



Report of Investigation

U.S. Department of Housing
and Urban Development
Office of Inspector General
Office of Investigation

File Number:

2014SI0001671I

District/Office:

Special Investigations Division (SID), Washington, DC

Title:

(b) (7)(C) / (b) (7)(C)

U.S. Department of Housing and Urban Development (HUD)
Office of Inspector General (OIG)

(b) (7)(C)

(b) (7)(C)

Narrative:

BASIS FOR INVESTIGATION:

On September 23, 2014, SID initiated an investigation as a result of a referral of information received from (b) (7)(C), HUD, OIG, (b) (7)(C) advised that on September 16, 2014 (b) (7)(C) (b) (7)(C) related that according to the letter, (b) (7)(C) (b) (7)(C) in unpaid income tax, and required that (b) (7)(C)

POTENTIAL VIOLATIONS:

Potential Criminal Violations –

- Title 18 U.S. Code §1001 – False Statements
- Title 26 Internal Revenue Code §7203 – Failure to File Return, Supply Information, or Pay Tax

(b) (7)(C)

Special Investigations Division

Special Investigations Division

Date:

March 18, 2015

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Previous Editions Obsolete

OIGM 3000 Appendix 14a

HUD-1408(12-95)

(b) (7)(C) (b) (7)(C)

Potential Administrative Violations –

- (b) (7)(C)
- Page 24 – DWI/DUI in POV while off duty
 - Page 25 – Arrest/indictment/conviction, misdemeanor or felony, Federal or State, also failure to report arrest/indictment/conviction, misdemeanor and felony, Federal or State
 - Page 25 – Failure to meet personal financial obligations
 - Page 27 – Failure to pay/file income tax – Federal or State (without obtaining an extension)
 - Page 27 – Falsification, misstatement, or concealment of material fact in connection with any official record, including investigative and audit activity or reporting
 - Page 28 – Lying under oath

RESULTS OF INVESTIGATION:

The investigation revealed that (b) (7)(C) has had a lengthy history of failing to meet her personal financial obligations, to include failing to timely file and pay (b) (7)(C) Federal and state personal income taxes. This investigation also revealed that (b) (7)(C) has had a history of failing to fully and truthfully disclose the nature and extent of her poor financial history, and (b) (7)(C) criminal history record. Further, when interviewed by SID regarding (b) (7)(C) financial and criminal history, (b) (7)(C) deliberately provided responses which were intended to evade and/or conceal the truth.

Additionally, the investigation revealed that (b) (7)(C) has been verbally counseled and/or has received written disciplinary action relative to (b) (7)(C) failure to timely complete and submit (b) (7)(C) background re-investigation paperwork, as well as for failing to meet the requirements and responsibilities of a Government Purchase Card (GPC) holder.

(b) (7)(C), (b) (5)

(b) (7)(C) declined prosecution of (b) (7)(C) as HUD-OIG could address (b) (7)(C) conduct through agency administrative remedies.

DETAILS OF INVESTIGATION:

On (b) (7)(C) (b) (7)(C) as HUD-OIG's servicing personnel office, (b) (7)(C) during the period of (b) (7)(C) employment with HUD, (b) (7)(C) (Exhibit 2). A review of the information provided revealed that during (b) (7)(C) employment with

¹ Review of (b) (7)(C) Official Personnel File disclosed that (b) (7)(C)

HUD-OIG, (b) (7)(C) provided the following information regarding (b) (7)(C):

(b) (7)(C), (b) (6)

On (b) (7)(C) most recent background re-investigation (2014) (Exhibit 3). Review of the documentation reflected a Certification of Investigation documenting that (b) (7)(C) most recent background investigation was conducted and closed on June 27, 2014. Additionally, the background investigation was adjudicated favorable for suitability/fitness under 5 Code of Federal Regulations 731 or equivalent on August 27, 2014, by (b) (7)(C) HUD, OIG, (b) (7)(C) an adjudication recommendation made (b) (7)(C).

The adjudication recommendation (b) (7)(C) background re-investigation developed suitability and security issues/concerns relative (b) (7)(C) financial responsibility. Specifically, (b) (7)(C) credit report reflected (b) (7)(C) with an unknown disposition; (b) (7)(C) which was satisfied in August 2010; nine collection accounts, of which five were satisfied and four remained open; two accounts that were up to 90 days delinquent four times with zero balances; (b) (7)(C) with a zero balance; one account that was 180 days past due and charged off; and fifteen accounts paid as agreed.

Included with the documentation provided (b) (7)(C) was a copy of the Standard Form 85P, Questionnaire for Public Trust Positions (SF 85P), completed and submitted by (b) (7)(C) (b) (7)(C) certified on the SF 85P that in the last seven years (b) (7)(C) or a company over which (b) (7)(C) exercised some control, had not filed (b) (7)(C) (b) (7)(C) Further, (b) (7)(C) certified that (b) (7)(C) was not over 180 days delinquent on any loan or financial obligation.

Further, (b) (7)(C) certified on the SF 85P that in the last seven years she had not been arrested for, charged with, or convicted of any offense, excluding traffic fines of less than \$150.00.

On (b) (7)(C) 2008 background re-investigation (Exhibit 4). The documentation concerning (b) (7)(C) 2008 re-investigation contained information relative (b) (7)(C) background re-investigation in 2002. Review of the documentation reflected a Certification of Investigation documenting that (b) (7)(C) 2008 re-investigation was conducted and closed on May 21, 2008.

