, Inc. and William Hauschildt for providing the Air Force with fraudulent warranties under an Air Force contract.

Elguezabal: The Air Force debarred Domingo J. Elguezabal, a former employee of an Air Force contractor, for knowingly ordering the installation of non-BAA (Buy American Act) compliant materials into a government project against his employer's direction.

Federal Contracting Services: The Air Force debarred Federal Contracting Services, Brian Frost, and Brian Shaul based on their poor performance of an Air Force contract ultimately terminated for default.

Fire and Security, Inc.: The Air Force debarred Fire and Security Inc. a/k/a FSI, Kennedy Smith and Jeffrey Beavin for poor performance of an Air Force contract ultimately terminated for default.

Time Mischarging Cases: The Air Force debarred William Kenneth Barr, Frank Schaukowitch, Steven Foster, and Tommy Williams, (contractor employees) for time mischarging.

MJW Medical Solutions: The Air Force debarred Michael J. Williams, Sr. and MJW Medical Solutions, Inc. for improper conduct that created the appearance of impropriety, including the receipt and improper handling of non-public information concerning an Air Force procurement.

Moe's Vending: The Air Force debarred Moe's Vending, Keith Trammell Sr., and Joseph E. Trammell for misconduct that included, among other things, possession of illegal controlled substances on Government property while servicing vending machines and its subsequent failure to properly disclose the incident as required by the company's licensing agreement with the Ohio Center for the Blind, which regulates vending-machine contractors.

Precision Gas Instruments: The Air Force debarred Precision Gas Instruments, Inc. and Ronald Arthur Berg for poor performance on an Air Force contract ultimately terminated for default.

Song: The Air Force debarred Hui-Kuk Song a/k/a Hee-Koo Song (South Korea) based on his criminal conviction for bribery.

Sorvik: The Air Force debarred Hector Sorvik a/k/a Hector Arias based on his conviction for aircraft parts fraud.

(These are short, high level summaries of the debarment decisions. To read the actual decisions, visit the GCR website).

GCR Presentations & Outreach

- **December, Wright-Patterson AFB:** GCR visited WPAFB and provided extensive hands on case-based suspension and debarment training to members of the JAF Legal Office;
- **January, Wright Patterson AFB:** GCR visited WPAFB to bring the proactive procurement fraud remedies message and approach to AFMC contracting, AFOSI, and fraud counsel.
- **February, Wright-Patterson AFB**: GCR visited WPAFB to assist with counterfeit microelectronics coordination, assist with working large civil fraud cases, and to bring proactive procurement fraud remedies approach to ASC contracting.
- **March, Glynco, GA:** GCR provided suspension and debarment and fraud training at FLETC.
- **March, Annapolis, MD:** GCR participated in the ABA Public Contract Law Conference, Mandatory Disclosure panel.
- **March, FL:** GCR will be attending and participating in the DoD PFWG Annual Training Seminar, which is designed to enhance stakeholder relationships DoD-wide while discussing issues of importance to the community as well as new, innovative ways to fight procurement fraud.

- **April, Washington, DC:** GCR and GSA are sponsoring an Industry Day presentation to provide industry with information on the suspension and debarment process as well as information on ethics programs that mitigate against the occurrence of improper conduct.
- **April, London, England:** GCR will give a presentation on U.S. perspectives on international anti-corruption issues in the defense industry.
- **May, Dayton, OH:** GCR will participate in Corporate Council Day and moderate a fraud panel.
- **May, Orlando, FL:** GCR will participate on an SDO Panel at a DoD Procurement Conference.
- **June, Washington, DC:** GCR will moderate a panel of CEOs at the Defense Industry Initiative Best Practices Forum.

Meet the GCR Team

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The views and opinions of the authors expressed herein do not necessarily state or reflect the official policy or position of the Department of the Air Force, Department of Defense or the United States Government.

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