

# EXHIBIT

1

**From:** [REDACTED]  
**To:** Barkdull, Nolan  
**Cc:** [REDACTED]; [REDACTED]  
**Subject:** RE: Driving  
**Date:** Friday, April 20, 2012 9:05:51 AM

b6

Nolan – thank you for your input. As the driving program was removed from the Facilities Division, and given to the Security Management Division to manage, I have been working with [REDACTED] (who is now in charge of this function) directly on future plans for the program. You will be informed with the other staff supporting this function on those plans when they are complete. In the meantime, please continue to support this function as directed.

b6

[REDACTED]  
[REDACTED]  
DHS Office of Inspector General  
Office of Management  
(202) [REDACTED] (Office)  
(202) [REDACTED] (Mobile)  
(202) 254-4296 (Fax)  
[REDACTED]

b6

b6

---

**From:** Barkdull, Nolan  
**Sent:** Friday, April 20, 2012 8:38 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Driving

b6

Hi [REDACTED]

I will be out of the office this afternoon driving Charles. Are we any closer to having [REDACTED] take the driving responsibility? It has been two months since the driving roster was established. This situation [REDACTED]

b5

[REDACTED] We all know [REDACTED] and [REDACTED]. This situation [REDACTED]

b6

[REDACTED] direct services to the Acting IG. From a resource management perspective, having a two GS-15s, two GS 14s, GS-13 and a GS-11 [REDACTED]

[REDACTED] Please let us know soon what we can expect in the near future as it relates to [REDACTED]. Thanks for your assistance.

Nolan M. Barkdull

Director

DHS Office of Inspector General

Office of Management/Facilities Management Division

[REDACTED] (office)

[REDACTED] (mobile)

202-254-4305 (fax)

[REDACTED]

# EXHIBIT

2

**From:** [REDACTED]  
**To:** Barkdull, Nolan  
**Cc:** [REDACTED]  
**Subject:** RE: Friday Driving  
**Date:** Tuesday, April 24, 2012 12:48:48 PM

---

b6

Nolan, thank you for your email. I will provide additional direction to you on your request shortly. Thank you.

[REDACTED]  
DHS Office of Inspector General  
Office of Management  
(202) [REDACTED] (Office)  
(202) [REDACTED] (Mobile)  
(202) 254-4296 (Fax)  
[REDACTED]

b6

---

**From:** Barkdull, Nolan  
**Sent:** Tuesday, April 24, 2012 11:57 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Friday Driving

b6

For the record,

After picking up Charles and the team from Capitol Hill last Friday evening at 6:00pm, Charles directed me to drive to 7<sup>th</sup> and D for one last stop. However, we never made it to that destination. Charles told me to make a number of turns that diverted us from the 7<sup>th</sup> and D route and had me stop at an unknown facility. [REDACTED] emerged from the building's front door and proceeded to get into the SUV. After a few moments, I realized that the [REDACTED]. It was a surprise to me that [REDACTED] to pick-up [REDACTED].

b6

After reflecting on the [REDACTED] situation that Charles [REDACTED] in Friday night, I now realize that this action placed me [REDACTED]. This also placed [REDACTED] while [REDACTED] and returning to [REDACTED] Avenue. [REDACTED] about going to 7<sup>th</sup> and D, about official business at 7<sup>th</sup> and D, and about [REDACTED]. These circumstances have now made me [REDACTED] driving Charles to his meetings. [REDACTED] because I know that he would [REDACTED]. For these reasons, I have asked [REDACTED] to remove me from the driving schedule.

b5

b6

b6

Nolan M. Barkdull

Director

DHS Office of Inspector General

Office of Management/Facilities Management Division

202-██████████ (office)

202-██████████ (mobile)

b6

202-254-4305 (fax)

████████████████████

b6

# EXHIBIT

3

C1216953



Logged In As: [REDACTED]

Thursday, October 11, 2012

Hotline

Role: Hotline Manager

Complaint # -  
C1216953

Complaint Title - Edwards, K Charles;  
Office of Inspector ...