(b) (7)(C) (b) (7)(C)

noting that (b) (7)(C) was counseled and/or a letter of warning/advisement or reprimand was issued to (b) (7)(C) based on (b) (7)(C) 2008 background investigation results.

(b) (7)(C) also provided a copy of the SF 85P (b) (7)(C) completed and signed on May 15, 2007 relative to (b) (7)(C) 2008 background re-investigation. Included with the SF 85P was an attached OPM personal subject interview report. The OPM personal subject interview report reflected that (b) (7)(C) was interviewed by the background investigator at HUD, Washington, D.C., on March 27, 2008.

The personal subject interview report reflected that when interviewed regarding (b) (7)(C) financial background, (b) (7)(C) provided additional information regarding debts (b) (7)(C) included, and did not include, when (b) (7)(C) completed the SF 85P. During the personal interview, (b) (7)(C) attributed (b) (7)(C) financial problems to a lack of proper attention on (b) (7)(C) part, and also due to financial emergencies in (b) (7)(C). (b) (7)(C) stated (b) (7)(C) recognized that (b) (7)(C) had failed to properly handle (b) (7)(C) financial responsibilities and did not intend to let the problems reoccur.

The personal subject interview report also reflected that when interviewed regarding (b) (7)(C), (b) (7)(C) provided additional details regarding (b) (7)(C). (b) (7)(C) stated that (b) (7)(C) was driving on the freeway, fell asleep and drove off the road. (b) (7)(C) advised (b) (7)(C). (b) (7)(C) stated there was (b) (7)(C). (b) (7)(C) advised that (b) (7)(C). (b) (7)(C) stated there were no other (b) (7)(C).

On September 25 and 26, 2014, SID conducted an (b) (7)(C). The query identified the following records in part:

1. (b) (7)(C)
2. (b) (7)(C)
3. (b) (7)(C)

(b) (7)(C) (b) (7)(C)

4. (b) (7)(C)
5. (b) (7)(C)
6. (b) (7)(C)
7. (b) (7)(C)

On September 26, 2014, SID obtained (b) (7)(C) Of particular interest was documentation obtained (b) (7)(C) reflects the case was related (b) (7)(C) (b) (7)(C)

On November 4, 2014, (b) (7)(C) was interviewed by SID regarding (b) (7)(C) and provided the following information (Exhibit 7). (b) (7)(C) HUD-OIG (b) (7)(C) has known (b) (7)(C) as a HUD-OIG co-worker for a much longer period.

(b) (7)(C) during the period (b) (7)(C) (b) (7)(C) has demonstrated an overall lack of responsiveness and timeliness in carrying out and completing assignments. Additionally, (b) (7)(C) noted there have been issues raised related (b) (7)(C) use of the GPC issued (b) (7)(C) as well as an issue related (b) (7)(C) failure to timely complete and submit (b) (7)(C) background re-investigation paperwork. (b) (7)(C) have counseled (b) (7)(C) verbally and in writing on a number of occasions concerning these matters.

Relative to (b) (7)(C) use of the GPC, (b) (7)(C) noted that in 2013, HUD's (b) (7)(C) Washington, D.C., (the program office

(b) (7)(C) (b) (7)(C)

responsible for overseeing and administering HUD's Government Purchase Card Program (GPCP)) raised a number of issues and concerns regarding (b) (7)(C) overall lack of accountability and responsibility as a GPC holder.

(b) (7)(C) that since 2013, the GPC issued to (b) (7)(C) has been suspended by the GPCP office on at least two occasions. (b) (7)(C) that both (b) (7)(C) have verbally counseled (b) (7)(C) regarding the use of (b) (7)(C) GPC as the issues arose.

(b) (7)(C) in approximately mid-2013 HOD learned that the GPCP office conducted a review of transactions posted (b) (7)(C) GPC and identified questionable and/or fraudulent transactions. (b) (7)(C) noted a report issued by the GPCP office concerning their review raised a number of concerns and issues regarding (b) (7)(C) participation as a GPC holder, and particularly troubling were the two transactions which were identified as fraudulent. (b) (7)(C) one fraudulent transaction was a Macy's.com transaction on May 2, 2013, for an Estee Lauder purchase totaling \$183.12, and the second was a fraudulent transaction for the re-load of a large number of Starbucks Coffee cards in late January 2014 totaling almost \$3,000.00.

(b) (7)(C) after learning of the GPCP office review and the two fraudulent transactions, (b) (7)(C) spoke with (b) (7)(C) and specifically asked (b) (7)(C) about the two fraudulent transactions. (b) (7)(C) that (b) (7)(C) stated (b) (7)(C) had no involvement with, or information concerning, either transaction. (b) (7)(C) that HOD attempted to determine whether (b) (7)(C) had any involvement with the Macy's.com transaction however, the efforts did not yield any evidence connecting (b) (7)(C) to the transaction.

(b) (7)(C) provided a copy of the report prepared by the GPCP office documenting their review and all of their concerns and issues regarding (b) (7)(C) participation as a GPC holder.

Review of the report reflected that (b) (7)(C) was established as a GPC holder on September 28, 2010, in Baltimore, Maryland, and on June 6, 2012, (b) (7)(C) was established as a HUD Headquarters GPC holder. The report noted concern over the fact that since June 2012, (b) (7)(C) had been issued four replacement cards. The report further reflected that the review identified transactions which were either questioned or unauthorized, and overall GPCP personnel were concerned because:

1. (b) (7)(C) had failed to communicate with GPCP personnel regarding lost/stolen/compromised cards on four occasions.
2. (b) (7)(C) had demonstrated a lack of accountability and responsibility as to her role as a GPC holder.
3. (b) (7)(C) had demonstrated a failure to follow established GPCP policies and procedures.
4. (b) (7)(C) transaction history reflected a number of declined transactions and fraudulent transactions.

