



## B. Procedure for search warrants

1. Call legal counsel immediately. If possible and if time permits, also contact the CEO, COO, and/or the Compliance Officer. Legal counsel or a representative will review the proper procedure with the employee. Legal counsel will be asked to proceed to the site immediately to provide on-site support and advice.
  - Legal Counsel – Joe Lavey at 906-228-2205
  - Chief Executive Officer – Doug Morton at 906-225-7201
  - Chief Operating Officer – Cyndi Shaffer at 906-225-7253
  - Compliance Officer – Diane Bennett at 906-226-0043
2. Request identification from the individual and the reason for the visit. Record the name of the lead agent and the agency they represent. **Do not attempt to photocopy credentials as this is a violation of Federal law.**
3. The government agent is required to provide a copy of the search warrant at the time of the search. If it is not provided, request a copy of the search warrant document. Carefully examine the search warrant for:
  - ✓ Any limitations on the areas or locations specified in the document to be searched?
  - ✓ Is the warrant being executed during the hours indicated on the document?
  - ✓ Has it been signed by a judge?
4. You may politely object if you believe there is any obvious problem with the warrant or if you believe the agents are searching anything or anywhere you feel is outside the scope of the warrant, but do not interfere should agents proceed and search. Note the fact of your objection and get this information to legal counsel.
5. Always remain present while the agents are conducting the search. In cases where agents are in multiple areas, assign staff to act as monitors to document what has been searched and what documents or object have been seized. Never interfere with the search.
6. Request an “inventory list” of the documents and items seized by the agents. Try to make sure there is enough detail to be able to identify the documents and items taken by the agents. Also maintain a record of the areas searched and documents/items seized that you or assigned staff have observed.
7. Provide information to the agents to direct them to the information requested, but you do not need to submit to any form of questioning or interviewing.
8. The senior employee assigned to deal with search warrants or their designee should be responsible for responding to the agent’s questions.
9. Any questions by employees as to how to proceed, other than as described above, should be answered by legal counsel. The senior manager should not advise employees of their legal rights nor direct them in any way to interfere with the process of the search.

## C. Procedure for subpoenas (In the course of a government investigation.)

1. Any subpoena, whether delivered in person or by mail, should be delivered immediately to NorthCare’s CEO, COO, or supervisor present on site. And, a copy of the subpoena should be faxed to legal counsel.
2. If the subpoena is delivered in person:
  - ✓ The employee receiving it should get the name, title and telephone number of the agent who serves the subpoena, as this information must be given to NorthCare’s CEO, COO, or supervisor on duty along with the subpoena.

- ✓ The employee receiving the subpoena or NorthCare's CEO, COO, or supervisor should provide the agent/investigator with the information they need to deliver the subpoena to the appropriate individual.
  - ✓ Do not volunteer any information to an agent/investigator or submit to any form of questioning or interviewing.
3. NorthCare's CEO, COO, or supervisor upon notice or receipt of the subpoena should contact, as soon as possible, the CEO, COO, compliance officer and legal counsel.
  4. Legal counsel will provide direction on how to proceed with the organization's response.