Status - Awaiting  
Conversion

### Initiate Complaint

**Subject of Complaint** Edwards, K Charles; Office of Inspector General; DHS Employee \*

**Other Reference Number** HL-12-000791

**OIG Office** Office of Special Investigations

**Date Incident Occurred** 4/20/2012

**Date Complaint Received** 9/19/2012

**Civil Rights Complaint**  **Complaint Confidential**

**Received By** Public Website

#### Received From

**DHS Agency Affected** OIG - Office of Inspector General

**Allegation Category** Miscellaneous

**Allegation** Non-Criminal Misconduct

**Allegation Detail** Employee Misconduct, General

**Narrative** ON FRIDAY APRIL 20, 2012, ACTING INSPECTOR GENERAL CHARLES K. EDWARDS MISUSED A GOVERNMENT VEHICLE, IN VIOLATION OF 31 USC 1349(B) AND DHS POLICY, WHEN HE INSTRUCTED NOLAN BARKDULL (GS 15), TO PICKUP [REDACTED] MR. EDWARDS [REDACTED], IN A GOVERNMENT VEHICLE. [REDACTED] INFORMED OF THIS MISUSE OF A GOVERNMENT VEHICLE AND [REDACTED] COVERED UP FOR MR. EDWARDS BY TAKING NO ACTION. \*

**Dollar Loss** \$0.00

**Privacy Violation Complaint**  **OIG Reviewed**

\* Required Field



# Office of Inspector General

Enforcement Data System  
v2.1.4

Logged In As: [REDACTED]

Thursday, October 11, 2012

Hotline

Role: Hotline Manager

[Home](#) [About](#) [Help](#) [Log Off](#)

[Dashboard](#) [Initiate Complaint](#) [DHS Emp Search](#) [Search Case Data](#) [Case Special Skills](#) [Reports](#)

Complaint # - C1216953      Complaint Title - Edwards, K Charles; Office of Inspector ...      Status - Awaiting Conversion

[Initiation](#)   [People](#)   [Location of Offense](#)   [Notes](#)   [Upload Documents](#)  
[Related/Consolidated Records](#)   [Generate Letters](#)   [Log](#)   [Complaint-Action](#)

## Subject/Victim/Complainant/Witness

### Subjects(4)

<a href="#">New Subject</a>		
Name		
<input type="text"/>		
Edwards, Charles K	<a href="#">View</a>	<a href="#">Delete</a>
[REDACTED]	<a href="#">View</a>	<a href="#">Delete</a>
[REDACTED]	<a href="#">View</a>	<a href="#">Delete</a>
[REDACTED]	<a href="#">View</a>	<a href="#">Delete</a>

### Victims(0)

<a href="#">New Victim</a>	
Name	
<input type="text"/>	
No records to display.	

### Complainants(1)

<a href="#">New Complainant</a>		
Name	Disclosure (Y/N)	
<input type="text"/>		
LNU, FNU	<a href="#">View</a>	<a href="#">Delete</a>

### Witnesses(0)

<a href="#">New Witness</a>	
Name	
<input type="text"/>	
No records to display.	

**Izzard, James**

---

**From:** Izzard, James  
**Sent:** Thursday, October 11, 2012 3:10 PM  
**To:** McGovern, Steve  
**Cc:** DHSINVCOMPLAINTS  
**Subject:** RE: Hotline Complaint C1216953

Thanks Steve. As discussed, I will open it in EDS and [REDACTED] [REDACTED] 7E  
[REDACTED] That is with the understanding that the matter has been referred to CIGIE by our higher-ups. As a suggestion, it would be a good idea for the referral to CIGIE to be uploaded to the complaint in EDS to complete the circle.

Thanks,

**James Izzard, Jr.**  
Special Agent in Charge  
DHS OIG - Office of Special Investigations  
O-202-254-[REDACTED] C-202-369-[REDACTED] F-202-254-[REDACTED] b6 7C

---

**From:** McGovern, Steve  
**Sent:** Thursday, October 04, 2012 3:31 PM  
**To:** Izzard, James  
**Cc:** DHSINVCOMPLAINTS  
**Subject:** Hotline Complaint C1216953

James

We have received a complaint against IG(A) Edwards via the Hotline online complaint form. I alerted AIG(A) Dupuy about the complaint and presented him with one printed copy of the complaint. [REDACTED]

[REDACTED] b5  
[REDACTED] b5

We are sending the complaint to you in EDS and ask that you accept it for investigation and [REDACTED] b5  
7E [REDACTED] We are attaching this email to file for the record.

