<u>"#\$%&'!\$(!)\$*\$#!+!,(-*.!/*.0#!1.*230!4-\$0</u>!

<u>"#\$%&'!\$(!)\$*\$#!+!,(-*.!/*.0#!1.*230!4-\$0</u>!

CONSTANTINE

WHISTLEBLOWER PRACTICE

-.*23:!

#.#-\$&('2-!3#*'0M!

=@=:@<<!\$(!=@=:@=<!20!E%2.\$9!(C!*!-.*00!b!C#.('9:!

H*9#&:! **11.** 4 '9!H#&O('!-('N2-\$#7!(C!*!N2(.*\$2('!(C!\$B20!O#-\$2('A!2'!*772\$2('!\$(!*'9!C2'#OA!H#'*.\$2#O!(&!O#'\$#'-#O 23H(0#7!89!.*DA!0B*..!8#!&#P%2!\$(!3*K#!�\$2\$%\$2('!\$(!\$B#!C#7#&*.!*'7!0\$*\$#!E(N#&'3#'\$0A!2'!*'!*3(%'\$! *\$!.#*0\$!#P%*.!\$(!\$B*\$!%'.*DC%..9!H*27!\$(!(&!89!\$B#!H#&O('A!*'7!0B*..!8#!&#P%!\$(!î%&0#!\$B#! &#*0('*8.#!-(0\$0!*\$\$&28%\$*8.#!\$(!\$B#!2'N#0\$2E*\$2('!*'7!H&(0#-%\$2('!H%&0%*'\$!\$(!0#-\$2('0!=@=:@<<!\$(! =@=:@=<:!4..!(C!O%-B!�\$2\$%\$2('!OB*..!8#!H*27!*'7!7#H(O2\$#7!\$(!\$B#!-H\$!(C!\$B#!GQS!O#*.\$BT#\$!/&*%7! "#238%&0#3#'\$!/%'7GA!DB2-B!20!B#Y!#0\$*8.20B#7!2'!\$B#!0\$*\$#!\$&#*0%&9:!Q('#90!2'!\$B#!QS!O#*.\$BT#\$! C&*%7!î%&O#3#'\$!C%'7!OB*..!8#!72N27#7!*'7!*HH&(H&2*\$#7!\$(!\$B#!C#7#&*.!E(N#&'3#'\$!*'7!*C#-\$#7!O\$*\$#! *E#'-2#0!2'!(&7#&!\$(!&#C%'7!3('#90!C*.0#.9!(8\$*2'#7!C&(3!\$B#!C#7#&*.!*'7!O\$*\$#!E(N#&'3#'\$0:!4..!(C!O%-B! - (0\$!î%&0#3#'\$0!*\$\$&28%\$*8.#!\$(!\$B#!2'N#0\$2E*\$2('!*'7!H&(0#-%\$2('!0B*..!8#!H*27!*'7!7#H(02\$#7!\$(!\$B#! -H\$!(C!\$B#!GQS!O#*.\$BT#\$!/&*%7!X&(O#-%\$2('!"#N(.N2'E!/%'7GA!DB2-B!20!B#Y!#0\$*8.20B#7!?'!\$B#!O\$*\$#! \$&#*0%&9:!Q('#90!2'!\$B#!QS!O#*.\$BT#\$!C&*%7!H&(0#-%\$2('!&#N(.N2'E!C%'7!3*9!8#!*HH&(H&2*\$#7!\$(!\$B#! *\$\$(&'#9!E#'#&*.A!(&!\$(!*'9!H&(O#-%2'E!(&!-2&-%2\$!*\$\$(&'#9!DB(!B*0!0%--#000%..9!H&(O#-%\$#7!*'!*-\$2('!0(&! *!N2(.*\$2('!(C!O#-\$2('O!=@=:@<<!\$(!=@=:@=<!*'7!8##'!*D*&7#7!0%-B!-(O\$O!(C!H&(O#-%\$2('A!2'!(&7#&!\$(! 7#C&*9!\$B#!-(0\$0!(C!\$B#!*\$\$(&'#9!E#'#&*.!*'7!*'9!0%-B!H&(0#-%\$2'E!(&!-2&-%2\$!*\$\$(&'#9!2'!-(''#-\$2(''!D2\$B! \$B#2&!7%\$2#0!H&(N27#7!89!0#-\$2('0!=@=:@<<!\$(!=@=:@=<:!T(!3('#90!0B*..!8#!H*27!2'\$(!\$B#!QS!O#*.\$BT#\$! C&*%7!H&(\$#-\$2('!&#N(.N2'E!C%'7!H%&O%*'\$!\$(!\$B20!0%80#-\$2('!%'.#00!\$B#!*\$\$(&'#9!E#'#&*.!(&!*HH&(H&2*\$#! H&(O#-%2'E!(&!-2&-%2\$!*\$\$(&'#9!0B*..!B*N#!-(33#'-#7!*!H&(O#-%2('!H%&O%*'\$!\$(!\$B20!0#-\$2('A!*'7!\$B#! - (%&\$!C2'70!2'!2\$0!720-&#\$2('!\$B*\$!H*93#'\$!(C!*\$\$(&'#90!!C##0!*'7!2'N#0\$2E*\$2N#!-(0\$0!20!*HH&(H&2*\$#!%'7#&!*..! \$B#!-2&-% 3 0\$* ' -#0A!* ' 7!\$B#!*\$\$ (& ' #9!E# ' #& *.!* ' 7!H& (0# - %\$2 ' E! (&! -2& - %2\$!*\$\$ (& ' #9!OB *..!H& (N#!\$ (!\$B#!- (%&\$! \$B(0#!#IH#'0#0!DB2-B!D#&#!&#*0('*8.#!*'7!'#-#00*&9!\$(!\$B#!2'N#0\$2E*\$2('!*'7!H&(0#-%\$2('!(C!0%-B!-*0#A! * '7!\$B#!-(%&\$!*HH&(N#0!0%-B!#1H#'0#0!*0!8#2'E!&#*0('*8.#!*'7!'#-#00*&9:!4'9!3('#90!*2'2'E!2'! \$B#!QS!O#*.\$BT#\$!C&*%7!î%&0#3#'\$!C%'7!*C\$#&!72N202('!*'7!*HH&(H&2*\$2('!\$(!\$B#!C#7#&*.!E(N#&'3#'\$! * '7!*0C#-\$#7!0\$*\$#1*E#'-2#0!0B*..!8#!%0#7!\$(!2'-&#*0#!QS!O#*.\$BT#\$!H&(N27#&!î%&0#3#'\$!%'\$2.!2\$!20!*\$! .#*0\$!('#!B%'7!H#&-#'\$!(C!\$B#!Q#72-*&#!H&(N27#&!î%&0#3#'\$!&*\$#!C(&!-(3H*&*8.#!0#&N2-#0:!UB#!

