Narrative Investigation Plan

● **Introduction**
  — A synopsis of the complaint and a “story” of the case.
  — A brief overview of the planned investigation.

● **Legal theory or theories of potential harm**
  — What is the conduct being investigated and how might it violate the law?
  — What harms have consumers suffered (or likely will suffer) as a result of the conduct in question?
  — What are the legal elements of each theory?

● **Evidence (relevant facts)**
  — What are the facts learned to date?
    - The information that supports each theory of potential harm
    - The information that refutes each theory of potential harm
  — What are the unresolved questions critical to the investigation?
  — What types of information are needed to test theories of harm and resolve key questions?
  — What additional information is needed to satisfy the legal elements?
  — What are the best sources for the needed information?
  — What are the best methods for obtaining the needed information?
  — What are the evidentiary standards required by the decision maker?

● **Arguments and defenses**
  — What legal and economic arguments might the target(s) of the investigation raise?
  — What evidence might support/rebut those arguments?

● **Remedies**
  — What remedies will address the harm?
  — What evidence is needed to determine the appropriate remedy?

● **Timing and investigative tasks**
  — Estimate the time and resources needed to complete the investigation
  — Identify specific tasks, assign responsibilities, and set internal deadlines
  — Plans for coordination with other jurisdictions, if relevant