Thanks,  
Steve

# Case Summary Report

## I13-DHSOIG-SID-00039

**Title:** Edwards, K Charles; Office of Inspector General; DHS Employee

Date Rcd: 9/19/2012 Date Assigned: 10/11/2012 Date Opened: 10/4/2012 Date Closed: 10/11/2012

Rcd Method: Public Website Agent: Izzard, James

Agency: PrimaryOffice: Special Investigations Division

Ref Agency:

Allig Type: Miscellaneous \ Non-Criminal Misconduct \ Employee Misconduct, General

Special: No Privacy: No Confidential: No Dollar Loss: \$0.00

Joint Agency:

Ref Cases: C1216953  
HL-12-000791

Comments: ON FRIDAY APRIL 20, 2012, ACTING INSPECTOR GENERAL CHARLES K. EDWARDS MISUSED A GOVERNMENT VEHICLE, IN VIOLATION OF 31 USC 1349(B) AND DHS POLICY, WHEN HE INSTRUCTED NOLAN BARKDULL (GS 15), TO PICKUP [REDACTED], MR. EDWARDS [REDACTED], IN A GOVERNMENT VEHICLE.

[REDACTED] WERE [REDACTED] INFORMED OF THIS MISUSE OF A GOVERNMENT VEHICLE AND [REDACTED] COVERED UP FOR MR. EDWARDS BY TAKING NO ACTION.

### People - Subjects

**Edwards, Charles** Home Male  
Aka: SSN: EOD:  
POB: State: Zip:  
DOB:  
Address: Company Name: City: State: Zip:  
DHS Emp: YES DHS Exec: No  
Phone:  
Email:

**Edwards, Charles** Work Male  
Aka: SSN: EOD:  
POB: State: Zip:  
DOB:  
Address: Company Name: City: State: Zip:  
DHS Emp: YES DHS Exec: No  
Phone:  
Email:

#### IMPORTANT NOTICE

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# Case Summary Report

## 113-DHSOIG-SID-00039

[REDACTED]

### Home

Aka: SSN: EOD:  
POB: State: Zip:  
DOB:  
Address: Company Name:  
City: State: Zip:  
DHS Emp: YES DHS Exec: No  
Phone:  
Email:

---

[REDACTED]

### Work

Aka: SSN: EOD:  
POB: State: Zip:  
DOB:  
Address: Company Name:  
City: State: Zip:  
DHS Emp: YES DHS Exec: No  
Phone:  
Email:

---

[REDACTED]

### Home

Aka: SSN: EOD:  
POB: State: Zip:  
DOB:  
Address: Company Name:  
City: State: Zip:  
DHS Emp: YES DHS Exec: No  
Phone:  
Email:

---

[REDACTED]

### Work

Aka: SSN: EOD:  
POB: State: Zip:  
DOB:  
Address: Company Name:  
City: State: Zip:  
DHS Emp: YES DHS Exec: No  
Phone:  
Email:

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# Case Summary Report

## I13-DHSOIG-SID-00039

**Home**

Aka: [REDACTED] SSN: [REDACTED] EOD: [REDACTED]  
POB: [REDACTED] State: [REDACTED] Zip: [REDACTED]  
DOB: [REDACTED]  
Address: [REDACTED] Company Name: [REDACTED]  
City: [REDACTED] State: [REDACTED] Zip: [REDACTED]  
DHS Emp: NO DHS Exec: No  
Phone: [REDACTED]  
Email: [REDACTED]

---

**Work**

Aka: [REDACTED] SSN: [REDACTED] EOD: [REDACTED]  
POB: [REDACTED] State: [REDACTED] Zip: [REDACTED]  
DOB: [REDACTED]  
Address: [REDACTED] Company Name: [REDACTED]  
City: [REDACTED] State: [REDACTED] Zip: [REDACTED]  
DHS Emp: NO DHS Exec: No  
Phone: [REDACTED]  
Email: [REDACTED]

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# Case Summary Report

## I13-DHSOIG-SID-00039

### People - Complainants

LNU, FNU

Aka:

POB:

DOB:

Address:

DHS Emp: Yes

Phone:

Email:

Home

SSN:

EOD:

POB State:

Company:

City:

State:

Zip:

DHS Exec: No

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LNU, FNU

Aka:

POB:

DOB:

Address:

DHS Emp: Yes

Phone:

Email:

Work

SSN:

EOD:

POB State:

Company:

City:

State:

Zip:

DHS Exec: No

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### People - Witness

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### People - Victims

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# Case Summary Report

## I13-DHSOIG-SID-00039

### Violations

Name: Edwards, Charles  
Violation: Other Violation  
Allegation Type: Allegation Status: Information Only  
Primary Allegation: True Ethical Conduct: None  
Factual Detail: This matter is referred to CIGIE for consideration

