HIWU'S REPORT ON ITS INVESTIGATION OF THE UNIVERSITY OF KENTUCKY EQUINE ANALYTICAL CHEMISTRY LABORATORY
SEPTEMBER 17, 2024

EXECUTIVE SUMMARY

On March 5, 2024, the Horseracing Integrity & Welfare Unit ("HIWU") and the Horseracing Integrity and Safety Authority ("HISA") announced that HIWU was investigating the performance of the University of Kentucky Equine Analytical Chemistry Laboratory ("UK-EACL") under HISA's Anti-Doping and Medication Control ("ADMC") Program. The following report details the events leading up to the announced investigation, including UK-EACL's persistent delays in reporting results, unprofessional staff behavior, and unresponsiveness to HIWU communications. Ultimately, the catalyst for the commencement of the investigation was the discovery by HIWU of intentional misrepresentations that were made about Sample analysis.

The HIWU investigation involved more than 15 UK-EACL current and former staff interviews, a comprehensive laboratory performance and document review, and the re-analysis of potentially affected Samples. Key findings include:

- UK-EACL did not comply with HIWU-mandated Testing Specifications and Instructions, including its standard operating procedures and analysis methods;
- UK-EACL misrepresented both its ability to test for specific Prohibited Substances, including erythropoietin ("EPO"), and the completion of analysis for certain Prohibited Substances on specific Samples; and
- UK-EACL failed to perform confirmatory analysis on 91 Samples whose initial screening showed the potential presence of a Prohibited Substance and therefore required such analysis, instead reporting the Samples as Negative at the direction of UK-EACL Director Dr. Scott Stanley.

As a result of these findings, HIWU re-analyzed and reconciled all potentially affected Samples remaining at UK-EACL, and HISA sought repayment from the University of Kentucky for the laboratory's non-compliant services. HIWU has also bolstered its oversight measures with respect to all Program Laboratories.

After further analysis of potentially affected Samples from UK-EACL, two Samples, a Post-Race Sample and a Vets' List Sample, were confirmed as Adverse Analytical Findings ("AAF") for Controlled Medication Substances. Both will be processed under the ADMC Program. HIWU will cover the costs of B Sample analysis (if it is requested) in these cases. Additionally, as to AAFs originally reported by UK-EACL, HIWU discovered two Samples that should not have been reported as AAFs because, after re-analysis, the presence of the relevant Controlled Medication Substance in an amount in excess of its Screening Limit was not detected. Neither case resulted in a suspension, and HIWU will withdraw the sanctions imposed in those cases, including ensuring that all fines, costs, and purses are returned to the relevant Covered Persons. Further, given the obvious delay in bringing these cases, HIWU will not seek any purse forfeitures and instead will simply ensure that the affected parties are made financially whole.

Lastly, the goals of this investigation were to protect the integrity of the ADMC Program process, the interests of Covered Persons, and the welfare of Covered Horses. As a result, HISA and HIWU consider this investigation to be an open one for the foreseeable future. All

available evidence has been secured for this purpose. It should also be noted that UK-EACL is not currently an ADMC Program Laboratory, and HIWU ceased sending the laboratory Samples for analysis in February. Since UK-EACL's accreditation from the Racing Medication & Testing Consortium ("RMTC") is suspended, the laboratory is not legally eligible to be a Program Laboratory at this time. In addition, UK-EACL is not on HIWU's list of laboratories to be approved for probationary HISA Equine Analytical Laboratory ("HEAL") accreditation beginning on January 1, 2025.

I. BACKGROUND

When the ADMC Program went into effect on May 22, 2023, UK-EACL was one of the six (6) Program Laboratories. UK-EACL had been selected as the Program Laboratory for Samples collected in Kentucky as per the Voluntary Implementation Agreement executed among HISA, HIWU and the Kentucky Horse Racing Commission ("KHRC") in March 2023,[1] and HISA and HIWU determined that Samples collected in Florida would also be sent to UK-EACL. Under the Act, HISA was required to utilize the services of the UK-EACL because it was accredited by the RMTC and the KHRC selected UK-EACL, who analyzed samples prior to HISA, as its laboratory for A Sample analysis.