(3) 4!-(%&0#!(C!-('7%-\$!2'N(.N2'E!(\$B#&!C*.0#!-.*230!0%832\$\$#7!\$(!\$B20!(&!*'9!(\$B#&!B#*.\$B!-*&#

0\$* 3 H#7A!\$9H#D&2\$\$#'!(&!02 3 2.*&!02E'*\$%&#!('!\$B#!-.*2 3 !C(&!B#*.\$B!-*&#!H*9 3 #'\$M! (2) 4!-.*23!C(&!*!B#*.\$B!-*&#!H*93#'\$!0%832\$\$#7!89!3#*'0!(C!-(3H%\$#&!82..2'E!\$*H#0!(&!(\$B#&

K'(D.#7E#!3*9!2'-.%7#!8%\$!0B*..!'(\$!8#!.232\$#7!\$(!\$B#!C(..(D2'EF! (1) 4!-.*23!C(&!*!B#*.\$B!-*&#!H*93#'\$!0%832\$\$#7!D2\$B!\$B#!B#*.\$B!-*&#!H&(N27#&LO!*-\$%*.A!C*-O232.#A

10.`'!*!H&(0#-%\$2('!H%&0%*'\$!\$(!0%80#-\$2('!=!(C!\$B20!0#-\$2('A!-2&-%30\$*'\$2*.!#N27#'-#!3*9!8# H&#O# '\$#7!\$(!7#3('0&*\$#!\$B*\$!*!C*.0#!0\$*\$#3# '\$!(&!-.*23!D*0!K'(D2'E.9!3*7#:!)%-B!#N27#'-#!(C!

9. Z*-B!0#H*&*\$#!C*.0#!0\$*\$#3#'\$!(&!C*.0#!&#H�#'\$*\$2('!(C!*!3*\$#&2*.IC*-\$!H&(0-&28#7!89!0%80#-\$2('!= (C!\$B20!0#-\$2('!(&!*-\$!H&(0-&28#7!89!0%80#-\$2('!;!(&!Y!(C!\$B20!0#-\$2('!0B*..!-('0\$2\$%\$#!*!0#H*&*\$#!(CC#'0#! * '7!*!O#H*&*\$#!N2(.*\$2('!(C!\$B20!O#-\$2('A!DB#\$B#&!(&!'(\$!3*7#!*\$!\$B#!O*3#!(&!720C#&#'\$!\$23#OA!*O!H*&\$!(C!\$B#! 0*3#!(&!O#H*&*\$#!#H2O(7#OA!*O!H*&\$!(C!\$B#!O*3#!O-B#3#!(&!-(%&O#!(C!-('7%-\$A!(&!*O!H*&\$!(C!\$B#!O*3#!

(80\$&%-\$A! 3 20.#*7A! (&!7#.*9!\$B#!-(3 3 %'2-*\$2('!(C!2'C(& 3 *\$2('!(&!&#-(&70!&#.*\$2'E!\$(!*!N2(.*\$2('!(C!0#-\$2('0!

HB902-*.^A!0#1%*.!(&!#3(\$2('*.!B*&3!(&!2'J%&9!*'7!\$B#!N*.%#!(C!\$B#!H&(H#&\$9!2'N(.N#7!20!.#00!\$B*'!C2N#! B% '7!7(..*&OA!2'!DB2-B!#N#'\$!*!N2(.*\$2('!(C!0%80#-\$2('!d!(C!\$B20!0#-\$2('!20!*!-.*00!4!3207#3#*'(&:! 8. 4 '9!' *\$%&*.!H#&O ('!DB (!D2..C%..9!H&#N# '\$0A! (80\$&% -\$0A! 3 20.# * 70A!7#.*90A! (&! *\$\$# 3 H\$0!\$ (!H&#N# '\$A

=Y;<*\]:!4!H&2(&!-('N2-\$2('!0B*..!8#!H.#*7#7!*'7!H&(N#'!*0!H&(N27#7!89!0#-\$2('!WWV:<;=:!4!H#&0('!DB(! N2(.*\$#0!0%80#-\$2('!d!(C!\$B20!0#-\$2('!0B*..!8#!E%2.\$9!(C!*!-.*00!1!C#.('9A!%'.#00!\$B#!*-\$!2'N(.N#0!'(!

H&(N202('0!(C!O#-\$2('!YY:<V<!'(\$D2\$B0\$*'72'EA!3('#90!2'!\$B#!QS!O#*.\$BT#\$!C&*%7!H&(O#-%\$2('!&#N(.N2'E! C%'7!OB*..!'(\$!.*HO#!*\$!\$B#!#'7!(C!\$B#!82#''2%3:!

CANNON

12. 4!H#&0('!DB(!N2(.*\$#0!0%80#-\$2('0!=!\$(!Y!(C!\$B20!0#-\$2('!OB*..!8#!.2*8.#!C(&!*!-2N2.!H#'*.\$9!(C!'(\$.#00!\$B*'!C2N#!\$B(%0*'7!7(..*&0!*'7!'(\$!3(&#!\$B*'!\$#'!\$B(%0*'7!7(..*&0!C(&!#*-B!0#H*&*\$#!*-\$!2'!N2(.*\$2('! (C!0%-B!0%80#-\$2('0A!H.%0!\$B&##!\$23#0!\$B#!*3(%'\$!(C!7*3*E#0!DB2-B!\$B#!0\$*\$#!*'7!C#7#&*.!E(N#&'3#'\$! 0%0\$*2'#7!8#-*%0#!(C!\$B#!*-\$!(C!\$B*\$!H#&0('A!#I-#H\$!\$B*\$!\$B#!-(%&\$!3*9!*00#00!'(\$!3(&#!\$B*'!\$D(!\$23#0! \$B#!*3(%'\$!(C!7*3*E#0!DB2-B!\$B#!0\$*\$#!*'7!C#7#&*.!E(N#&'3#'\$!0%0\$*2'#7!8#-*%0#!(C!\$B#!*-\$!(C!\$B#! H#&0('A!20!\$B#!-(%&\$!C2'70F!

(1) UB#!H#&0('!-(332\$%2'E!\$B#!N2(.*\$2('!(C!\$B20!0#-\$2('!C%&'20B#7!H#&0(''#.!#3H.(9#7!89!\$B# *\$\$(&'#9!E#'#&*.!*'7!�H('028.#!C(&!?'N#0\$2E*\$2'E!N2(.*\$2('0!(C!0#-\$2('0!=@=:@<<!\$(!=@=:@<<!\$C'...! 2'C(&3*\$2('!K'(D'!\$(!0%-B!H#&0('!*8(%\$!\$B#!N2(.*\$2('!D2\$B2'!\$B2&\$9!7*90!*C\$#&!\$B#!7*\$#!('!DB2-B!\$B#! 7#C#'7*'\$!C2&0\$!(8\$*2'#7!\$B#!2'C(&3*\$2('M!