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Name: [REDACTED]  
Violation: Other Violation  
Allegation Type: Allegation Status: Information Only  
Primary Allegation: True Ethical Conduct: None  
Factual Detail:

---

Name: [REDACTED]  
Violation: Other Violation  
Allegation Type: Allegation Status: Information Only  
Primary Allegation: True Ethical Conduct: None  
Factual Detail:

---

Name: [REDACTED]  
Violation: Other Violation  
Allegation Type: Allegation Status: Information Only  
Primary Allegation: True Ethical Conduct: None  
Factual Detail:

---

### Case Dates:

Received:	9/19/2012	Assigned:	10/11/2012	Reassigned:	
Prb Referral:		Retention:		Acknowledged	
Incident Start:		Incident End:		Approx:	No
Police Report:		Police Rpt #:			
Notified:		Reesponse:		Referred:	
Investigation Comp:		Closed:	10/11/2012		
Prb Decision:		Reopened:			

---

### Location

Airport:	Location:	
City:	State:	Zip:
Facility:	FFDO Airline:	
Investigation Loc:	Region:	
Transport Mode:		

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# Case Summary Report

## 113-DHSOIG-SID-00039

### Notes

Hotline Service, Hotline

Note Type: Standard Case Note

Create Date: 9/19/2012

Note: Public website submitter indicated that the incident location was: Washington, D.C.

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Hotline Service, Hotline

Note Type: Standard Case Note

Create Date: 9/19/2012

Note: Public website submitter indicated that the duty status of subject was: On Duty

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Hotline Service, Hotline

Note Type: Standard Case Note

Create Date: 9/19/2012

Note: Public website complainant indicated that their Employment Title is: OFFICE OF MANAGEMENT

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Hotline Service, Hotline

Note Type: Standard Case Note

Create Date: 9/19/2012

Note: Public website complainant indicated that the subject Edwards had miscellaneous identifiers of: Acting Inspector General

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Hotline Service, Hotline

Note Type: Standard Case Note

Create Date: 9/19/2012

Note: Public website complainant indicated that the subject [REDACTED] had miscellaneous identifiers of:

---

Hotline Service, Hotline

Note Type: Standard Case Note

Create Date: 9/19/2012

Note: Public website complainant indicated that the subject [REDACTED] had miscellaneous identifiers of:

---

Hotline Service, Hotline

Note Type: Standard Case Note

Create Date: 9/19/2012

Note: Public website complainant indicated that the subject [REDACTED] had miscellaneous identifiers of:

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Izzard, James

Note Type: Standard Case Note

Create Date: 10/11/2012

Note: Senior management has advised this matter is being self-reported to CIGIE (See uploaded email). OSI was requested to open the matter [REDACTED].

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### Technical

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### Disposition - Criminal

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### Dispositions - Civil

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### Disposition - Admin

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# Case Summary Report

## I13-DHSOIG-SID-00039

Subject Violation: Edwards, Charles Other - Violation  
Referral Date: Admin Dispo Dt: Admin:  
Unrelated Inv.: False Tort Claim #: Admin Days:  
Admin Claim: Admin Claim #: Admin Claim Dt:  
Restitution Date: Restitution: \$0.00  
Fine Date: Fine Amt: \$0.00  
Cost Savings Dt: Cost Savings:  
Recovery Date: Recovery: \$0.00  
Ref Outside Dt: 10/11/2012 Suspension Dt:  
Memo:

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Subject Violation: [REDACTED] Other - Violation  
Referral Date: Admin Dispo Dt: Admin:  
Unrelated Inv.: False Tort Claim #: Admin Days:  
Admin Claim: Admin Claim #: Admin Claim Dt:  
Restitution Date: Restitution: \$0.00  
Fine Date: Fine Amt: \$0.00  
Cost Savings Dt: Cost Savings:  
Recovery Date: Recovery: \$0.00  
Ref Outside Dt: 10/11/2012 Suspension Dt:  
Memo:

---

Subject Violation: [REDACTED] Other - Violation  
Referral Date: Admin Dispo Dt: Admin:  
Unrelated Inv.: False Tort Claim #: Admin Days:  
Admin Claim: Admin Claim #: Admin Claim Dt:  
Restitution Date: Restitution: \$0.00  
Fine Date: Fine Amt: \$0.00  
Cost Savings Dt: Cost Savings:  
Recovery Date: Recovery: \$0.00  
Ref Outside Dt: 10/11/2012 Suspension Dt:  
Memo:

---

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# Case Summary Report

## 113-DHSOIG-SID-00039

Subject Violation: [REDACTED] Other - Violation  
Referral Date: Admin Dispo Dt: Admin:  
Unrelated Inv.: False Tort Claim #: Admin Days:  
Admin Claim: Admin Claim #: Admin Claim Dt:  
Restitution Date: Restitution: \$0.00  
Fine Date: Fine Amt: \$0.00  
Cost Savings Dt: Cost Savings:  
Recovery Date: Recovery: \$0.00  
Ref Outside Dt: 10/11/2012 Suspension Dt:  
Memo:

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### MIR

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### ROI / Referral

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### Collaterals

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#### Uploaded Documents

Date Prepared: 10/4/2012 Grand Jury: No

Doc Type: email - internal

Description: Complaint Origination Document(s)

---

Date Prepared: 10/11/2012 Grand Jury: No

Doc Type: Email from Hotline

Description: Other Document(s)

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, September 25, 2012 4:22 PM  
**To:** 'ic.complaints@ic.fbi.gov'  
**Cc:** [REDACTED]@ic.fbi.gov'  
**Subject:** Self Report  
**Attachments:** Letter of Self Report.pdf; Case Summary Report.pdf; MD 0520.1.pdf; MD 118-01.pdf; DHS Executive Sedan Service SOP.pdf

[REDACTED]

Attached please find a letter of "self-report" from Acting IG Edwards, DHS OIG, along with several attachments.

Please let me know if you need anything else.

Thanks,

[REDACTED]

[REDACTED]  
*Special Assistant to the Acting Inspector General*  
*Office of Inspector General*  
202-254-[REDACTED]

As required by the "Policies and Procedures of the Integrity Committee of the Council of the Inspectors General on Integrity and Efficiency," I am reporting that an unnamed complainant has alleged that on Friday, April 20, 2012, I misused a government vehicle in violation of 31 USC 1349(B) and Department of Homeland Security policy. The complainant asserts that I used the government vehicle to pick-up [REDACTED], [REDACTED]. The complainant also alleges that [REDACTED] members of my staff, who were informed of the alleged misuse, took no action, thus creating the appearance of a cover-up.

Although I consider this matter frivolous and lacking merit, it is important for you to know that upon my request, the driver did pick-up [REDACTED] while I and two other members of my staff were in the vehicle returning from all-day Congressional briefings at the Hart and Ford Buildings. The briefings did not conclude until after 6:30 pm. [REDACTED], who at the time, was working at [REDACTED], got off work at [REDACTED]

[REDACTED] In other words, we did not deviate from our normal route from 'the Hill' to my office.

Also, the complainant incorrectly identifies [REDACTED] [REDACTED]." [REDACTED] is, in fact, a [REDACTED]

As for the two senior employees who were informed about this incident [REDACTED] [REDACTED] Therefore, [REDACTED] did not conspire to "cover-up" this matter.

I have attached for your review, the complaint, Case Summary Report C12-OIG-TD-16953, MD 118-01 (Motor Vehicle Fleet Management Program), MD 0520.1 (Motor Pool Operations) and a copy of the Department of Homeland Security Headquarters Executive Sedan Service Standard Operation Procedures – 118-01-0002, dated December 6, 2011. I will gladly provide any additional information that you need.

Thank you.



Charles K. Edwards  
Acting Inspector General

**Integrity Committee**  
Council of the Inspectors General on Integrity and Efficiency

935 Pennsylvania Ave., NW, Room 3973  
Washington, D.C. 20535-0001

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**Personal and Confidential**

December 6, 2012

Charles K. Edwards  
Acting Inspector General  
Department of Homeland Security (DHS)  
245 Murray Drive, Building 410  
Washington, DC 20528

**Re: IC 728**

Dear Mr. Edwards:

This letter will notify you of the Integrity Committee's (IC) disposition of your self-referral to the IC for review of an anonymous complaint. The anonymous complaint alleged as the Acting Inspector General, you misused a government vehicle.

The complaint was reviewed by the IC during its November 14, 2012 meeting. The IC determined the complaint did not meet the IC's threshold standard. The IC will take no further action on this matter and has closed the complaint. The IC has forwarded the complaint to Secretary Janet Napolitano, Department of Homeland Security, for whatever action is deemed appropriate.