Dr. Scott Stanley, the Laboratory Director for UK-EACL, was a member of HISA's ADMC Committee from its inception through December 2022 and was involved in the drafting and review of the ADMC Program Rules submitted by HISA to the Federal Trade Commission ("FTC") for approval. Once negotiations began with the KHRC for a Voluntary Implementation Agreement and UK-EACL for laboratory services, HISA determined that it was a conflict of interest for Dr. Stanley to continue serving on their ADMC Committee and asked him to resign from the Committee, which he did.

From the outset of the ADMC Program on May 22, 2023, the behavior of Dr. Stanley and some of his staff at UK-EACL was challenging. They failed to acknowledge emails from HIWU staff with respect to matters critical to the operation of the ADMC Program and were unresponsive to requests and questions from HIWU, resulting in the need for repeated follow-up and escalation by HIWU. In addition, there was a level of incivility in their communications to HIWU staff that was frequently unprofessional. There were attempts to address this through various channels, all of which ultimately proved unsuccessful.

As implementation of the ADMC Program continued throughout 2023 and into 2024, UK-EACL failed to meet the required and agreed-upon deadlines for results reporting, which caused significant inconvenience to horsemen. They failed to request extensions from HIWU for such late reporting or to provide a justification for delays, both of which were required procedures for Program Laboratories. In addition to general reporting delays, UK-EACL was unable to properly report the results of its analyses of HISA/HIWU Samples to HIWU through its Laboratory Inventory Management System ("LIMS") in accordance with the HIWU-defined electronic reporting requirements, which delayed the reporting of these results. Dr. Stanley and his team continuously blamed developers and University system limitations for these problems and failed to take proactive measures to help remedy the situation.

[1] Under the Horseracing Integrity and Safety Act (the "Act"), States that have an eligible equine testing laboratory in their State have the right to select that laboratory as the laboratory under the ADMC Program to receive and analyze the State's A Samples.

There were also delays in the issuance of Laboratory Documentation Packages for both A Sample and B Sample analyses, and several Laboratory Documentation Packages had to be revised multiple times to comply with the established HIWU reporting standards.

Dr. Stanley's conduct on HIWU's weekly calls with Laboratory Directors was often disruptive and disrespectful to colleagues. Furthermore, members of the UK-EACL staff had a contentious relationship with the staff of the Florida Gaming Control Commission (the "Florida Commission"), including HIWU-certified Sample Collection Personnel. HIWU received numerous complaints from the Florida Commission and 1/ST about the lack of responsiveness and incivility of Dr. Stanley and his staff to their employees. Both the Florida Commission and 1/ST also inquired about the possibility of transferring analysis of their Samples to another Program Laboratory, and some Florida Commission Sample Collection Personnel even threatened to resign as a direct consequence of Dr. Stanley's conduct. Dr. Stanley's poor conduct was raised with his superiors at the University on multiple occasions, and they provided assurances that it would be addressed. Unfortunately, the issues remained unresolved.

In HIWU's dealings with UK-EACL, compliance and communication challenges were encountered across multiple groups, including Science, Operations, and Results Management. HIWU staff continuously made efforts to improve communications and relationships, but without success. For example, HIWU staff facilitated an in-person meeting between Dr. Stanley and the Florida Commission Sample Collection Personnel, but it proved to be unproductive.

Ultimately, after such efforts to resolve the problems were unsuccessful, the decision was made to stop sending Samples from Florida to UK-EACL, primarily due to the ongoing conflicts between UK-EACL staff and HIWU's constituents in Florida. On February 12, 2024, HIWU advised HISA of this decision and that all Samples collected in Florida would be sent to a different Program Laboratory. HIWU also advised that, if the concerns regarding UK-EACL were not remedied, HIWU would be forced to terminate its relationship with UK-EACL. It should be noted that, at this stage, HIWU was not yet aware of any deficiencies related to the analyses performed by UK-EACL on HISA/HIWU Samples.[2]

On February 13, 2024, Ben Mosier, HIWU's Executive Director, and Lisa Lazarus, the Chief Executive Officer of HISA, met with University of Kentucky leadership, including Dr. Nancy Cox, the Dean of the University's College of Agriculture, Food and Environment, about the decision to stop sending ADMC Program Samples from Florida to UK-EACL. During that meeting, HIWU and HISA were notified that the University was conducting a human resources-related investigation of Dr. Stanley and his management of UK-EACL. Consequently, Dr. Stanley had limited access to UK-EACL. Given this update, it was further decided that Samples from Kentucky would also no longer be sent to UK-EACL and would be re-assigned to another Program Laboratory. Therefore, on February 16, 2024, HIWU stopped sending any Samples to UK-EACL.

