

Our criminal-law experts (including former federal and state prosecutors and white-collar criminal defense attorneys) confirm that were this activity to come to the attention of authorities, it would be zealously investigated and prosecuted, and would likely be a high-profile case attracting media attention to Mr. Venning as well as the Company. Additional aggravating factors include the Company's core mission of philanthropy, and the fact that parents are asked to entrust their children to this Company's care. Mr. Venning's alleged behavior, and its focus on young employees (even if they all happen to be over 18 so far) suggests that the risk of criminal investigation is serious, even if it has not yet occurred, which would subject Mr. Venning and the Company to serious legal exposure and scandal.⁴⁹

Section 1591 imposes penalties of a minimum of 15 years in prison as well as a fine. The statute of limitations for prosecution of these claims is ten years.