

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