After that date, HIWU staff no longer had communications with Dr. Stanley with respect to UK-EACL's performance under the ADMC Program. Instead, they were in communication with other members of the UK-EACL staff. On March 1, 2024, the University advised HISA and HIWU that Dr. Stanley had been removed as Director of UK-EACL.

[2]HIWU was aware that UK-EACL had failed to detect triamcinolone, a Controlled Medication Substance, in a double-blind blood sample submitted through the RMTC's External Quality Assurance Program.

II. HIWU'S INVESTIGATION OF UK-EACL

In November 2023, HIWU asked Dr. Stanley if UK-EACL could perform targeted confirmatory analysis of a blood Sample that another Program Laboratory suspected contained erythropoietin ("EPO"), a Banned Substance. Dr. Stanley agreed to perform this analysis. In November and December 2023, HIWU made numerous requests to Dr. Stanley via telephone, email, and in-person regarding the status of the analysis of the Sample. Finally, in late December, Dr. Stanley notified HIWU that the Sample had been analyzed once, and the presence of EPO was not confirmed, but UK-EACL would repeat the analysis to ensure that the result was accurate. In January 2024, Dr. Stanley notified HIWU that EPO was not detected in the Sample.

However, on February 23, 2024, after HIWU had stopped sending HISA/HIWU Samples to UK-EACL, a HIWU staff member contacted UK-EACL and asked how much of the Sample was left because HIWU was considering having the Sample analyzed by another Program Laboratory to corroborate the Negative finding reported by UK-EACL. Later that day, HIWU was advised by UK-EACL staff that the Sample at issue had never been analyzed and, in fact, had never even been opened; it was still sealed in UK-EACL's storage refrigerator. (The other Program Laboratory ultimately did not confirm the presence of EPO in the Sample at issue.)

Due to the misrepresentations made by Dr. Stanley about the unanalyzed EPO Sample, HIWU decided to further investigate the performance of UK-EACL under the ADMC Program. On March 5, 2024, HISA and HIWU announced that HIWU was investigating the performance of UK-EACL. Subsequently and unrelated to HIWU's investigation, on March 7, 2024, the RMTC's Executive Committee suspended UK-EACL's RMTC accreditation for non-compliance with the RMTC's Code of Standards. (In May, the RMTC gave UK-EACL up to an additional six (6) months to cure its non-compliance.)

With the cooperation of the University of Kentucky, HIWU conducted more than 15 interviews of current and former UK-EACL staff and received extensive documentation from UK-EACL. In June 2024, HIWU requested an interview with Dr. Stanley through his counsel; however, they did not agree to an interview.

On March 12, HIWU began transferring the Samples still at UK-EACL to other Program Laboratories.

In late March, HIWU began receiving documents from UK-EACL, including: an inventory of all retained HISA/HIWU Samples; the Standard Operating Procedures ("SOPs") relating to the processing of samples; the HIWU serum screen, the HIWU urine screen, and the Non-Steroidal Anti-Inflammatory Drug plasma screen; the UK-EACL Laboratory Ethics and Conflict of Interest Policy; EPO detection information; the UK-EACL Administrative Manual/Organizational Chart; UK-EACL training records; the ISO 17025 accrediting body's ("A2LA") 2023 assessment for UK-EACL; and UK-EACL's response to the A2LA assessment.

Most significantly, HIWU received and reviewed information relating to 146 unique blood or urine Samples that "failed" initial screening analysis (i.e., initial screening detected the potential presence of Prohibited Substances) but, instead of conducting further analysis to confirm (or otherwise) the presence of such substances, UK-EACL had subsequently reported

the Samples to HIWU as Negative without any confirmatory analysis being performed (the "Samples of Interest").[3]

The documentation received from UK-EACL raised questions about the positive controls used in screening by UK-EACL. Positive controls are required for each testing run. They are solutions verified to contain specific substances at documented concentrations. With each testing run, the laboratory instrument must recognize the substances in the positive control and at amounts within very tight parameters of the known concentrations. Failure to recognize even one of the substances in the positive control invalidates all testing results from that run, and the tests must be repeated. Further, the supplementation of positive controls with substances that are assigned Screening Limits in HISA's regulations, at those Screening Limit concentrations, permits decisive comparison of test Samples with the known positives in determining which Samples have substances present in concentrations that exceed the HISA Screening Limit and warrant confirmatory analysis.

In short, UK-EACL's process for screening the HISA/HIWU Samples was not in full compliance with the ADMC Program Rules or HIWU Testing Specifications and Instructions, and, in certain respects, was not conducted pursuant to appropriate scientific standards.

Given these discoveries, HIWU decided to have screening analysis performed again on A Samples in which UK-EACL had reportedly detected the presence of Prohibited Substances where those substances were subject to Screening Limits, even if that presence had been confirmed by another Program Laboratory's analysis of the corresponding B Sample. At the outset of the investigation, HIWU had already decided to have re-analysis conducted of those Samples where a positive A Sample result had not been confirmed by B Sample analysis.[4]

HIWU performed a reconciliation between the HISA/HIWU Samples shipped to UK-EACL, the Samples received by UK-EACL, and the Samples billed to HISA/HIWU by UK-EACL. A reconciliation was also completed for HISA/HIWU Samples retained in Long-Term Storage ("LTS") by UK-EACL and the actual instructions for LTS that HIWU gave to UK-EACL. The communications between HIWU and UK-EACL with respect to Sample deficiencies, Sample type, medications administered to Covered Horses and other relevant information were also reviewed.

After the initial review of relevant documentation, HIWU requested and received relevant screening data from UK-EACL relating to the 146 Samples of Interest that HIWU had identified. With this information, HIWU was able to identify Samples for which the failure to conduct confirmatory analysis was justified based upon the requirements of the ADMC Program (e.g., where screening indicated the potential presence in a Sample collected Out-of-Competition of a substance that is not prohibited Out-of-Competition). HIWU also determined that some of the 146 Samples had, in fact, been subjected to confirmatory analysis, with no Prohibited Substances being detected.

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[3]All samples submitted for drug testing undergo initial testing, referred to as screening analysis. Screening analysis examines each sample for hundreds of different substances and can make a presumptive identification of a prohibited substance. If a prohibited substance is presumptively identified pursuant to the applicable testing specifications, the sample should then be subjected to confirmatory analysis directed specifically at making an unequivocal determination as to whether the substance is present. This is all part of the A sample analysis process.

[4]During the investigation, HIWU did not discover any information that led to the conclusion that the targeted analysis required for B Sample analysis was a problem at UK-EACL. As a result, HIWU did not have the B Samples that UK-EACL received from other Program Laboratories re-analyzed.

Through this process, 55 Samples were excluded (as the failure to send them to confirmatory analysis was justified under the ADMC Program Rules or they had already been subjected to confirmatory analysis), and the list of the Samples of Interest was eventually reduced to 91 unique Samples. Thirty-six (36) of those 91 Samples were still in the possession of UK-EACL (while the 55 others had been already discarded in accordance with HIWU retention policies).

Before any of these Samples were sent for Further Analysis, HIWU confirmed the volume remaining in each Sample, verifying that adequate volume for both A and B Sample analysis remained. HIWU also reviewed the Sample Collection Documentation for these Samples to confirm that there were not deficiencies in the documentation that would preclude HIWU from pursuing any resulting AAF.

HIWU then distributed the 36 Samples across the remaining Program Laboratories for Further Analysis.

III. FINDINGS OF HIWU'S INVESTIGATION

Below are the relevant factual findings and conclusions reached by HIWU after the conclusion of its investigation:

A. UK-EACL Failed to Comply with HIWU Testing Requirements

1. Contrary to its express commitments to HIWU, UK-EACL's policies (e.g., SOPs) were never updated to reflect the regulations of the ADMC Program or HIWU's Testing Specifications and Instructions.

2. UK-EACL did not perform EPO testing on HISA/HIWU Samples in accordance with the HIWU Testing Specifications and Instructions. In fact, UK-EACL did not have a validated method for confirmation of EPO, and the equipment at UK-EACL that was supposed to be used for EPO testing was inoperable. Neither of these facts were disclosed to HIWU or HISA.

3. UK-EACL failed to follow the HIWU Testing Specification for methamphetamine and instead applied an outdated testing specification from a state program that was not applicable to the ADMC Program. Thus, there were Samples collected in the early months of the ADMC Program that may have had methamphetamine present in them, but Dr. Stanley directed staff not to subject these Samples to confirmatory analysis at that time, and they were no longer in the possession of UK-EACL when HIWU began its investigation. As a result, they could not be subjected to Further Analysis.

4. UK-EACL did not perform cobalt testing on HISA/HIWU Samples in accordance with the HIWU Testing Specifications and Instructions. Instead, UK-EACL made the unilateral decision to test for cobalt only on limited days per month and did not perform cobalt testing on Samples from all Racetracks from which UK-EACL received Samples. This did not comply with HIWU's express requirements.

5. UK-EACL failed to follow the HIWU Testing Specification when its screening analysis detected the potential presence of glaucine, a Banned Substance that is

also a Specific Substance,[5] in a Sample. (Numerous Samples were later subjected to Further Analysis for glaucine at HIWU's request, and it was determined that they were in fact Negative under the applicable HIWU Testing Specifications.)

6. UK-EACL disregarded the HIWU Testing Specification for triamcinolone, a Class C Controlled Medication Substance. UK-EACL reported as Negative a double-blind Sample from the RMTC that contained triamcinolone. Screening analysis of this Sample detected evidence for the substance in an amount that exceeded the screening decision level set by UK-EACL for confirmatory analysis. Dr. Stanley then made an arbitrary decision to instruct UK-EACL analysts not to perform confirmatory analysis on the Sample and instead reported the sample as Negative.

7. Screening of blood Samples collected from Covered Horses who were not eligible to receive furosemide detected evidence for furosemide at estimated concentrations in excess of the HIWU Screening Limit for the 48-hour prohibition, but these Samples were reported as Negative by UK-EACL without being subject to confirmatory analysis. (Further Analysis of these Samples at HIWU's request did not result in any AAFs for furosemide.)

B. Other UK-EACL Analytical and Operational Deficiencies

1. UK-EACL invoiced HISA/HIWU for numerous analyses of Samples that were not in fact performed by the laboratory, including analysis for both EPO (including the EPO Sample that Dr. Stanley had agreed to analyze but never even opened) and cobalt, even though, as noted above, UK-EACL was unable to analyze any samples for EPO, did not conduct any analysis for EPO, and did not test the required Samples for cobalt.

2. UK-EACL used arbitrary and unsubstantiated selection criteria to determine if certain analytes should be forwarded to confirmatory analysis, as they had no representation in the positive control stock sample (including, but not limited to, detomidine, butorphanol, xylazine, diclofenac, and omeprazole). Dr. Stanley alone made decisions as to whether to send Samples to confirmatory analysis, which were not in accordance with accepted scientific practices, regardless of the screening results reported by the UK-EACL analysts.

3. In violation of its Laboratory Ethics and Conflict of Interest Policy, an individual employed by UK-EACL was a close relative of a Covered Person and worked in a capacity where an external Sample number (routinely provided to the Responsible Person when a Sample is collected from a Covered Horse) could be linked to the internal laboratory sample code. While this represents an opportunity for sample manipulation, HIWU found no evidence that Samples collected from the Covered Person's horses were handled inappropriately.

[5]Specified Substances, which are Prohibited Substances that pose a higher risk of being present due to environmental contamination, are subject to the Atypical Findings Policy.

C. Further Analysis of HIWU Samples

After Further Analysis was completed of the 36 Samples of Interest, two Samples were confirmed as AAFs: a Post-Race Sample for a Class B Controlled Medication Substance; and a Vets' List Sample for a Class C Controlled Medication Substance. These AAFs will be processed under the ADMC Program, with Equine Controlled Medication ("ECM") Notices being sent shortly to the relevant Covered Persons. Under Rule 3323(c)(3), the Covered Person with the potential Class B Controlled Medication Rule Violation may be entitled to a reduction or elimination of their period of Ineligibility and/or fine for substantial delays in the adjudication process that were not the fault of the Covered Person. However, the Disqualification of results and assignment of penalty points are automatic under the ADMC Program, and HIWU has no authority to modify these Consequences. (HIWU will not seek reimbursement from the Owner of the Covered Horse, but will ensure that all Owners receive the accurate purse amounts.) As to the other potential AAF, the Covered Person is only subject to a Written Reprimand for their potential ECM Violation.