(b) (7)(C) (b) (7)(C)

The report also noted that (b) (7)(C) neglected to timely file an affidavit, despite being sent the affidavit paperwork twice by Citi Bank, relative to fraudulent charge transactions for the Starbucks card reloads in January 2014.

The report further reflected that in January 2014, the GPCP office postponed the issuance of a replacement GPC to (b) (7)(C) pending a meeting with (b) (7)(C) to discuss the GPCP office's continued concerns. Further, the report reflects that the GPCP office stipulated that if the identified concerns were not addressed and corrected, (b) (7)(C)'s GPC account would be closed. In addition, the GPCP office noted they recommended that HOD select another employee to replace (b) (7)(C) as the GPC holder.

(b) (7)(C) in approximately February 2014, (b) (7)(C) met with GPCP personnel to discuss their concerns and (b) (7)(C) role and responsibility as a cardholder. (b) (7)(C) that the GPCP office refused to issue (b) (7)(C) a replacement GPC until (b) (7)(C) met with them.

(b) (7)(C) in late July 2014, after (b) (7)(C) required (b) (7)(C) to relinquish the GPC issued (b) (7)(C). (b) (7)(C) relinquished (b) (7)(C).

Relative (b) (7)(C) was made aware of it after (b) (7)(C) who received and processed (b) (7)(C) had not been able to contact (b) (7)(C) regarding the matter. (b) (7)(C) with and learned from (b) (7)(C) HUD, OIG, (b) (7)(C) that (b) (7)(C) had attempted on numerous occasions to contact (b) (7)(C) regarding (b) (7)(C) that after (b) (7)(C) was unable to contact (b) (7)(C) (b) (7)(C) contacted (b) (7)(C) to assist in contacting (b) (7)(C) (b) (7)(C) that in turn (b) (7)(C) attempted to contact (b) (7)(C) telephonically and left messages on a number of occasions, but (b) (7)(C) failed to return any of (b) (7)(C) calls. (b) (7)(C) that after (b) (7)(C) was unable to contact (b) (7)(C) (b) (7)(C) in an attempt to get in touch with (b) (7)(C).

(b) (7)(C) that subsequently, and after further consideration, a decision was made (b) (7)(C) issued GPC. (b) (7)(C) that on October 2, 2014, (b) (7)(C) a memorandum to (b) (7)(C) advising (b) (7)(C) that the GPC was suspended because HUD-OIG, had (b) (7)(C) (b) (7)(C).

(b) (7)(C) that on October 2, 2014, (b) (7)(C) (b) (7)(C) and issued (b) (7)(C) the counseling memorandum, and discussed the matter with (b) (7)(C) that during the meeting, (b) (7)(C) that (b) (7)(C) and the matter was a mistake. (b) (7)(C) (b) (7)(C) had made a mistake. (b) (7)(C) that (b) (7)(C) said that (b) (7)(C) (b) (7)(C) Further, (b) (7)(C) that (b) (7)(C) advised that because (b) (7)(C) (b) (7)(C) for those years. (b) (7)(C) also believed (b) (7)(C) said that (b) (7)(C) since 2006.

(b) (7)(C) (b) (7)(C)

(b) (7)(C) in addition to the issues and concerns regarding (b) (7)(C) GPC transaction history, (b) (7)(C) also failed to timely file the paperwork required to initiate (b) (7)(C) background re-investigation. (b) (7)(C) that on June 24, 2014, (b) (7)(C) issued a counseling memorandum to (b) (7)(C) for failure to timely follow instructions and complete and submit (b) (7)(C) background re-investigation paperwork. (b) (7)(C) (b) (7)(C) was originally required to complete and submit (b) (7)(C) re-investigation paperwork in May 2013, but despite repeated requests to do so, (b) (7)(C) did not complete and submit the paperwork until May 2014.

(b) (7)(C) that (b) (7)(C) (b) (7)(C) failure to timely complete and file (b) (7)(C) background re-investigation paperwork, as well as (b) (7)(C) failure to respond to (b) (7)(C) repeated attempts to contact (b) (7)(C) regarding (b) (7)(C) had caused a lot of unnecessary work and inconvenience for (b) (7)(C) personnel which could have been avoided.

On November 6, 2014, (b) (7)(C) was interviewed by SID (Exhibit 8). (b) (7)(C) that (b) (7)(C) has been (b) (7)(C) within HOD (b) (7)(C) that (b) (7)(C) during the period.

(b) (7)(C) that based on statements made to (b) (7)(C) (b) (7)(C) believes (b) (7)(C) (b) (7)(C) that (b) (7)(C) recently reviewed a travel voucher (b) (7)(C) submitted and noticed the voucher reflected (b) (7)(C) asked (b) (7)(C) why the voucher reflected the (b) (7)(C) and (b) (7)(C) advised that (b) (7)(C) never updated (b) (7)(C) address within the travel system after (b) (7)(C)

(b) (7)(C) that during the period (b) (7)(C) (b) (7)(C) there have been issues with (b) (7)(C) attention to detail, attendance, and lack of responsiveness when (b) (7)(C) teleworks. (b) (7)(C) that (b) (7)(C) have also verbally counseled (b) (7)(C) and issued written counseling (b) (7)(C) concerning issues related to the GPC issued to (b) (7)(C) failure to complete and file background re-investigation paperwork, and (b) (7)(C)

(b) (7)(C) that (b) (7)(C) is aware that the HUD program office responsible for overseeing and administering the GPCP has raised concerns relative to the GPC issued to (b) (7)(C) in approximately August 2013, the GPCP office advised HOD of a review they (GPCP) conducted of purchase transactions charged (b) (7)(C) GPC. (b) (7)(C) noted in particular, the GPCP office questioned a Macy's transaction.