(2))%-B!H#&0('!C%..9!-((H#&*\$#7!D2\$B!*'9!E(N#&'3#'\$!2'N#0\$2E*\$2('!(C!0%-B!N2(.*\$2('\\!*'7

(3) 4\$!\$B#!\$23#!0%-B!H#&0('!C%&'20B#7!\$B#!H#&0(''#.!(C!\$B#!*\$\$(&'#9!E#'#&*.!D2\$B!\$B#!2'C(&3*\$2(' *8(%\$!\$B#!N2(.*\$2('A!'(!-&232'*.!H&(O#-%\$2('A!-2N2.!*-\$2('A!(&!*732'20\$&*\$2N#!*-\$2('!B*7!-(33#'-#7!D2\$B! &#OH#-\$!\$(!0%-B!N2(.*\$2('A!*'7!\$B#!H#&0('!727!'(\$!B*N#!*-\$%*.!K'(D.#7E#!(C!\$B#!#120\$#'-#!(C!*'! 2'N#0\$2E*\$2('!2'\$(!0%-B!N2(.*\$2(':!

13. 6H('!-('N2-\$2('!H%&O%*'\$!\$(!\$B20!O#-\$2('A!\$B#!H&(O#-%\$2('!*%\$B(&2\$9!OB*..!H&(N27#!D&2\$\$#'' '(\$2C2-*\$2('!(C!\$B#!-('N2-\$2('!\$(!*..!&#E%.*\$(&9!(&!72O-2H.2'*&9!*E#'-2#O!D2\$B!*%\$B(&2\$9!(N#&!\$B#!-('7%-\$!(C! \$B#!7#C#''7*'\$!B#*.\$B!-*&#!H&(N27#&:!

14. UB#!*\$\$(&'#9!E#'#&*.!3*9!8&2'E!*!-2N2.!*-\$2('!*E*2'0\$!*'9!H#&0('!DB(!0B*..!&#-#2N#!*!B#*.\$B!-*&# H*93#'\$!*0!*!�%.\$!(C!*!C*.0#!0\$*\$#3#'\$!(&!C*.0#!&#H�#'\$*\$2('!(C!*!3*\$#&2*.!C*-\$!3*7#!(&!-*%0#7!\$(!8#! 3*7#!89!\$B*\$!H#&0('!UB#!H#&0('!0B*..!8#!.2*8.#!C(&!%H!\$(!7(%8.#!\$B#!*3(%'\$!(C!*..!H*93#'\$0!&#-#2N#7!89! \$B*\$!H#&0('!8*0#7!%H('!\$B#!C*.0#!0\$*\$#3#'\$!(&!C*.0#!&#H�#'\$*\$2('!(C!*!3*\$#&2*.!C*-\$A!*'7!\$B#!&#*0('*8.#! -(0\$0!*\$\$&28%\$*8.#!\$(!\$B#!H&(0#-%\$2('!(C!\$B#!-2N2.!*-\$2(':!4..!0%-B!&40\$2\$%\$2('!0B*..!8#!H*27!*'7!7#H(02\$#7!\$(! \$B#!-H\$!(C!\$B#!QS!O#*.\$BT#\$!C&*%7!î%&0#3#'\$!C%'7A!*'7!*..!0%-B!-(0\$!î%&0#3#'\$0!0B*..!8#! H*27!*'7!7#H(02\$#7!\$(!\$B#!-H\$!(C!\$B#!QS!O#*.\$BT#\$!C&*%7!H&(0#-%\$2('!&HN(.N2'E!C%'7:!T(! î%&0#3#'\$!(C!0%-B!-(0\$0!*\$\$&28%\$*8.#!\$(!\$B#!H&(0#-%\$2('!(C!\$B#!-2N2.!*-\$2('!0B*..!8#!3*7#!(&!*..(D#7! #1-#H\$!D2\$B!\$B#!*HH&(N*.!(C!\$B#!-(%&\$!B*N2'E!J%&2072-\$2('!(C!\$B#!-2N2.!*-\$2('!C!*E*C'')0B*..!8#!3*7#!(&!*..(D#7! #1-#H\$!D2\$B!\$B#!*HH&(N*.!(C!\$B#!-(%&\$!B*N2'E!J%&2072-\$2('!(C!\$B#!-2N2.!*-\$2('!0B*..!8#!3*7#!(&!*..(D#7! #1-#H\$!D2\$B!\$B#!*HH&(N*.!(C!\$B#!-(%&\$!B*N2'E!J%&2072-\$2('!(C!\$B#!-2N2.!*-\$2('!0B*..!8#!3*7#!(&!*..(D#7! #1-#H\$!D2\$B!\$B#!*HH&(N*.!(C!\$B#!-(%&\$!B*N2'E!J%&2072-\$2('!(C!\$B#!-2N2.!*-\$2('!0B*..!8#!3*7#!(&!*..(D#7! #1-#H\$!D2\$B!\$B#!*HH&(N*.!(C!\$B#!-(%&\$!B*N2'E!J%&2072-\$2('!(C!\$B#!-2N2.!*-\$2('!0B*..!8#!3*7#!(&!*..(D#7! #1-#H\$!D2\$B!\$B#!*HH&(N*.!(C!\$B#!-(%&\$!B*N2'E!J%&2072-\$2('!(C!\$B#!-2N2.!*-\$2('!0B*..!8#!3*7#!(&!*..(D#7! #1-#H\$!D2\$B!\$B#!*HH&(N*.!(C!\$B#!-(%&\$!B*N2'E!J%&2072-\$2('!(C!\$B#!-2N2.!*-\$2('!0B*..!8#!2') 0%80#-\$2('!0B*..!8#!8&(%EB\$!20!�\$2\$%\$2('!*'7!-2N2.!H#'*.\$2#0!H&(N27#7!89!0%80#-\$2('0!==!*'7!=;!(C!\$B20! 0#-\$2('!B*N#!8##'!H&#N2(%0.9!(&7#!*E*2'0\$!\$B#!H#&0('!C!(&!\$B#!0*3#!-*%0#!(C!*-\$2('!!

15. 4 '9!H#&0 ('!DB (!720 - (N#&0!*!N2(.*\$2 ('!89!B2 3 0#.C! (&!B#&0#.C! (&!0% - B!H#&0 ('L0! (&E * '2[*\$2 ('!* '7!DB (&#H (&\$0!0% - B!2'C (& 3 *\$2 ('!N (.% '\$*&2.9!8#C (&#!0% - B!2'C (& 3 *\$2 ('!20!H%8.2-!(&!K' (D '!\$(!\$B#!*\$\$ (& '#9!E#'#&*.! OB*..!' (\$!8#!H& (0# - %\$#7!C (&!*!-&2 3 2'*.!N2 (.*\$2 (':!

