

## Treat Investigation Search Term List as Work Product

Internal investigators and their in-house clients are familiar with having to explain their investigative methodology to the client's outside auditors or government regulatory and enforcement agencies like the DOJ and SEC. In this [Law360\\* article](#), Markus Funk and Chelsea Curfman hope to sensitize—and perhaps even persuade—the reader that lawyers' prevailing practice of, often without as much of a second thought, handing over internal investigation search term lists to outside auditors and government regulators and enforcers puts their client's privilege arguments at risk.

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### Authors



#### [T. Markus Funk Ph.D.](#)

Partner

[MFunk@perkinscoie.com](mailto:MFunk@perkinscoie.com) [303.291.2371](tel:303.291.2371)



#### [Chelsea Curfman](#)

Partner

[CCurfman@perkinscoie.com](mailto:CCurfman@perkinscoie.com) [303.291.2300](tel:303.291.2300)

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