As to the screening of the AAFs originally reported by UK-EACL, after re-screening by other Program Laboratories, HIWU discovered that there were two AAFs that should not have been reported by UK-EACL because the Samples did not contain the relevant substance in an amount in excess of its Screening Limit.[6] There was one Post-Race Sample with an AAF for diclofenac,[7] and another Post-Race Sample with an AAF for phenylbutazone. HIWU recognizes that, given the time between the collection of these Samples and the performance of the Further Analysis, there could have been degradation of the Samples. However, HIWU believes that it is inequitable to maintain the Consequences of these two reported AAFs when Further Analysis could not confirm that the Prohibited Substances could be detected in the Samples above the applicable Screening Limits.[8] Therefore, HIWU will withdraw these cases and ensure that all relevant fines, costs and purses are returned to the relevant Covered Persons. Fortunately, neither of these Covered Persons was required to serve any suspension, so they will be made whole by the reimbursement of purse money and any related financial fines.

IV. ACTION ITEMS BASED UPON THE INVESTIGATION'S FINDINGS

The following actions have been taken or will be taken, as a result of the investigation's findings:

A. Additional Oversight of Laboratory Performance

To provide further assurance that the other Program Laboratories are in compliance with the ADMC Program requirements, HIWU has enhanced its Negative

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[6]Under the ADMC Program, "Screening Limit" is defined as "a concentration to be used by Laboratories when screening for certain Non-Threshold Substances during the Initial Testing Procedure, below which a Laboratory *will not pursue* the possible presence of a Prohibited Substance" (emphasis added).
[7]The two other diclofenac AAFs from urine Samples analyzed by UK-EACL are the subject of a pending case currently before the FTC. That case will be dismissed by HIWU.
[8]It should be noted that, while the identified substances were, in fact, detected in these two Samples, the estimated amount detected was below the Screening Limit set forth in the Prohibited List—Technical Document, and, therefore, they should not be pursued as Presence violations.

Sample Exchange Program among the Program Laboratories, now a monthly round-robin program in which Negative Samples are circulated and screened by the Laboratories, and is continuing its efforts to improve and harmonize the Laboratory Documentation Packages it provides. HIWU has worked to ensure that all necessary information is included in the Laboratory Documentation Packages, which are reviewed by the HIWU Science department before they are finalized and submitted to the applicable Responsible Person.

HIWU is also preparing to implement HEAL accreditation on January 1, 2025, which will include stricter compliance oversight by HIWU and a more robust Equine Quality Assurance Scheme ("EQAS") sample program. HEAL accreditation (which will also involve participation of an independent Laboratory Expert Group) will give HIWU a strengthened ability to ensure strict compliance by all Program Laboratories with all ADMC Program requirements. (Currently, in a transitional phase permitted in the ADMC Program Rules, accreditation for the Program Laboratories is handled by the RMTC.)

Under the ADMC Program Rules, the EQAS is designed to monitor the capabilities of the Program Laboratories, to evaluate their proficiency, and to facilitate uniformity across the Program Laboratories. EQAS Samples will be used to assess a Laboratory's routine analytical capacity and performance, reporting turn-around times, and overall compliance with the Laboratory Standards, as well as other, non-analytical performance criteria. Under the EQAS, single-blind and double-blind samples are sent to Program Laboratories for analysis, with at least 15 single-blind samples and at least five (5) double-blind samples distributed annually, including samples containing Threshold Substances. HIWU will endeavor to distribute more than the minimum number of EQAS Samples annually.

B. Request for Re-Payment from the University of Kentucky

In July, HISA sought repayment of monies paid for services that were never actually provided by UK-EACL from the University of Kentucky since HISA/HIWU Samples were not analyzed in full compliance with the requirements of the ADMC Program, in breach of the clear commitments made to both HIWU and HISA. Specifically, UK-EACL failed to follow HIWU Testing Specifications and Instructions, failed to analyze HISA/HIWU Samples for the required test menu of substances, and failed to update its SOPs to conform with the ADMC Program.

C. The Investigation Remains Open

The goals of HIWU's investigation of the performance of UK-EACL were to protect the integrity of the ADMC Program process, the interests of Covered Persons, and the welfare of Covered Horses. As a result, HISA and HIWU consider this investigation to be an open one for the foreseeable future. All available evidence has been secured for this purpose, and additional action may be taken by HISA and/or HIWU in the future in connection with this matter.