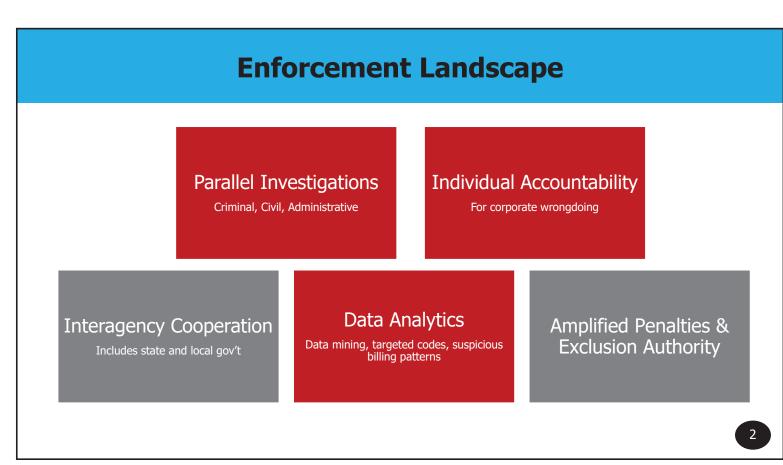
Enforcement Trends

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COVID-19 Funding

- The COVID-19 pandemic has resulted in legislative acts involving trillions of dollars in funding to be used to help address various issues brought on by the pandemic.
 - Families First Coronavirus Response Act
 - CARES Act
 - Paycheck Protection Program and Healthcare Enhancement Act
 - Consolidated Appropriations Act
- The COVID-19 pandemic has also impacted the healthcare industry beyond the financial funding.

COVID-19 Enforcement

- The DOJ is focused on detecting and prosecuting fraud related to the COVID-19 pandemic funding sources and activities.
 - "Coronavirus-related wrongdoing will continue to be a DOJ priority for the foreseeable future."
 - The DOJ "will make it a priority to use the False Claims Act to combat fraud in the Paycheck Protection Program" and "other assistance programs created by the CARES Act."
 - The DOJ notes that "To anyone thinking of using the global pandemic as an opportunity to scam and steal from hardworking Americans, my advice is simple don't." "No matter where you are or who you are, we will find you and prosecute you to the fullest extent of the law."

COVID-19 Enforcement

- Potential Issues:
 - False representation on funding eligibility
 - Misuse of funds
 - False certification on loan forgiveness
- The CARES Act includes certain enforcement oversight.
 - Pandemic Response Accountability Committee to provide oversight of the funds made available under the CARES Act.

COVID-19 Enforcement

- Some COVID-19 enforcement actions include:
 - Misappropriation of funds through inappropriate or inflated expenses
 - Misappropriation of funds through shell companies
 - Selling and promoting fake and unlawful cures or treatments
 - Kickbacks for personal protective equipment; fake PPE
 - Making false statements to federally insured banks to influence those banks to approve a PPP loan

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