(b) (7)(C) that after learning of the GPCP office review, and in particular their concern over the Macy's transaction, (b) (7)(C) met with and verbally counseled (b) (7)(C) and specifically asked (b) (7)(C) about the Macy's transaction. (b) (7)(C) that (b) (7)(C) stated (b) (7)(C) had no knowledge or involvement with the transaction.

In addition to the Macy's transaction, (b) (7)(C) noted in January 2014, the GPCP office raised a concern regarding transactions posted (b) (7)(C) GPC relative to the re-load of Starbucks coffee cards. (b) (7)(C) spoke to (b) (7)(C) about the Starbucks card reloads and (b) (7)(C) (b) (7)(C) did not have any knowledge or involvement with the transactions. (b) (7)(C) in addition

(b) (7)(C) (b) (7)(C)

to the issues concerning the GPC issued (b) (7)(C) in approximately May or June 2014, an issue concerning (b) (7)(C) failure to timely complete and file the paperwork required to initiate background re-investigation surfaced. (b) (7)(C) that based on (b) (7)(C) failure to timely complete and file the background re-investigation paperwork (b) (7)(C) was issued a counseling memorandum.

(b) (7)(C) in addition, in August 2014 (b) (7)(C) (b) (7)(C) against (b) (7)(C) (b) (7)(C) (b) (7)(C) a counseling memorandum was issued to (b) (7)(C) in October 2014, and the GPC account for the card issued to (b) (7)(C) was suspended.

(b) (7)(C) met with (b) (7)(C) to issue the October 2014 counseling memorandum they discussed (b) (7)(C) during the meeting (b) (7)(C) stated that the matter was a misunderstanding. (b) (7)(C) recollection was that (b) (7)(C) stated (b) (7)(C) did not owe the amount reflected, or (b) (7)(C) did not owe as much as the amount reflected. (b) (7)(C) (b) (7)(C) told (b) (7)(C) was addressing the matter, that it was not what it appeared to be, and that (b) (7)(C) and was working it out with them.

On December 11, 2014, staff members from COB were contacted and interviewed by SID regarding (b) (7)(C) and (b) (7)(C) as a GPC holder (Exhibit 9). During December 2014 and February 2015, COB staff also provided documentation regarding (b) (7)(C) history as a GPC holder (Exhibit 10).

When interviewed, the COB staff members advised that (b) (7)(C) had been a GPC holder since approximately October 2010, and generally over the period (b) (7)(C) had consistently demonstrated a lack of accountability relative to (b) (7)(C) role and responsibilities as a card holder. The COB staff members further advised that as a GPC holder, (b) (7)(C) has had a history of failing to communicate with COB staff concerning lost or compromised cards, and (b) (7)(C) has failed to follow established GPC policies and procedures. The COB staff members advised that they had reached such a level of alarm over (b) (7)(C) attitude and disregard for GPC policies and procedures, that in January 2014, they refused to re-issue (b) (7)(C) a new GPC pending (b) (7)(C).

The COB staff noted (b) (7)(C) had to be re-issued a new card, because in January 2014 (b) (7)(C) account was compromised after the card was used to make fraudulent Starbuck coffee card re-load purchases via the Internet totaling \$2,940.00. The COB staff noted that (b) (7)(C) never advised their office of the fraudulent charges, and once they learned of the charges and contacted (b) (7)(C) (b) (7)(C) was evasive in answering their questions regarding the compromise and would only state that (b) (7)(C) did not make any of the purchases and the card was locked in (b) (7)(C) drawer. The COB staff noted what was even more distressing was that (b) (7)(C) failed to timely file an affidavit with Citibank regarding the charges within the 60-day dispute period, and only filed the affidavit in April 2014 after Citibank forwarded the affidavit forms to (b) (7)(C) twice and (b) (7)(C) was "prodded" by COB to do so. The COB staff noted that after (b) (7)(C) forwarded the affidavit, the \$2,940.00 was eventually credited back to HUGHLETT's GPC account.

(b) (7)(C) (b) (7)(C)

The COB staff members noted that based on their refusal to re-issue (b) (7)(C) a new GPC, in approximately February 2014, (b) (7)(C) with them to discuss their issues and concerns. The COB staff members advised that during the meeting, they attempted to impress upon (b) (7)(C) to ensure that (b) (7)(C) took a more active role in monitoring (b) (7)(C)'s GPC activity. The COB staff members noted that after the meeting they authorized the re-issue of a new GPC for (b) (7)(C) but they made it clear during their meeting (b) (7)(C) that they questioned whether (b) (7)(C) should continue to be a GPC holder, and suggested (b) (7)(C) that the responsibility be delegated to someone else.

The COB staff members advised that in addition to the fraudulent Starbucks coffee card re-loads, the GPC issued to (b) (7)(C) was also used for a fraudulent purchase of merchandise from Macy's Department Store, and (b) (7)(C) also failed to notify COB of this fraudulent transaction. The COB staff members advised when they identified the fraudulent transaction and contacted (b) (7)(C) attitude was not cooperative or forthcoming.