Sincerely,



Integrity Committee

b6 7C per FBI  
on behalf of CIGIE  
Integrity Committee

## Edwards, Charles

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**From:** Sandweg, John  
**Sent:** Wednesday, December 12, 2012 5:35 PM  
**To:** Edwards, Charles  
**Subject:** FW: Self Report

FYI-

---

**From:** Paschall, Robert  
**Sent:** Wednesday, December 12, 2012 12:40 PM  
**To:** Sandweg, John  
**Subject:** RE: Self Report

After reviewing the information provided by the Acting Inspector General, I find as a matter of law that there was no violation of 31 U.S.C. 1349(b) as alleged by the complainant. 31 U.S.C. § 1349(b) prohibits employees from using passenger motor vehicles owned or leased by the United States Government for any reason other than "official purposes." The Acting IG was engaged in official purposes while returning from a Congressional briefing at the Hart and Ford Congressional Office Buildings. The fact that he picked up [REDACTED], a federal government employee, while directly returning from this meeting without deviating from his route does not change the fact that his trip was for official purposes and does not constitute a violation of 31 U.S.C. §1349(b).

# EXHIBIT

4

C1314472

# Case Summary Report

## C13-DHSOIG-AIG-04472

**Title:** [REDACTED]; U.S. Department of Homeland Security, Office of Inspector General (DHS); DHS Employee

Date Rcd: 1/26/2013 Date Assigned: Agent: Date Opened: 1/26/2013 Date Closed: 2/4/2013

Rcd Method: Public Website

Agent:

Agency:

PrimaryOffice:

Ref Agency:

Alleg Type: Miscellaneous \ Non-Criminal Misconduct \ Abuse of Authority

Special: No Privacy: No Confidential: No Dollar Loss: \$0.00

Joint Agency:

Ref Cases: HL-13-000638

Comments: Charles Edwards and [REDACTED] are both abusing their authority by not placing [REDACTED] administrative leave while [REDACTED]

### People - Subjects

[REDACTED] Home

Aka: [REDACTED] SSN: EOD:  
POB: [REDACTED] State: Zip:  
DOB:  
Address: Company Name:  
City: State: Zip:  
DHS Emp: YES DHS Exec: No  
Phone:  
Email:

[REDACTED] Work

Aka: [REDACTED] SSN: EOD:  
POB: [REDACTED] State: Zip:  
DOB:  
Address: Company Name:  
City: State: Zip:  
DHS Emp: YES DHS Exec: No  
Phone:  
Email:

#### IMPORTANT NOTICE

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# Case Summary Report

## C13-DHSOIG-AIG-04472

### People - Complainants

LNU, FNU  
Aka: Home  
POB: SSN: EOD:  
DOB: POB State:  
Address: Company:  
City: State: Zip:  
DHS Emp: Yes DHS Exec: No  
Phone:  
Email:

---

LNU, FNU  
Aka: Work  
POB: SSN: EOD:  
DOB: POB State:  
Address: Company:  
City: State: Zip:  
DHS Emp: Yes DHS Exec: No  
Phone:  
Email:

---

### People - Witness

---

### People - Victims

---

### Violations

#### Case Dates:

Received:	1/26/2013	Assigned:	Reassigned:
Prb Referral:		Retention:	Acknowledged
Incident Start:	1/1/2013 12:00:00 AM	Incident End:	Approx: No
Police Report:		Police Rpt #:	
Notified:		Response:	Referred:
Investigation Comp:	1/1/2013 12:00:00 AM	Closed:	2/4/2013
Prb Decision:	1/1/2013 12:00:00 AM	Reopened:	

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# Case Summary Report

## C13-DHSOIG-AIG-04472

### Location

Airport: Location:  
City: State: Zip:  
Facility: FFDO Airline:  
Investigation Loc: Region:  
Transport Mode:

---

### Notes

, Hotline Service

Note Type: Standard Case Note Create Date: 1/26/2013  
Note: Public website submitter indicated that the incident location was: [REDACTED], DHS OIG HQ

, Hotline Service

Note Type: Standard Case Note Create Date: 1/26/2013  
Note: Public website submitter indicated that the duty status of subject was: On Duty

, Hotline Service

Note Type: Standard Case Note Create Date: 1/26/2013  
Note: Public website complainant indicated that their Employment Title is: [REDACTED]

, Hotline Service

Note Type: Standard Case Note Create Date: 1/26/2013  
Note: Public website complainant indicated that the subject [REDACTED] had miscellaneous identifiers of: [REDACTED]

Paradis, Peter

Note Type: Standard Case Note Create Date: 2/4/2013  
Note: This conversion request was rejected by Peter Paradis of the AIG Office office on Feb 4 2013 5:43PM. Any questions regarding this rejection should be directed to above named either by phone at or email at [REDACTED]@oig.dhs.gov

