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**Office of Inspector General
Investigations Staff**

Case Closing Memorandum

I. Administrative Data

(b)(3) (b)(6) (b)(7)(c)	Case No.: <u>2013-11541</u>	Case Title: <u>Qui Tam Action</u>	(b)(3) (b)(6) (b)(7)(c)
	Investigator: <u>[redacted]</u>	Supervisor: <u>[redacted]</u>	
	Date Received: <u>30 August 2013</u>	Date Opened: <u>13 September 2013</u>	
	Date Assigned: <u>25 September 2013</u>	Case Type: <u>Preliminary Investigation</u>	

II. Summary of Investigative Actions

1. (S//NF) On 30 August 2013, the CIA Office of Inspector General (OIG) received notification from the CIA Office of General Counsel, Litigation Division (OGC/LD), regarding a qui tam action pending with the US Attorney's Office (USAO [redacted]). The relator stated that the CIA had been minimally affected by the alleged misconduct, bid rigging, securities fraud, and violation of the Foreign Corrupt Practices Act (FCPA). (b)(1)
(b)(3)

2. (S//NF) The defendant company was identified as [redacted] and the relator "John Roe," who was later identified as [redacted]. The qui tam information the OGC provided to the OIG cited [redacted] its subsidiaries, and senior executives as defendants in the qui tam civil action. The scope of the OIG's investigation included a review of the qui tam information; coordination with Office of Security, OGC/LD attorneys, [redacted] management, and the USAO [redacted] and interviews to determine the extent, if any, of loss or damage to the CIA. (b)(6)
(b)(7)(c)
(b)(3)
(b)(3)

(b)(1)
(b)(3)
(b)(7)(c)

III. Findings

3. (S//NF) The OIG investigation found that [redacted] through its senior executives [redacted] (both named defendants) had been working with [redacted] at the time of the qui tam claim. (b)(3)
(b)(6)
(b)(7)(c)

4. (S//NF) The OIG investigation determined there was a [redacted] relationship between [redacted] and the Agency. The relator [redacted]
[redacted] (b)(1)
(b)(3)
(b)(6)
(b)(7)(c)

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[redacted]

(b)(3)

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(b)(1)

(b)(3)

(b)(1)

(b)(3)

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5. (C//NF) At the request of OGC and USAO [redacted] OIG special agents [redacted]

[redacted] to review information in the custody of the USAO and interviewed [redacted]

The review of documentation and interview of [redacted] revealed no apparent indications of a CIA affiliation, involvement, and/or affected by the qui tam allegation. (b)(6)

(b)(7)(c)

6. (C//NF) The OIG found no viable leads to be pursued and no evidence to substantiate that the Agency had any involvement in or affected by the alleged misconduct, bid rigging, securities fraud, and/or violation of the FCPA by [redacted] or other defendants. Due to a lack of jurisdiction or evidence to support the allegations with regard to the CIA, this investigation is being closed. Should new information be developed the OIG may consider reopening this case.

(b)(3)

(b)(7)(c)

IV. Review and Approval

Case Closing Memo submitted by Investigator to Supervisor: [redacted]

(b)(3)
(b)(6)
(b)(7)(c)

[redacted]

** Signed by ASAC due to transfer out of OIG.*

[redacted]

16 Oct 2014
(Sign / Date)

(b)(3)

(b)(6)

(b)(7)(c)

Case Closing Memo approved by Special Agent in Charge: [redacted]

[redacted]

10/16/14

(b)(3)

(b)(6)

(b)(7)(c)

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