On January 5, 2015, (b) (7)(C) was interviewed by SID (Exhibit 11). (b) (7)(C) advised that (b) (7)(C) that from sometime in 2006 through sometime in 2011, (b) (7)(C) (b) (7)(C) (b) (7)(C) stated prior (b) (7)(C)

(b) (7)(C) was asked about (b) (7)(C) (b) (7)(C) stated (b) (7)(C) (b) (7)(C) stated (b) (7)(C) was in "error" and (b) (7)(C) "straighten the matter out." (b) (7)(C) stated (b) (7)(C) (b) (7)(C) (b) (7)(C)

(b) (7)(C) stated after contacting (b) (7)(C) (b) (7)(C) (b) (7)(C) advised before (b) (7)(C) When asked if (b) (7)(C) had been in error as (b) (7)(C) stated, (b) (7)(C) did not provide a clear answer and stated (b) (7)(C) was not sure how the matter was going to be resolved.

(b) (7)(C) advised that (b) (7)(C) could not recall all of the specifics regarding everything that had taken place in recent months relative (b) (7)(C) documentation and/or notes for reference. When asked why (b) (7)(C) had not brought the documentation with (b) (7)(C) for the interview, initially (b) (7)(C) stated that (b) (7)(C) did not know (b) (7)(C) needed to bring the documentation. (b) (7)(C) was reminded that when the interview was scheduled with (b) (7)(C) had specifically been asked to bring any documentation and information (b) (7)(C) had concerning (b) (7)(C) (b) (7)(C) advised (b) (7)(C) did not recall being asked to do so, but stated (b) (7)(C) would provide any documentation needed at a later date.

(b) (7)(C) (b) (7)(C)

(b) (7)(C) was ambiguous regarding when s^{(b) (7)(C)} first received (b) (7)(C) regarding the (b) (7)(C) (b) (7)(C) (b) (7)(C) in approximately February or March 2014, but s^{(b) (7)(C)} was vague regarding when s^{(b) (7)(C)} received that correspondence. (b) (7)(C) was also vague regarding when s^{(b) (7)(C)} to address the matter. (b) (7)(C) stated that s^{(b) (7)(C)} had been speaking with auditors (b) (7)(C) for approximately the "last six months or so."

(b) (7)(C) stated the confusion regarding (b) (7)(C) (b) (7)(C) (b) (7)(C) (b) (7)(C) stated s^{(b) (7)(C)} was not fully aware of this fact (b) (7)(C) (b) (7)(C)

(b) (7)(C) (b) (7)(C) and had recommended (b) (7)(C) (b) (7)(C) (b) (7)(C) (b) (7)(C)

(b) (7)(C) s^{(b) (7)(C)} the last time s^{(b) (7)(C)} (b) (7)(C) at which time s^{(b) (7)(C)} (b) (7)(C) after their February 2007 conversation s^{(b) (7)(C)} "just assumed" (b) (7)(C) (b) (7)(C) stated at some point after the February 2007 conversation, (b) (7)(C) by telephone to determine whether s^{(b) (7)(C)} but when (b) (7)(C) had left the area. (b) (7)(C) after learning (b) (7)(C) (b) (7)(C) had left the area s^{(b) (7)(C)} did not follow-up any further, and the matter did not come up again until (b) (7)(C) in 2014. (b) (7)(C) stated the fact that s^{(b) (7)(C)} did not follow-up further reflected "negligence" on s^{(b) (7)(C)} part, and s^{(b) (7)(C)} should have addressed the matter further, but did not.

In explaining the circumstances that led to the confusion concerning (b) (7)(C) (b) (7)(C) provided information which addressed (b) (7)(C) (b) (7)(C) did not provide any information regarding when, or in what (b) (7)(C)

(b) (7)(C) was questioned further regarding the status of (b) (7)(C) (b) (7)(C) however, throughout the interview s^{(b) (7)(C)} was generally vague, or provided conflicting information. When questioned, (b) (7)(C) generally stated that s^{(b) (7)(C)} could not recall specifics without referencing s^{(b) (7)(C)} documentation and/or notes. (b) (7)(C) again stated that s^{(b) (7)(C)} would provide whatever documentation s^{(b) (7)(C)} at a later date.

In an attempt to clarify and understand the status of (b) (7)(C) (b) (7)(C) (b) (7)(C) was provided with a piece of paper and asked to note the date (b) (7)(C) (b) (7)(C) as well as the date (b) (7)(C) (b) (7)(C)

(b) (7)(C) (b) (7)(C)

The information provided by (b) (7)(C) is summarized below:

(b) (7)(C), (b) (6)

After providing the above information, (b) (7)(C) was questioned regarding (b) (7)(C). (b) (7)(C) stated (b) (7)(C) due to "personal reasons." (b) (7)(C) stated that some of the personal reasons related to family deaths and depression (b) (7)(C) subsequently suffered, the (b) (7)(C) as well as financial issues and hardships. (b) (7)(C) stated (b) (7)(C) returns was due to "negligence" on (b) (7)(C) part. (b) (7)(C) stated (b) (7)(C) recognized (b) (7)(C) had a responsibility (b) (7)(C) but had failed to do so.

(b) (7)(C) was asked if (b) (7)(C) provided inconsistent and/or contradictory information. When asked if (b) (7)(C) (b) (7)(C) stated, "I don't think so." (b) (7)(C) then stated that "maybe" (b) (7)(C) but (b) (7)(C) possibly" paid the amount owed, but had not paid it timely. (b) (7)(C) noted that (b) (7)(C) because (b) (7)(C) but (b) (7)(C) could not recall the exact details and (b) (7)(C) believed (b) (7)(C) at some point.

Upon further questioning, (b) (7)(C) commented that (b) (7)(C)

(b) (7)(C) (b) (7)(C)

(b) (7)(C) or some (b) (7)(C)

(b) (7)(C) was asked if (b) (7)(C)
 and (b) (7)(C) stated "no."

(b) (7)(C) was provided with a copy of the SF 85P (b) (7)(C) completed and submitted electronically on May 16, 2014. (b) (7)(C) attention was directed to pages four and five of the document, (b) (7)(C) (b) (7)(C) financial record, which read:

a. (b) (7)(C)

(b) (7)(C) acknowledged that (b) (7)(C) responded "no" to each of the above questions when (b) (7)(C) completed and submitted the form, and (b) (7)(C) stated (b) (7)(C) answered the questions truthfully.

(b) (7)(C) was provided a chart reflecting (b) (7)(C) as a HUG-OIG employee. (b) (7)(C) was also provided with a copy of (b) (7)(C) credit report which was obtained on June 16, 2014, by the U.S. Office of Personnel Management (OPM) as part of (b) (7)(C) employment suitability re-investigation as conducted by OPM based on the SF 85P (b) (7)(C) completed and submitted electronically on May 16, 2014.

(b) (7)(C) attention was directed to the chart pertaining (b) (7)(C) (b) (7)(C) (b) (7)(C)

1. (b) (7)(C) (b) (7)(C)
2. (b) (7)(C) (b) (7)(C)
3. (b) (7)(C) (b) (7)(C)

When asked why (b) (7)(C) did not (b) (7)(C) when (b) (7)(C) completed and submitted the SF 85P on May 16, 2014, (b) (7)(C) initially stated (b) (7)(C) was not aware (b) (7)(C). After further questioning, (b) (7)(C) acknowledged (b) (7)(C) had been aware of the (b) (7)(C) (b) (7)(C) completed the SF 85P in May 2014. (b) (7)(C) stated although (b) (7)(C) did not intentionally fail to provide the information, and (b) (7)(C) "just forgot" to disclose the information when (b) (7)(C) completed the form.

(b) (7)(C) (b) (7)(C)

(b) (7)(C) stated to the best of (b) (7)(C) once held.
 (b) (7)(C) stated that (b) (7)(C)
 respectively.

When asked why (b) (7)(C) stated that at the time (b) (7)(C) completed and submitted the SF 85P, (b) (7)(C) completed and submitted the form. (b) (7)(C) stated to the best of (b) (7)(C) further pointed out that after addressing the alleged (b) (7)(C)

(b) (7)(C) attention was directed to the information obtained regarding (b) (7)(C) credit history as disclosed in the credit report obtained by OPM on June 16, 2014. Specifically, the following judgments, collection actions, or accounts over 180 days delinquent, were reviewed with (b) (7)(C) and (b) (7)(C) provided the following information regarding each:

1. (b) (7)(C) (page 5 of the credit report).
 (b) (7)(C) stated to the best of (b) (7)(C) knowledge the judgment related (b) (7)(C) (b) (7)(C) (b) (7)(C) stated (b) (7)(C) could not explain the discrepancy between the judgment amount reflected in the credit report versus the amount (b) (7)(C)
2. A collection action (b) (7)(C) (page 5 of the credit report).
 (b) (7)(C) stated (b) (7)(C) believed the collection action related to medical bills related to the (b) (7)(C) (b) (7)(C) stated (b) (7)(C) did not pay the amount, and (b) (7)(C) disputed the bill with (b) (7)(C) (b) (7)(C) advised that (b) (7)(C) should have covered the costs (b) (7)(C) (b) (7)(C) stated (b) (7)(C) they refused to cover the costs, because (b) (7)(C) did not add (b) (7)(C) insurance policy until a few weeks after (b) (7)(C) (b) (7)(C) made conflicting statements regarding this collection action. At one point (b) (7)(C) stated (b) (7)(C) refused to pay the bill and acknowledged (b) (7)(C) was aware of the collection action, and on another occasion (b) (7)(C) paid the bill.
3. A collection action (b) (7)(C) for a loan which had been charged off in the amount of \$161.00, with a last reported delinquency of July 2011, and (b) (7)(C) for an (b) (7)(C) with a last reported delinquency of April 2014, and being delinquent 180 days past due (page 8 of the credit report).

(b) (7)(C) (b) (7)(C)

(b) (7)(C) stated (b) (7)(C) believed that both of the above collection (b) (7)(C) were related to two loans (b) (7)(C) (b) (7)(C) stated (b) (7)(C) obtained the first (b) (7)(C) (b) (7)(C) in order to help pay costs associated with a family funeral. (b) (7)(C) stated (b) (7)(C) obtained the second loan in an amount in excess of \$11,800.00 in an attempt to consolidate (b) (7)(C) debts. (b) (7)(C) acknowledged (b) (7)(C) was aware (b) (7)(C) in order to collect on both loans. (b) (7)(C) advised that (b) (7)(C) retained an attorney to represent (b) (7)(C) in the matter, and (b) (7)(C) attended a court hearing relative to the matter, possibly in 2007. (b) (7)(C) advised that at the hearing the judge ruled against (b) (7)(C) and (b) (7)(C) although (b) (7)(C) could not recall the amount the court ordered (b) (7)(C) to pay relative to each judgment.

(b) (7)(C) provided conflicting information regarding the above two loans and resulting judgments. (b) (7)(C) states were inconsistent, and at one point (b) (7)(C) stated (b) (7)(C) in order to collect the delinquent loan amounts.

4. A collection action (b) (7)(C) in the amount of \$219.00, with a last reported delinquency of September 2011 (page 9 of the credit report).

(b) (7)(C) stated (b) (7)(C) believed (b) (7)(C) had paid this outstanding debt, and (b) (7)(C) did not recall the debt being referred to collection.

5. A collection action by (b) (7)(C) (b) (7)(C) originally for (b) (7)(C) last reported delinquent on August 2013 (page 10 of the credit report).

(b) (7)(C) stated (b) (7)(C) was not aware of this collection action and could not provide any information regarding it.

6. A collection action (b) (7)(C) originally for a (b) (7)(C) last reported delinquent on July 2012 (page 10 of the credit report).

Relative to this collection action (b) (7)(C) stated (b) (7)(C) was aware of it and (b) (7)(C) has since paid it. (b) (7)(C) said, "I paid that one."

7. A collection action (b) (7)(C) for an unspecified amount closed in August 2010 (page 13 of the credit report).

(b) (7)(C) that (b) (7)(C) disputed this collection action (b) (7)(C) (b) (7)(C) stated (b) (7)(C) disputed the account because (b) (7)(C) (b) (7)(C) could only associate (b) (7)(C) name with the account and not (b) (7)(C) correct social security number.

(b) (7)(C) (b) (7)(C)

8. A collection action by (b) (7)(C) (b) (7)(C) last reported as of December 2012 (page 14 of the credit report).

(b) (7)(C) stated to the best of (b) (7)(C) knowledge, the collection action was probably related to (b) (7)(C) (b) (7)(C) noted that (b) (7)(C) could not recall if (b) (7)(C)

9. A collection action by (b) (7)(C) (b) (7)(C) last reported as of July 2013 (page 15 of the credit report).

(b) (7)(C) stated to the best of (b) (7)(C) knowledge, the collection action was probably related (b) (7)(C)

10. A collection action by (b) (7)(C) (b) (7)(C) last reported as of March 2014 (page 15 of the credit report).

(b) (7)(C) stated (b) (7)(C) was aware of the collection action, and the collection was related to (b) (7)(C) (b) (7)(C) advised (b) (7)(C) has been re-paying (b) (7)(C) believed (b) (7)(C) would have the amount paid in full in early 2015.

During review of the credit report, (b) (7)(C) stated that (b) (7)(C) was very familiar with (b) (7)(C) credit history, because in 2012 (b) (7)(C) (b) (7)(C) stated that since subscribing, the reporting service had provided (b) (7)(C) a copy of (b) (7)(C) credit report electronically via e-mail each month. (b) (7)(C) stated the reporting service also sent "alerts" and notifications to (b) (7)(C) electronically relative to negative credit reporting or changes in (b) (7)(C) credit history. (b) (7)(C) stated that since subscribing to the service, (b) (7)(C) had received and reviewed (b) (7)(C) credit report each month, and therefore was familiar with her credit history. After further discussion, (b) (7)(C) contradicted this statement, and stated that "sometimes" (b) (7)(C) looked at the credit reports and "sometimes" (b) (7)(C) not.

Additionally, (b) (7)(C) stated that in approximately June 2014, a credit reporting bureau sent (b) (7)(C) a copy of (b) (7)(C) credit report through the mail. (b) (7)(C) noted the report was accompanied by a letter that advised the report was being provided to (b) (7)(C) because a copy had been requested by, and provided to, (b) (7)(C) (b) (7)(C) stated (b) (7)(C) assumed it was sent to (b) (7)(C) based on the background re-investigation that was initiated after (b) (7)(C) submitted (b) (7)(C) SF 85P in May 2014.

(b) (7)(C) stated that to (b) (7)(C) knowledge, (b) (7)(C) (b) (7)(C) (b) (7)(C) When asked how (b) (7)(C) could be sure given the fact that (b) (7)(C) has only recently filed a number (b) (7)(C) (b) (7)(C) replied by saying that (b) (7)(C) just knew (b) (7)(C) (b) (7)(C) acknowledged (b) (7)(C) was aware that the (b) (7)(C) (b) (7)(C) (b) (7)(C) based on (b) (7)(C)

(b) (7)(C) (b) (7)(C)

(b) (7)(C) acknowledged that initially (b) (7)(C) had been required to file the SF 85P in May 2013 in order to initiate (b) (7)(C) background re-investigation for employment suitability, but failed to file the form until May 2014. (b) (7)(C) experienced technical difficulties on a number of occasions when (b) (7)(C) attempted to log into the electronic system to file the form. (b) (7)(C) stated that the technical difficulties, along with work priorities, resulted in (b) (7)(C) failure to timely file the form. (b) (7)(C) denied that (b) (7)(C) purposely failed to timely file the form in an attempt to conceal (b) (7)(C) poor financial history.

(b) (7)(C) was provided with a copy of the SF 85P (b) (7)(C) completed and submitted electronically on May 16, 2014. (b) (7)(C) attention was directed to page four of the document, (b) (7)(C) (b) (7)(C), which read:

In the last 7 years, have you been arrested for, charged with, or convicted of any offense(s)? (Leave out traffic fines of less than \$150.)

(b) (7)(C) acknowledged that she responded "no" to the above question when (b) (7)(C) completed and submitted the form, and (b) (7)(C) answered the questions truthfully. (b) (7)(C) denied any (b) (7)(C) (b) (7)(C) would have been required to disclose had (b) (7)(C) timely completed and submitted the SF 85P. (b) (7)(C) was questioned further regarding any contact (b) (7)(C) had with (b) (7)(C) (b) (7)(C) continued to deny that (b) (7)(C)

(b) (7)(C) was advised that during the course of the investigation information had been obtained concerning (b) (7)(C) (b) (7)(C) was advised that documentation (b) (7)(C) relative to at least one of those charges.

Upon further discussion, (b) (7)(C) stated that (b) (7)(C) recalled the matter. (b) (7)(C) stated that the (b) (7)(C) (b) (7)(C) had on December 12, 2005 (b) (7)(C) (b) (7)(C) stated in the early morning of (b) (7)(C) (b) (7)(C) stated (b) (7)(C) Upon further questioning, (b) (7)(C) maintained that (b) (7)(C) was not a factor.

(b) (7)(C) was provided with court documentation which specifically reflected (b) (7)(C) (b) (7)(C) After reviewing the documentation, (b) (7)(C) admitted that (b) (7)(C) maintained that (b) (7)(C) (b) (7)(C)

(b) (7)(C) pointed out that (b) (7)(C) believed (b) (7)(C) was not required (b) (7)(C) when (b) (7)(C) completed the SF 85P, because it occurred outside of the seven year reporting period. (b) (7)(C)

(b) (7)(C) (b) (7)(C)

also stated that (b) (7)(C) "interpreted" the question on the form to mean that (b) (7)(C) was only required to disclose a matter that resulted in (b) (7)(C). It was pointed out to (b) (7)(C) that the question specifically asked if (b) (7)(C) (b) (7)(C) stated, "As you read it, I better understand it. When I read it I interpreted it as have you (b) (7)(C)

(b) (7)(C) stated that (b) (7)(C) was not an attorney, and (b) (7)(C) did not understand the nuances of the law. (b) (7)(C) continued that in (b) (7)(C) mind (b) (7)(C) (b) (7)(C) stated that given (b) (7)(C) unfamiliarity with the law and legal system, (b) (7)(C) did not fully understand what took place at (b) (7)(C) (b) (7)(C) was asked if (b) (7)(C) what was taking place, and the implications (b) (7)(C) (b) (7)(C) did not address the question, but rather responded by commenting that (b) (7)(C) a lot of money to represent (b) (7)(C) in the matter, but despite that fact, (b) (7)(C) did not work out in (b) (7)(C) favor.

(b) (7)(C) again noted that (b) (7)(C) did not believe (b) (7)(C) was required to disclose the matter because it was outside of the seven year reporting period. SID acknowledged that (b) (7)(C) occurred just outside of the seven year reporting period; however, SID was inquiring about the matter, because it resulted in (b) (7)(C) being placed in (b) (7)(C), which was within the seven year reporting period.

(b) (7)(C) was advised that during the course of the investigation concerns relative (b) (7)(C) use of the GPC issued (b) (7)(C) were raised. (b) (7)(C) was advised that a number of concerns were raised, and in particular, there were concerns related to two fraudulent transactions. Specifically, one transaction through Macy's.com for an Estee Lauder product on May 2, 2013, in the amount of \$183.12, and a second series of 30 transactions for the reload of Starbucks coffee cards on January 17, 2014, in the amount of \$2,940.00. (b) (7)(C) stated unequivocally that (b) (7)(C) had no knowledge of, or involvement with, any of the transactions whatsoever. (b) (7)(C) stated (b) (7)(C) did not make the purchases or authorize anyone to make the purchases on (b) (7)(C) behalf. Further, (b) (7)(C) stated that (b) (7)(C) never provided the GPC, or GPC information, to anyone at any time. (b) (7)(C) stated that (b) (7)(C) always maintained the GPC in (b) (7)(C) locked desk draw at the office.

(b) (7)(C) was asked numerous times throughout the interview if (b) (7)(C) would execute a consent waiver to allow SID (b) (7)(C) (b) (7)(C) (b) (7)(C) declined each request, and advised (b) (7)(C) would provide whatever documentation was needed.

On February 9, 2015, SID contacted (b) (7)(C) regarding (b) (7)(C) (b) (7)(C) advised that they had processed (b) (7)(C) between pay periods 18 through 24. (b) (7)(C) provided (b) (7)(C) The chart reflects the (b) (7)(C)

Further, (b) (7)(C) advised that (b) (7)(C) (b) (7)(C) (b) (7)(C) advised once received, (b) (7)(C) immediately (b) (7)(C)

(b) (7)(C) (b) (7)(C)

(b) (7)(C) (b) (7)(C) stated (b) (7)(C) did not provide any information or details regarding their decision (b) (7)(C).

On February 23, 2015, SID re-contacted (b) (7)(C) to determine if (b) (7)(C) had any further contact with (b) (7)(C) regarding (b) (7)(C). (b) (7)(C) advised that since receiving the December 19, 2014, (b) (7)(C) has not contacted (b) (7)(C) further, nor had (b) (7)(C).

PROSECUTORIAL COORDINATION:

(b) (7)(C), (b) (5) (b) (7)(C) was declining prosecution of (b) (7)(C) as HUD-OIG could address (b) (7)(C) conduct through agency administrative remedies.