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### Technical

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### Disposition - Criminal

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### Dispositions - Civil

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### Disposition - Admin

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### MIR

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### ROI / Referral

Case Type: Complaint Referral Date: 1/28/2013 Response Date: 1/28/2013 Closed Date: 2/4/2013  
Action: Admin Closure Agency Referred:

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### Collaterals

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# Case Summary Report

## C13-DHSOIG-AIG-04472

### Uploaded Documents

Date Prepared: 1/29/2013

Grand Jury: No

Doc Type: A/SAC SID Memo with attached MOA (interview)

Description: Memorandum of Activity

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**OFFICE OF INSPECTOR GENERAL**  
Department of Homeland Security

Washington, DC 20528 / [www.oig.dhs.gov](http://www.oig.dhs.gov)

February 28, 2013

CIGIE Integrity Committee

ATTN: Philip Johnson

In accordance with the policies and procedures of the Integrity Committee (IC) of the Council of the Inspectors General on Integrity and Efficiency (CIGIE), I am referring an allegation of wrongdoing concerning the Deputy Inspector General Charles Edwards [REDACTED] the IC for appropriate attention.

The allegation was received via the DHS OIG hotline on January 26, 2013. The complaint, C1304472 (as attached) alleges that, "Charles Edwards and [REDACTED] are both abusing their authority by not placing [REDACTED] administrative leave while [REDACTED]. We followed the same procedures as in previous cases where the subject was not placed on administrative leave while preliminary interviews were conducted to determine whether a referral to the IC was appropriate. Preliminary interviews did not substantiate the original allegation and therefore, there was no basis for placing [REDACTED] on administrative leave.

[REDACTED]

b6 7C and/or non responsive to the request.

Please let me know if you have any questions or need additional information from me.

Respectfully,

Russell H. Barbee, Jr.  
Assistant Inspector General for Management  
Office of Inspector General  
Department of Homeland Security

Attachment



Enforcement Data System v2.1.8

# Office of Inspector General

Logged in As: Dupuy, John

Wednesday, February 27, 2013

Hotline

Role: Hotline Manager

[Home](#) [About](#) [Help](#) [Log Off](#)

[Dashboard](#) [DHS Emp Search](#) [Re-Assign](#) [Search Case Data](#) [Case Special Skills](#) [Reports](#) [QIR](#)

Complaint # - C1304472

Complaint Title - [REDACTED]; U.S. Department of Home...

Status - Closed Not Converted

Initiation	People	Staff	Violations	Dates	Location of Offense	Notes
Technical Elements	Disposition	Significant Investigative Activity		Upload Documents		
Related/Consolidated Records	Generate Letters	Log	MIR	Collaterals	ROI-Action	

Initiate Investigation

Return

Investigation Title  \*

Chars left  Spell Check

Individual or Joint Agency Investigation

Other Reference Number  Add More

OIG Office AIG Office

Primary Agent

Date Assigned

Date Complaint Received

Civil Rights Complaint  Complaint Confidential

Received By Public Website

Received From

DHS Agency Affected DHSOIG - U.S. Department of Homeland Security, Office of Inspector General (DHS)

Allegation Category Miscellaneous

Allegation Non-Criminal Misconduct

Allegation Detail Abuse of Authority

Narrative

Chars left  Spell Check

Dollar Loss

Privacy Violation Complaint

Save Cancel

\* Required Field

**Integrity Committee**  
Council of the Inspectors General on Integrity and Efficiency  
935 Pennsylvania Avenue, N.W., Room 3973  
Washington, D.C. 20535  
IC\_Complaints@ic.fbi.gov

---

**Personal and Confidential**

May 6, 2013

Russell H. Barbee, Jr.  
Assistant Inspector General for Management  
Department of Homeland Security  
245 Murray Drive  
Building 410  
Washington, D.C. 20528

Re: Complaint to the Integrity Committee of the CIGIE

Dear Mr. Barbee:

The Integrity Committee (IC) of the Council of the Inspectors General on Integrity and Efficiency (CIGIE) reviewed the anonymous complaint against you and Charles Edwards, Acting Inspector General, Department of Homeland Security. The complaint, C1304472, dated January 26, 2013, was forwarded by your office to the IC on February 28, 2013.