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CONSTANTINE

WHISTLEBLOWER PRACTICE

191.905. Fal e a emen o ecei e heal h ca e pa men p ohibi ed -- kickback, b ibe, p po e, p ohibi ed, e cep ion -- ab e p ohibi ed -- penal -- p o ec ion, p oced e -- Medicaid f a d eimb emen f nd c ea ed -- e i ion -- ci il penal -- no ifica ion o di ciplina agencie -ci il ac ion a ho i ed [Effec i e Jan. 1, 2017]

1. T (!B#*.\$B!-*&#!H&(N27#&!OB*..!K'(D2'E.9!3*K#!(&!-*%O#!\$(!8#!3*7#!*!C*.O#!0\$*\$#3#'\$!(&!C*.O# &#H&#O#'\$*\$2('!(C!*!3*\$#&2*.!C*-\$!2'!(&7#&!\$(!&#-#2N#!*!B#*.\$B!-*&#!H*93#'\$A!2'-.%72'E!8%\$!'(\$!.232\$#7!\$(F

(1) R'(D2'E.9!H�#'\$2'E!\$(!*!B#*.\$B!-*&#!H*9#&!*!-.*23!C(&!*!B#*.\$B!-*&#!H*93#'\$!\$B*\$!C*.0#.9 &#H�#'\$0!\$B*\$!\$B#!B#*.\$B!-*&#!C(&!DB2-B!\$B#!B#*.\$B!-*&#!H*93#'\$!20!-.*23#7!D*0!3#72-*..9!'#-#00*&9A!2C! 2'!C*-\$!2\$!D*0!'(\$M!

CONSTANTINE CANNON WHISTLEBLOWER PRACTICE

CONSTANTINE

WHISTLEBLOWER PRACTICE

(&7#&2'E!*'9!B#*.\$B!-*&#:!

- * &#:!

9. Z*-B!0#H*&*\$#!C*.0#!0\$*\$#3#'\$!(&!C*.0#!&#H�#'\$*\$2('!(C!*!3*\$#&2*.!C*-\$!H&(0-&28#7!89!0%80#-\$2('!= (C!\$B20!0#-\$2('!(&!*-\$!H&(0-&28#7!89!0%80#-\$2('!;!(&!Y!(C!\$B20!0#-\$2('!0B*..!-('0\$25%\$#!*!0#H*&*\$#!(CC#'0#! *'7!*!0#H*&*\$#!N2(.*\$2('!(C!\$B20!0#-\$2('A!DB#\$B#&!(&!'(\$!3*7#!*\$!\$B#!0*3#!(&!72CC#&#'\$!\$2`3#0A!*0!H*&\$!(C!\$B#!

8. 4 '9!' *\$%&*.!H#&O('!DB(!D2..0%..9!H&#N#'\$OA!(80\$&%-\$OA!320.#*70A!7#.*90A!(&!*\$\$#3H\$O!\$(!H&#N#'\$A (80\$&%-\$A!320.#*7A!(&!7#.*9!\$B#!-(33%'2-*\$2('!(C!2'C(&3*\$2('!(&!&#-(&70!&#.*\$2'E!\$(!*!N2(.*\$2('!(C!0#-\$2('0! =@=:@<<!\$(!=@=:@=<!20!E%2.\$9!(C!*!-.*00!Z!C#.('9:!

C2&0\$!-('N2-\$2('A!*'7!0B*..!8#!E%2.\$9!(CI*!-.*00!?!C#.('9!%H('!B20!(&!B#&!0#-('7!*'7!0%80#P%#'\$! -('N2-\$2('0:!4'9!H#&0('!DB(!B*0!8##'!-('N2-\$#7!(C!0%-B!N2(.*\$2('0!0B*..!8#!&#C#&!\$(!\$B#!SCC2-#!(C! `'0H#-\$(&!a#'#&*.!D2\$B2'!\$B#!6'2\$#7!)\$*\$#0!b#H*&\$3#'\$!(C!O#*.\$B!*'7!0%3*'!)#&N2-#0:!UB#!H#&0('!0(! &#C#&&!0B*..!8#!0%8J#-\$!\$(!\$B#!H#'*.\$2#0!H&(N27#7!C(&!%'7#&!>;!6:):1:!1B*H\$#&!]A!)%8-B*H\$#&!c`A!)#-\$2('! =Y;<*\]:!4!H&2(&!-('N2-\$2('!0B*..!8#!H.#*7#7!*'7!H&(N#'!*0!H&(N27#7!89!0#-\$2('!WWV:<;=:!4!H#&0('!DB(! N2(.*\$#0!0%80#-\$2('!d!(C!\$B20!0#-\$2('!0B*..!8#!E%2.\$9!(C!*!-.*00!b!C#.('9A!%'.#00!\$B#!*-\$!2'N(.N#0!'(! HB902-*.A!0#1%*.!(&!#3(\$2('*.!B*&3!(&!2'J%&9!*'7!\$B#!N*.%#!(C!\$B#!H&(H#&\$9!2'N(.N#7!20!.#00!\$B*'!C2N#! B%'7!7(..*&0A!2'!DB2-B!#N#'\$!*!N2(.*\$2('!(C!0%80#-\$2('!d!(C!\$B20!0#-\$2('!20!*!-.*00!4!3207#3#*'(&:!

%\$B(&2[#7!2'!>;!6:):1:!)#-\$2('!=Y;<\]8^Y_^2_A!*0!3*9!8#!(&(3!\$23#!*3#'7#7#!*'7!&#E%.*\$2('0! H&(3%.E*\$#7!H%&0%*'\$!\$B#&#\$(:! 6. T(!H#&0('!0B*..!K'(D2'E.9!*8%0#!*!H#&0('!&#-#2N2'E!B#*.\$B!-*&#: 7. 4!H#&0('!DB(!N2(.*\$#0!0%80#-\$2('0!=!\$(!Y!(C!\$B20!0#-\$2('!20!E%2.\$9!(C!*!-.*00!b!C#.('9!%H('!B20!(&!B#& C2&0\$!-('N2-\$2('A!*'7!0B*..!8#!E%2.\$9!(C!*!-.*00!?!C#.('9!%H('!B20!(&!B#&!0#-('7!*'7!0%80#P%#'\$! -('N2-\$2('0:!4'9!H#&0('!DB(!B*0!8##'!-('N2-\$#7!(C!0%-B!N2(.*\$2('0!0B*..!8#!&#C#&!\$(!\$B#!SC2-#!(C!

5. ZI-#H\$2('0!\$(!\$B#!H&(N202('0!(C!0%80#-\$2('0!;!*'7!Y!(C!\$B20!0#-\$2('!0B*..!8#!H&(N27#7!C(&!*0 *%\$B(&2[#7!2'!>;!6:):1:!)#-\$2('!=Y;<*\]8^Y_Z_A!*0!3*9!8#!C&(3!\$23#!\$(!\$23#!*3#'7#7A!*'7!&#E%.*\$2('0!

* '!# 3 H. (9#&!\$(!* '!# 3 H. (9##!C(&!# 3 H. (9 3 # '\$!2'!\$B#!H&(N2O2('!(C!B#*.\$B!-*&#:!

4.) %80#-\$2('0!;!*'7!Y!(C!\$B20!0#-\$2('!0B*..!'(\$!*HH.9!\$(!*!720-(%'\$!(&!(\$B#&!%-\$2('!2'!H&2-# (8\$*2'#7!89!*!B#*.\$B!-*&#!H&(N27#&!2C!\$B#!%-\$2('!2'!H&2-#!20!H&(H#&.9!720-.(0#7!*'7!*HH&(H&2*\$#.9! &#C.#-\$#7!2'!\$B#!-.*23!3*7#!89!\$B#!B#*.\$B!-*&#!H&(N27#&!\$(!\$B#!B#*.\$B!-*&#!H*9#&&!(&!*'9!*3(%'\$!H*27!89!

3. T (!H#&O ('!OB*..!K' (D2'E.9! (0C#&! (&!H*9!*'9!%'#&*\$2('A!2'-.%72'E!*'9!K2-K8*-KA!8&28#A! (&!*\$#A 72&#-\$.9! (&!2'72&#-\$.9A! (N#&\$.9! (&!- (N#&\$.9A!2'!-*OB! (&!2'!K2'7A!\$ (!*'9!H#&O ('!\$ (!2'7%-#!O%-B!H#&O ('!\$ (!&#C#&! *'(\$B#&!H#&O ('!\$ (!*!B#*.\$B!-*&#!H& (N27#&!C (&!\$B#!C%&'20B2'E! (&!*&&*'E2'E!C (&!\$B#!C%&'20B2'E! (C!*'9!B#*.\$B!

C%&'2OB2'É!(C!*'9!B#*.\$B!-*&#M!(&! (2) X%&-B*O2'EA!.#*O2'EA!(&7#&2'E!(&!*&&*'E2'E!C(&!(&!&#-(33#'72'E!H%&-B*O2'EA!.#*O2'E!(&

 * \$#A! 72&# - \$.9! (&!2 ' 72&# - \$.9A! (N#&\$.9! (&!- (N#&\$.9A!2 ' !- * OB! (&!2 ' !K2 ' 7!2 ' !&#\$%& ' !C (&F! (1) "#C#&&2 ' E! * ' (\$B#&!H#&O (' !\$ (!*!B#*.\$B!-*&#!H& (N27#&!C (&!\$B#!C%& ' 20B2 ' E! (&!*&&* ' E2 ' E!C (&!\$B#

2'!\$B#!-.*23!D*0!H&(N27#7:! **2.** T(!H#&0('!0B*..!K'(D2'E.9!0(.2-2\$!(&!&#-#2N#!*'9!%'#&*\$2('A!2'-.%72'E!*'9!K2-K8*-KA!8&28#A!(&

(4) R'(D2'E.9!H�#'\$2'E!*!-.*23!\$(!*!B#*.\$B!-*&#!H*9#&!\$B*\$!C*.0#.9!2'72-*\$#0!\$B*\$!*'9!H*&\$2-%.*& B#*.\$B!-*&#!D*0!H&(N27#7!\$(!*!H#&0('!(&!H#&0('OA!2C!2'!C*-\$!B#*.\$B!-*&#!(C!.#00#&!N*.%#!\$B*'!\$B*\$!7#0-&28#7!

(3) R'(D2'E.9!-('-#*.2'E!(&!C*2.2'E!\$(!720-.(0#!*'9!2'C(&3*\$2('!D2\$B!\$B#!2'\$#'\$!\$(!(8\$*2'!*!B#*.\$B -*&#!H*93#'\$!\$(!DB2-B!\$B#!B#*.\$B!-*&#!H&(N27#&!(&!*'9!(\$B#&!B#*.\$B!-*&#!H&(N27#&!20!'(\$!#'\$2\$.#7A!(&!\$(! (8\$*2'!*!B#*.\$B!-*&#!H*93#'\$!2'!*'!*3(%'\$!E&#*\$#&!\$B*'!\$B*\$!DB2-B!\$B#!B#*.\$B!-*&#!H&(N27#&!(&!*'9!(\$B#&! B#*.\$B!-*&#!H&(N27#&!20!#'\$2\$.#7M!

(2) R'(D2'E.9!-('-#*.2'E!\$B#!(--%&&#'-#!(C!*'9!#N#'\$!*0C#-\$2'E!*'!2'2\$2*.!(&!-('\$2'%#7!&2EB\$!%'7#&!* 3#72-*.!*0020\$*'-#!H&(E&*3!\$(!B*N#!*!B#*.\$B!-*&#!H*93#'\$!3*7#!89!*!B#*.\$B!-*&#!H*9#&!C(&!H&(N272'E! B#*.\$B!-*&#!!

0*3#!(&!O#H*&*\$#!#H2O(7#OA!*O!H*&\$!(C!\$B#!O*3#!O-B#3#!(&!-(%&O#!(C!-('7%-\$A!(&!*O!H*&\$!(C!\$B#!O*3#! -.*23:!

10. `'!*!H&(0#-%2('!H%&0%*'\$!\$(!0%80#-\$2('!=!(C!\$B20!0#-\$2('A!-2&-%30\$*'\$2*.!#N27#'-#!3*9!8# H�#'\$#7!\$(!7#3('0\$&*\$#!\$B*\$!*!C*.0#!0\$*\$#3#'\$!(&!-.*23!D*0!K'(D2'E.9!3*7#:!)%-B!#N27#'-#!(C! K'(D.#7E#!3*9!2'-.%7#!8%\$!0B*..!'(\$!8#!.232\$#7!\$(!\$B#!C(..(D2'EF!

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(1) 4!-.*23!C(&!*!B#*.\$B!-*&#!H*93#'\$!0%832\$\$#7!D2\$B!\$B#!B#*.\$B!-*&#!H&(N27#&LO!*-\$%*.A!C*-O232.#A O\$*3H#7A!\$9H#D&2\$\$#'!(&!O232.*&!O2E'*\$%&#!('!\$B#!-.*23!C(&!B#*.\$B!-*&#!H*93#'\$\\!

(2) 4!-.*23!C(&!*!B#*.\$B!-*&#!H*93#'\$!0%832\$\$#7!89!3#*'0!(C!-(3H%\$#&!82..2'E!\$*H#0!(&!(\$B#& #.#-\$&('2-!3#*'0!!

(3) 4!- (%&0#!(C!-('7%-\$!2'N(.N2'E!(\$B#&!C*.0#!-.*230!0%832\$\$#7!\$(!\$B20!(&!*'9!(\$B#&!B#*.\$B!-*&# H*9#&:!

11. 4 '9!H#&0 ('!- ('N2-\$#7!(C!*!N2(.*\$2 ('!(C!\$B20!0#-\$2 ('A!2'!*772\$2 ('!\$(!* '9!C2'#0A!H#'*.\$2#0!(&!O#'\$#'-#0 23 H (0#7!89!.*DA!OB*..!8#!&#P%2!\$(!3 *K#!�\$2\$%\$2 ('!\$(!\$B#!C#7#&*.!*'7!0\$*\$#!E (N#&'3 #'\$0A!2'!*'!*3 (%'\$! *\$!.#*0\$!#P%*.!\$(!\$B*\$!%'.*DC%..9!H*27!\$(!(&!89!\$B#!H#&0('A!*'7!0B*..!8#!&#P%2!\$(!î%&0#!\$B#!

CONSTANTINE

WHISTLEBLOWER PRACTICE

CONSTANTINE CANNON WHISTLEBLOWER PRACTICE

(1) UB#!-(%&\$!C2'70!8&(%EB\$!*!C&2N(.(%0!(&!-.#*&.9!N#I*\$2(%0!-.*23))

1. 4 ' !# 3 H. (9#&!0B*..!' (\$!720-B*&E#A!7#3 (\$#A!0%0H# '7A!\$B&#*\$# ' A!B*&*00A! (&! (\$B#&D20#!720-&232' *\$#!*E*2' 0\$ * '!# 3 H. (9##!?' !\$B#!\$#& 3 0!* '7!- ('72\$2 ('0! (C!# 3 H. (9 3 # ' \$!8#-*%0#!\$B#!# 3 H. (9##!2' 2\$2*\$#0A!*0020\$0!?' A! (& H*&\$2-2H*\$#0!?'!*!H& (-##72' E! (&!- (%&\$!*-\$2 ('!% '7#&!0#-\$2 ('0!=@=:@<<!\$ (!=@=:@=<!!) %-B!H& (B282\$2 ('!0B*..!' (\$ *HH.9!\$(!*'!# 3 H. (9 3 # '\$!*-\$2 ('!*E*2'0\$!*'!# 3 H. (9##!DB (F

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2. 4 '9!H#&0('!DB(!20!\$B#!(&2E2'*.!O(%&-#!(C!2'C(&3*\$2('!*8(%\$!\$B#!D2..C%.!N2(.*\$2('!89!*'9!H#&0('!(C O#-\$2('!Yd:>d<!OB*..!&#-#2N#!\$#'!H#&-#'\$!(C!\$B#!*3(%'\$!(C!-(3H#'O*\$2('!\$B*\$!D(%.7!B*N#!8##'!H*27!\$B#! #3H.(9##!C(&C#2\$2'E!B20!(&!B#&!H(O2\$2('!%'7#&!O#-\$2('!Yd:>d<!2C!\$B#!#3H.(9##!D*O!C(%'7!\$(!B*N#!*-\$#7! C&*%7%.#'\$.9!2'!-(''#-\$2('!D2\$B!\$B#!O\$*\$#!3#72-*.!*0020\$*'-#!H&(E&*3:!

1. 4 '9!H#&0('!DB(!20!\$B#!(&2E2'*.!0(%&-#!(C!\$B#!2'C(&3*\$2('!%0#7!89!\$B#!*\$\$(&'#9!E#'#&*.!\$(!8&2'E!*' *-\$2('!%'7#&!0%80#-\$2('!=>!(C!0#-\$2('!=@=:@<W!0B*..!&#-#2N#!\$#'!H#&-#'\$!(C!*'9!&#-(N#&9!89!\$B#!*\$\$(&'#9 E#'#&*.:!40!%0#7!2'!\$B20!0#-\$2('A!G(&2E2'*.!0(%&-#!(C!2'C(&3*\$2('G!3#*'0!2'C(&3*\$2('!'(!H*&\$!(C!DB2-B!B*O 8##'!H&#N2(%0.9!720-.(0#7!\$(!(&!K'(D'!89!\$B#!E(N#&'3#'\$!(&!H%8.2-:!`C!\$B#!-(%&\$!C!'70!\$B*\$!\$B#!H#&O('!DB(D*0!\$B#!(&2E2'*.!0(%&-#!(C!2*C(&3*\$2('!'(!H*&\$!C!'70!\$B*\$!\$B#!H#&O('!DB(D*0!\$B#!(&2E2'*.!0(%&-#!(C!\$B#!2'C(&3*\$2('!%0#7!89!\$B#!*\$\$(&'#9!E#'#&*.!\$(!8&2'E!*'!*-\$2('!%'7#& 0%80#-\$2('!=>!(C!0#-\$2('!=@=:@<W!H.*''#7A!2'2\$2*\$#7A!(&!H*&\$2-2H*\$#7!2'!\$B#!-('7%-\$!%H('!DB2-B!\$B#!*-\$2(' 20!8&(%EB\$A!0%-B!H#&0('!0B*..!'(\$!8#!#'\$2.#7!\$(!*'9!H#&-#'\$*E#!(C!\$B#!&#-(N#&9!(8\$*2'#7!2'!0%-B!*-\$2(':

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15. 4 '9!H#&0 ('!DB (!720 - (N#&0!*!N2(.*\$2('!89!B2 3 0#.0! (&!B#&0#.0! (&!0% - B!H#&0 ('L0! (&E * '2[*\$2('!* '7!DB (&#H (&\$0!0% - B!2 'C (& 3 *\$2('!N (.% '\$*&2.9!8#C (&#!0% - B!2 'C (& 3 *\$2('!20!H%8.2-!(&!K' (D'!\$(!\$B#!*\$\$(&'#9!E#'#&*.! 0B*..!' (\$!8#!H& (0# - %\$#7!C (&!*!-&2.3 2'*.!N2(.*\$2 (':!

H*93#'\$!*0!*!�%\$!(C!*!C*.0#!0\$*\$#3#'\$!(&!C*.0#!&#H�#'\$*\$2('!(C!*!3*\$#&2*.!C*-\$!3*7#!(&!-*%0#7!\$(!8#! 3*7#!89!\$B*\$!H#&0(':!UB#!H#&0('!0B*..!8#!.2*8.#!C(&!%H!\$(!7(%8.#!\$B#!*3(%'\$!(C!*..!H*93#'\$0!&#-#2N#7!89! \$B*\$!H#&0('!8*0#7!%H('!\$B#!C*.0#!0\$*\$#3#'\$!(&!C*.0#!&#H�#'\$*\$2('!(C!*!3*\$#&2*.!C*-\$A!*'7!\$B#!&#*0('*8.#! -(0\$0!*\$\$&28%\$*8.#!\$(!\$B#!H&(0#-%\$2('!(C!\$B#!-2N2.!*-\$2(':!4..!0%-B!�\$2\$%\$2('!0B*..!8#!H*27!*'7!7#H(02\$#7!\$(! \$B#!-H\$!(C!\$B#!QS!O#*.\$BT#\$!C&*%7!î%&0#3#'\$!C%'7A!*'7!*..!0%-B!-(0\$!î%&0#3#'\$0!OB*..!8#! H*27!*'7!7#H(02\$#7!\$(!\$B#!-H\$!(C!\$B#!QS!O#*.\$BT#\$!C&*%7!H&(0#-%\$2('!&#N(.N2'E!C%'7:!T(! î%&0#3#'\$!(C!0%-B!-(0\$0!*\$\$&28%\$*8.#!\$(!\$B#!H&(0#-%\$2('!(C!\$B#!-2N2.!*-\$2('!0B*..!8#!3*7#!(&!*..(D#7! #1-#H\$!D2\$B!\$B#!*HH&(N*.!(C!\$B#!-(%&\$!B*N2'E!J%&2072-\$2('!(C!\$B#!-2N2.!*-\$2('!C!*C**2('!0B*..!8#!3*7#!(&!*..(D#7! #1-#H\$!D2\$B!\$B#!*HH&(N*.!(C!\$B#!-(%&\$!B*N2'E!J%&2072-\$2('!(C!\$B#!-2N2.!*-\$2('!C!*C**2('!0B*..!8#!3*7#!(&!*..(D#7! #1-#H\$!D2\$B!\$B#!*HH&(N*.!(C!\$B#!-(%&\$!B*N2'E!J%&2072-\$2('!(C!\$B#!-2N2.!*-\$2('!C!*C***2('!C!*C***2('!C!*C***2('!C!*C***2('!C!*C***2('!C!*C***2('!C!*C***2('!C!*C***2('!C!*C***2('!C!*C***2('!C!****2('!C!*****2))

14. UB#!*\$\$(&'#9!E#'#&*.!3 *9!8&2'E!*!-2N2.!*-\$2('!*E*2'0\$!*'9!H#&0('!DB(!0B*..!&#-#2N#!*!B#*.\$B!-*&#

\$B#!7#C#`7*`\$!B#*.\$B!-*&#!H&(N27#&:!

CONSTANTINE

WHISTLEBLOWER PRACTICE

13. 6H('!-('N2-\$2('!H%&O%*'\$!\$(!\$B20!0#-\$2('A!\$B#!H&(O#-%\$2('!*%\$B(&2\$9!OB*..!H&(N27#!D&2\$\$#' '(\$202-*\$2('!(C!\$B#!-('N2-\$2('!\$(!*..!&#E%.*\$(&9!(&!720-2H.2'*&9!*E#'-2#0!D2\$B!*%\$B(&2\$9!(N#&!\$B#!-('7%-\$!(C!

8(%\$!\$B#!N2(.\$2('A!'(!-&232'*.!H&(O#-%\$2('A!-2N2.!*-\$2('A!(&!*732'20\$&*\$2N#!*-\$2('!B*7!-(33#'-#7!D2\$B! &#OH#-\$!\$(!0%-B!N2(.*\$2('A!*'7!\$B#!H#&O('!727!'(\$!B*N#!*-\$%*.!K'(D.#7E#!(C!\$B#!#120\$#'-#!(C!*'! 2'N#0\$2E*\$2('!2'\$(!0%-B!N2(.*\$2(':!

(3) 4\$!\$B#!\$23#!0%-B!H#&0('!C%&'20B#7!\$B#!H#&0(''#.!(C!\$B#!*\$\$(&'#9!E#'#&*.!D2\$B!\$B#!2'C(&3*\$2('

(2) UB#!-(%&\$!C2'70!\$(!B*N#!H.*''#7A!2'2\$2*\$#7A!(&!H*&\$2-2H*\$#7!2'!\$B#!-('7%-\$!%H('!DB2-B!\$B#!*-\$2('20!8&(%EB\$!!!(&!

(3) `0!-('N2-\$#7!(C!-&232'*.!-('7%-\$!*&202'E!C&(3!*!N2(.*\$2('!(C!O#-\$2('0!=@=:@<<!\$(!=@=:@=<:

2. 4 ' !# 3 H. (9#&!DB (!N2(.*\$#0!\$B20!0#-\$2(' !20!.2*8.#!\$(!\$B#!# 3 H. (9##!C(&!*..!(C!\$B#!C(..(D2'EF

(1) "#2'0\$*\$#3#'\$!\$(!\$B#!#3H.(9##L0!H(02\$2('!D2\$B(%\$!.(00!(C!0#'2(&2\$9M

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(2) UD(!\$23#0!\$B#!*3(%'\$!(C!.(0\$!8*-K!H*9)

CONSTANTINE

WHISTLEBLOWER PRACTICE

(3) ` '\$#�\$!(' !\$B#!8*-K!H*9!*\$!\$B#!&*\$#!(C!(' #!H#&-# ' \$!(N#&!\$B#!H&23#!&*\$#:

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1. UB#!*\$\$(&'#9!E#'#&*.!0B*..!B*N#!*%\$B(&2\$9!\$(!2'N#0\$2E*\$#!*..#E#7!(&!0%0H#-\$#7!N2(.*\$2('0!(C!O#-\$2('0 + +

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CONSTANTINE

WHISTLEBLOWER PRACTICE

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ec ion.!

191.914. Fal e epo o claim, penal [Effec i e n il Jan. 1, 2017]

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CONSTANTINE CANNON WHISTLEBLOWER PRACTICE

4.) # - \$2 (' 0!=@=:@<<!\$ (!=@=:@=<!OB*..! ' (\$!8#!- (' 0\$&%#7!\$ (!H& (B282\$! (&!.23 2\$!* ' 9! (\$B#&!-&23 2` *.! (&!-2N2. * -\$2('!*E*2'0\$!*!B#*.\$B!-*&#!H&(N27#&!C(&!\$B#!N2(.*\$2('!(C!*'9!(\$B#&!.*D:!4'9!-(3H.*2'\$A!2'N#0\$2E*\$2('!(&! &#H(&\$!&#-#2N#7!(&!-(3H.#\$#7!H%&0%*'\$!\$(!0#-\$2('0!=@V:<]<!*'7!=@V:<@<A!0%80#-\$2('!;!(C!0#-\$2('! ;<W:@d] A!O#-\$2('0!Y] W:@@=!\$(!Y] W:@@>A!O#-\$2('!W] V:YV] A! (&!O#-\$2('0!=@;:;>] W!*'7!=@;:;>V<ee!!!A!DB2-B! 2'72-*\$#0!*!N2(.*\$2('!(C!O#-\$2('O!=@=:@<<!\$(!=@=:@=<A!OB*..!8#!\#C#&!\$(!\$B#!*\$\$(&'#9!E#'#&*.:!4!&#C#&&*.!\$(! \$B#!*\$\$(&'#9!E#'#&*.!H%&0%*'\$!\$(!\$B20!0%80#-\$2('!0B*..!'(\$!H&#-.%7#!\$B#!*E#'-2#0!-B*&E#7!D2\$B!#'`((&-2'E! \$B#!C(&#E(2'E!O#-\$2('O!C&(3!-('7%-\$2'E!2'N#O\$2E*\$2('OA!H&(N272'E!H&(\$#-\$2N#!O#&N2-#O!(&!\$*K2'E! *732'20\$&*\$2N#!*-\$2('!&#E*&72'E!\$B#!-(3H.*2'\$A!2'N#0\$2E*\$2('!(&!&#H(&\$!&#C#&!\$(!\$B#!*\$\$(&'#9!E#'#&*.A!*0! 3 *9!8#!H& (N27#7!89!0%-B!0#-\$2 ('0\!!H& (N27#7!\$B*\$!*..! 3 *\$#&2*.!7#N#. (H#7!89!\$B#!*\$\$ (& '#9!E# '#&*.!2 ' !\$B#! - (%&0#!(C!*'!2'N#0\$2E*\$2('!H%&0%*'\$!\$(!0#-\$2('0!=@=:@<<!\$(!=@=:@=<!0B*..!'(\$!8#!0%8J#-\$!\$(!0%8H(#'*A! 720-(N#&9A!(&!(\$B#&!.#E*.!(&!*732'20\$&*\$2N#!H&(-#00!2'!\$B#!-(%&0#!(C!*'9!0%-B!*732'20\$&*\$2N#!*-\$2(':!)#-\$2('0!=@=:@<<!\$(!=@=:@=<!\$*K#!H&#-#7#'-#!(N#&!\$B#!H&(N2O2('0!(C!O#-\$2('0!=@V:<]<!*'7!=@V:<@<A!

0%80#-\$2('!;!(C!0#-\$2('!;<W:@d]A!0#-\$2('0!Y]W:@@=!\$(!Y]W:@@>A!0#-\$2('!W]V:YV]A!*'7!0#-\$2('0!dd<:Y<<!

1. 4 '9!H#&O('!DB(!2'\$# '\$2('*..9!C2.#0!*!C*.0#!&#H(&\$!(&!-.*23!*..#E2'E!*!N2(.*\$2('!(C!O#-\$2('0!=@=:@<<!\$(=@=:@=<!20!E%2.\$9!(C!*!-.*00!4!3207#3#*'(&:!4'9!0#-('7!(&!0%80#P%#'\$!N2(.*\$2('!(C!\$B20!0#-\$2('!20!*!-.*00

2. 4 '9!H#&0('!DB(!&#-#2N#0!*'9!-(3H#'0*\$2('!2'!#I-B*'E#!C(&!K'(D2'E.9!C*2.2'E!\$(!&#H(&\$!*'9

3. T (!H#&0 ('!OB*..!K' (D2'E.9A!D2\$B!\$B#!2'\$#'\$!\$(!7#C&*%7!\$B#!3#72-*.!*0020\$*'-#!H&(E&*3A!7#0\$&(9!(& - (' - #*.!0%-B!&#- (&70!*0!*&#! ' #-#00*&9!\$(!0%..9!720-.(0#!\$B#! ' *\$%&#! (0!\$B#!B#*.\$B!-*&#!0(&!DB2-B!*!-.*23! D*0!0%832\$\$#7!(&!H*93#'\$!D*0!&#-#2N#7!%'7#&!*!3#72-*.!*0020\$*'-#!H&(E&*3A!(&!0%-B!&#-(&70!*0!*&#! '#-#00*&9!\$(!0%..9!720-.(0#!*..!2'-(3#!*'7!#IH#'72\$%�!%H('!DB2-B!&*\$#0!(0!H*93#'\$!D#&#!8*0#7!%'7#&!*! 3#72-*.!*0020\$*'-#!H&(E&*3:!6H('!0%832\$\$2'E!*!-.*23!C(&!(&!%H('!&#-#2N2'E!H*93#'\$!C(&!B#*.\$B!-*&#! %'7#&!*!3#72-*.!*0020\$*'-#!H&(E&*3A!*!H#&0('!0B*..!'(\$!7#0\$&(9!(&!-('-#*.!*'9!&#-(&70!C(&!2N#!9#*&0! *C\$#&!\$B#!7*\$#!('!DB2-B!H*93#'\$!D*0!&#-#2N#7A!20!H*93#'\$!D*0!&#-#2N#7A!(&!C(&!C2N#!9#*&0!*C\$#&!\$B#!7*\$#! ('!DB2-B!\$B#!-.*23!D*0!0%832\$#7A!2!H*93#'\$!D*0!'(\$!&#-#2N#7:!4'9!H&(N27#&!DB(!K'(D2'E.9!7#0\$&(90!(&! - ('-#*.0!0%-B!&#- (&70!20!E%2.\$9!(C!*!-.*00!4!3207#3#*'(&:!

8#!*7320028.#!2'\$(!#N27#'-#A!&#E*&7.#00!(C!*'9!0\$*\$%\$(&9!(&!-(33('!.*D!H&2N2.#E#!DB2-B!0%-B!B#*.\$B!-*&#! H& (N27#&A!&# - (&7!-%0\$ (72*'!(&!H*\$2#'\$!32EB\$!(\$B#&D20#!2'N(K#!(&!*00#&\$:!UB#!H& (N202('0!(C!0#-\$2('!Y;d:=W=e! 0B*..!'(\$!*HH.9!\$(!*-\$2('0!8&(%EB\$!H%&0%*'\$!\$(!0#-\$2('0!=@=:@<<!\$(!=@=:@=<:!UB#!*\$\$(&'#9!E#'#&*.!0B*..!'(\$! 720-.(0#!*'9!&#-(&7!(8\$*2'#7!H%&0%*'\$!\$(!\$B20!0#-\$2('A!(\$B#&!\$B*'!2'!-(''#-\$2('!D2\$B!*!H&(-##72'E! 2'0\$2\$%\$#7!(&!H#'72'E!2'!*'9!-(%&\$!(&!*732'20\$&*\$2N#!*E#'-9!UB#!*--#00A!H&(N202('A!%0#A!*'7!720-.(0%&#!(C! &#-(&70!(&!3*\$#&2*.!0%8J#-\$!\$(!\$B#!H&(N202('0!(C!>;!6:):1:!)#-\$2('!;@<77\;!0B*..!8#!0%8J#-\$!\$(!0*27! 0#-\$2('A!*0!3*9!8#!*3#'7#7!C&(3!\$23#!\$(!\$23#A!*'7!\$(!&#E%.*\$2('0!H&(3%.E*\$#7!H%&0%*'\$!\$(!0*27!0#-\$2(':!

<u>"#\$%&'!\$(!)\$*\$#!+!,(-*.!/*.0#!1.*230!4-\$0</u>!