The IC is charged with receiving, reviewing, and investigating, where appropriate, allegations of administrative misconduct made against Inspectors General and designated members of an Inspector General's staff. The complaint must be made against a person who is subject to the IC's jurisdiction, and the allegation must substantially involve administrative misconduct (defined as a violation of law, rule or regulation, gross waste of funds, or abuse of authority in the exercise of official duties or while acting under color of office) or potentially involves conduct so serious that it may undermine the appearance of integrity reasonably expected of an Inspector General or Office of Inspector General senior staff member.

The allegation does not meet the threshold standard necessary for further review by the IC. Thank you for bringing this matter to the attention of the IC.

Sincerely,



Integrity Committee

b6 7C per FBI  
on behalf of CIGIE  
Integrity Committee

# EXHIBIT

5

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

_____	)	
CAUSE OF ACTION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.: 13-876-RJL
	)	
UNITED STATES DEPARTMENT	)	
OF HOMELAND SECURITY, OFFICE OF	)	
THE INSPECTOR GENERAL	)	
	)	
Defendant.	)	
_____	)	

**DEFENDANT’S CONSENT MOTION FOR AN ORDER ADOPTING  
THE PARTIES’ PROPOSED SCHEDULING ORDER FOR FURTHER PROCEEDINGS**

Defendant, United States Department of Homeland Security’s Office of the Inspector General, respectfully submits this motion for an Order adopting the parties’ proposed scheduling order for further proceedings in this case. In accordance with Local Rule 7(m), Defendant has conferred with Plaintiff and Plaintiff consents to the requested relief and to the proposed schedule.

Plaintiff’s lawsuit is brought pursuant to the Freedom of Information Act (“FOIA”). On November 18, 2013, the Court granted Defendant’s Consent Motion to Continue the Stay up to and including December 18, 2013, in order for Plaintiff to finish reviewing Defendant’s response to Plaintiff’s FOIA request. As indicated in Defendant’s previous status report, Defendant has conferred with Plaintiff to propose appropriate next steps for the litigation. The parties have agreed to and hereby propose the following schedule:

Defendant shall file its answer by no later than January 17, 2014;

Defendant shall file its Motion for Summary Judgment by no later than February 21, 2014;

Plaintiff shall file its Opposition and any Cross-Motion for Summary Judgment by no later

than March 24, 2014;

Defendant shall file its Reply and any Opposition to any Cross-Motion for Summary Judgment by no later than April 24, 2014;

Plaintiff shall file any Reply in support of any Cross-Motion for Summary Judgment by no later than May 8, 2014.

A proposed order is enclosed.

December 17, 2013<sup>1</sup>

Respectfully submitted,

RONALD C. MACHEN JR.  
D.C. BAR # 447889  
United States Attorney for the District of Columbia

DANIEL F. VAN HORN  
D.C. Bar #924092  
Chief, Civil Division

By: \_\_\_\_\_/s/\_\_\_\_\_  
ADDY R. SCHMITT  
DC Bar #489094  
Assistant United States Attorney  
555 Fourth St., N.W.  
Washington, D.C. 20530  
Phone: (202) 252-2530  
Fax: (202) 514-8780  
[Addy.Schmitt@usdoj.gov](mailto:Addy.Schmitt@usdoj.gov)

Of counsel:

Jennifer Ashworth Kendrick  
Assistant Counsel to the Inspector General

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<sup>1</sup> Undersigned counsel attempted to file this motion on December 16, 2013, but ECF was unavailable for external users due to technical problems.

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

_____	)	
CAUSE OF ACTION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.: 13-876 (RJL)
	)	
UNITED STATES DEPARTMENT	)	
OF HOMELAND SECURITY, OFFICE OF	)	
THE INSPECTOR GENERAL	)	
	)	
Defendant.	)	
_____	)	

**PROPOSED ORDER**

Having considered the Defendant’s Consent Motion for an Order Adopting the Parties’ Proposed Scheduling Order, and the entire record herein, it is this \_\_\_\_\_ day of \_\_\_\_\_, 2013, hereby:

ORDERED that the motion is GRANTED; and it is further

ORDERED that Defendant shall file its answer by no later than January 17, 2014; and it is further

ORDERED that Defendant shall file its Motion for Summary Judgment by no later than February 21, 2014; Plaintiff shall file its Opposition and any Cross-Motion for Summary Judgment by no later than March 24, 2014; Defendant shall file its Reply and any Opposition to any Cross-Motion for Summary Judgment by no later than April 24, 2014; Plaintiff shall file any Reply in support of any Cross-Motion for Summary Judgment by no later than May 8, 2014.

SO ORDERED.

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE