RE: FOIA Request No. F-00015-13

The United States Agency for International Development (USAID) regrets the delay in responding to your Freedom of Information Act (FOIA) request. Unfortunately, USAID is experiencing a backlog of FOIA requests. Please know that USAID management is very committed to providing responses to FOIA requests and remedying the FOIA backlog.

This is our final response to your FOIA request dated November 18, 2012. You requested the final report, closing memorandum and the referral memorandum or letter for the following eleven USAID Office of the Inspector General (OIG) investigations:

10. United States Protection and Investigations LLC fraud – opened 3/13/2008 and closed 2/24/2012; and

For your information, Congress excluded three (3) discrete categories of law enforcement and national security records from the FOIA. See 5 U.S.C. § 552(c) (2006 & Supp. IV (2010)). This response is limited to those records that are subject to the requirements of the FOIA. This is a standard notification that is given to all of our requesters and should not be construed as an indication that excluded records do, or do not, exist.

USAID conducted a comprehensive search of the Office of the Inspector General (OIG). The search produced a total of 50 pages. Of those pages, we determined that 15 pages of records
are releasable in their entirety. 18 pages are partially released, and 17 are withheld in their entirety to pursuant to Title 5 U.S.C. § 552 (b)(6), (b)(7)(C), (b)(7)(D), (b)(7)(E) and (b)(7)(F). Based on the information you provided, OIG located six of the eleven requested investigations. This is a voluminous request that required extensive review by OIG. We are providing records for items 1, 2, 4, 10, and 11. Items 3 and 9 are withheld in their entirety. No records were located for items 5-8.

FOIA Exemption 6 exempts from disclosure information about individuals in personnel or medical files and similar files the release of which would cause a clearly unwarranted invasion of personal privacy. This requires a balancing of the public’s right to disclosure against the individual’s right to privacy. The privacy interests of the individuals in the records you have requested outweigh any minimal public interest in disclosure of the information. Any private interest you may have in that information does not factor into the aforementioned balancing test. In this instance, we withheld any information regarding the identity of the subject and law enforcement personnel including signatures, names, titles, phone numbers and OIG case numbers. OIG case numbers are not randomly generated and as such, if released, could possibly reveal sources involved.

FOIA Exemption 7(C) protects records or information compiled for law enforcement purposes that could reasonably be expected to constitute an unwarranted invasion of personal privacy. This exemption takes particular note of the strong interests of individuals, whether they are suspects, witnesses, or investigators, in not being unwarrantably associated with alleged criminal activity. That interest extends to persons who are not only the subjects of the investigation, but those who may have their privacy invaded by having their identities and information about them revealed in connection with an investigation. Based upon the traditional recognition of strong privacy interest in law enforcement records, categorical withholding of information that identifies third parties in law enforcement records is ordinarily appropriate. As such, we have determined that the privacy interest in the identities of individuals in the records you have requested clearly outweigh any minimal public interest in disclosure of the information. Please note that any private interest you may have in that information does not factor into this determination.

FOIA Exemption 7(D) protects records or information compiled for law enforcement purposes, the release of which could reasonably be expected to disclose the identities of confidential sources.

FOIA Exemption 7(E) protects records compiled for law enforcement purposes, the release of which could disclose techniques and/or procedures for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law. We determined that disclosure of certain portions of the documents could reasonably be expected to risk circumvention of the law. Additionally, the techniques and procedures at issue are not well known to the public. Within the records, we withheld the unique OIG case numbers.
FOIA Exemption 7(F) permits the government to withhold all information about any individual when disclosure of information about him could reasonably be expected to endanger the life or physical safety of any individual. Therefore, ROIs have been withheld to protect the confidential sources and witnesses who continue to work in Iraq and Afghanistan.

You have the right to appeal the above withholdings and no records response. Your appeal must be received by our Agency no later than 30 days from the date of this letter. To be considered an official appeal, please address and send directly to the FOIA Appeals Officer:

Director, Office of Management Services  
U.S. Agency for International Development  
1300 Pennsylvania Avenue, N.W.  
Room 2.12-010, Ronald Reagan Building  
Washington, D.C. 20523

If you wish to fax your appeal, the fax number is (202) 216-3369. Both the appeal letter and envelope must be plainly marked “FOIA Appeal.” Please include your tracking number F-00015-13 in your letter.

There is no charge for this FOIA request. As this concludes the processing of your request, it will be closed.

If you need to contact our office again about this request, please refer to the case number cited above. You may contact Ms. Sylvia Lankford on 202-712-0879 or at slankford@usaid.gov.

Sincerely,

[Signature]

Lynn P. Winston, Chief  
FOIA Officer/Agency Records Officer  
Bureau for Management  
Office of Management Services  
Information and Records Division

Enclosures: Responsive Records (33 pages)
January 14, 2010

U.S. Secret Service
Washington, D.C. Field Office
P.O. Box 34060
601 4th Street, NW
Washington, D.C. 20043

SUBJECT: Identify Theft

Dear Sir/Madame:

Attached, please find the U.S. Agency for International Development (USAID), Office of Inspector General (OIG) Report of Investigation involving allegations of identity theft. The report is provided to you for whatever action you deem appropriate. Please be advised that the report contains information that may be subject to the Freedom of Information Act and the Privacy Act. As such, it must be handled appropriately.

The report remains the sole property of the Office of Inspector General and is not to be duplicated or disseminated without the expressed consent of the Inspector General or his designee. Please return the report to me upon completion of your evaluation of the matter.

Finally, I request that you advise us of any action you take in this matter. If you have any questions or need further assistance, please feel free to contact me or [redacted], respectively.

Lisa McClennon
Special Agent-in-Charge
USAID/OIG/Investigations

Attachment: a/s

U.S. Agency for International Development
1500 Pennsylvania Avenue, NW
Washington, DC 20523
www.usaid.gov/ig
Thank you for your attention to this matter. We look forward to continuing to work with you and your staff to address risks to the Agency's efforts. If you or your staff have any questions or would like additional information about OIG's observations or recommendations, please contact me or Dona M. Dinkler, Chief of Staff, at 202-712-1150.

cc: Drew Luten, Senior Deputy Assistant Administrator for Management
REPORT OF INVESTIGATION

Case Title: DC Information Systems, Incorporated
Status: Closed
Period of Investigation: 01/08/07 – 08/20/10
Case Number:

OIG/I Office: Washington, D.C.

Synopsis:

On 12/14/06, an referral from (b)(6),(b)(7)(C) was forwarded a referral from (b)(6),(b)(7)(C) regarding a conspiracy to defraud via a USAID/GSA 8(a) contract awarded to DC Information Systems, Inc. (DCIS). An 8(a) contract is awarded to federally-certified socially and economically disadvantaged firms. The USAID/GSA award in question was for the Leland Initiative which was a five-year, $15 million U.S. Government effort to extend full Internet connectivity to 20 or more African countries.

REPORT MADE BY: Name: (b)(6),(b)(7)(C) Date Signed: 08/20/10
Signature: 

APPROVING OFFICIAL: Name: (b)(6),(b)(7)(C)
Date Signed: 8/25/10
Signature: 

APPROVING OFFICIAL: Name: (b)(6),(b)(7)(C)
Date Signed: 
Signature: 

Case Title: International Relief and Development, Inc.
Status: Completed
Period of Investigation: 08/18/08 - 10/03/11
OIG/Office: Baghdad/Iraq

Synopsis:

On July 31, 2008, the Federal Bureau of Investigation (FBI) advised USAID/OIG of a bribery allegation against Blue Hackle Group (BHG), a British based security company. It was alleged that BHG offered to pay $50,000 to a member of Sabre's staff, another British security company, for insider bid information on a security contract with International Relief and Development, Inc. (IRD) under the USAID/Iraq Community Stabilization Program (CSP). USAID/Iraq awarded IRD a $648 million cooperative agreement as the main contractor on the CSP.

On 08/12/08, interviewed regarding allegations of bid rigging on IRD’s security contracts in Iraq as accepting bribes in exchange for grants. also alleged that also accepted bribes in exchange for grants.

It was alleged in numerous interviews during the joint investigation with the FBI and the Major Crimes Task Force (MCTF) that there was fraud on the IRD CSP that included bribes, ghost projects and employees, double billing, bid rigging and nepotism.

Donald A. Gambatesa, USAID Inspector General, sent an information memorandum, dated February 9, 2009, to the USAID Acting Administrator to advise of the IRD CSP investigation. In addition, Gambatesa expressed his concern about IRD CSP being vulnerable to fraud and requested an evaluation of whether USAID should continue funding it and thereby put an additional $375 million at risk.

On July 24, 2009, USAID/Iraq sent IRD a termination notice ending CSP-implemented activities in all locations and terminating all subcontracts and sub-grants that relate to the work terminated.
On or about June 16, 2009, based on OIG interviews and documents obtained during the course of the investigation, an Iraqi magistrate issued arrest warrants for 12 Iraqi nationals suspected of falsifying documents for alleged fictitious IRD CSP projects in Fallujah funded by USAID. The arrest warrants were obtained in coordination among the OIG, MCTF and Iraqi law enforcement.

On May 23, 2011, the FBI presented the investigation, to include audits, interviews and other documents to [redacted] who declined prosecution specifically against IRD employees [redacted] who are also U.S. citizens. [redacted] declined prosecution due to lack of evidence.

Details of Investigation:
WASHINGTON, DC – The Deputy Inspector General for the U.S. Agency for International Development (USAID), Michael G. Carroll, announced today that an investigation led by his office has resulted in a seven-count indictment of a USAID contracting film and four individuals for conspiracy, major fraud, and wire fraud arising from a scheme to defraud the United States in connection with the war and reconstruction efforts in Afghanistan.

The indictment was returned by a Federal grand jury in Washington, DC on September 30, 2008. Delmar Dwayne Spier, 72, and Barbara Edens Spier, 59, both residents of Houston, were arrested October 2, 2008, and made their initial appearances in the U.S. District Court for the Southern District of Texas. William Felix Dupre, 51, a resident of North Carolina, also was arrested and made his initial appearance in the U.S. District Court for the Central District of California. The indictment also charges Behzad Mehr, a resident of Afghanistan who remains a fugitive, and United States Protection and Investigation, LLC (USPI), a security company owned by the Spiers. USPI is incorporated in the state of Texas and operates in Afghanistan.

The indictment alleges that from June 2003 through July 2007, the defendants defrauded the United States by obtaining reimbursement for inflated expenses purportedly incurred for rental vehicles, fuel, and security personnel. The indictment specifically alleges that Behzad Mehr, an employee of USPI, fabricated invoices purportedly for rental vehicles and fuel companies in Afghanistan and that USPI created false documents to inflate its expenses for employing security personnel from the Afghan Ministry of Interior. The Spiers and Dupre are alleged to have used the false documents created by Behzad Mehr to obtain reimbursement from Louis Berger Group, Inc. (LBGI), and ultimately from USAID, for USPI's inflated expenses and profits.

LBGI subcontracted with USPI as part of the Rehabilitation of Economic Facilities Program (REFS Program) implemented and funded by USAID. The REFS program provides a range of assistance to the Afghan people that include the building of roads between major cities in Afghanistan and the construction of schools and health facilities. The USPI subcontract, worth approximately $60 million, required that it provide security for all LBGI contractors working on the REFS program in Afghanistan. The USPI subcontract was a cost-reimbursement contract which
required LBOJ, and ultimately USAID, to reimburse USPI for all incurred expenses and pay USPI a fee equivalent to a percentage of its incurred expenses.

The USAID Office of Inspector General was the lead investigative agency on this case with participation by the FBI and members of the National Procurement Fraud Task Force. The National Procurement Fraud Task Force, created in October 2006 by the U.S. Department of Justice, is chaired by Acting Assistant Attorney General Matthew Friedrich and was designed to promote the early detection, identification, prevention, and prosecution of procurement fraud associated with the increase in government contracting activity for national security and other government programs.

If convicted, the conspiracy charge carries a maximum sentence of five years in prison and a $250,000 fine. The charge of wire fraud carries a maximum sentence of 20 years in prison and a $250,000 fine. If convicted of major fraud, individual defendants face a maximum prison sentence of 10 years and a $1 million fine.

The case is being prosecuted by Jennifer R. Taylor, a trial attorney with the Criminal Division’s Fraud Section within the U.S. Department of Justice, Washington, DC.

Deputy Inspector General Carroll praised the outstanding work in this investigation and the cooperation between the U.S. Department of Justice and his organization to bring accountability to those who try to cheat the Government and worsen the conditions of the dedicated men and women who carry out reconstruction and development efforts in war zones.
INFORMATION REPORT

Case Opening

Reporting Agent: (b)(6), (b)(7)(C)

Source: TI-Pakistan Hotline

Report Title: Agency for Technical Cooperation and Development (ACTED) Hotline Complaints

REPORT

The USAID Anti-Fraud Hotline, managed by Transparency International - Pakistan, received several complaints regarding service delivery issues, bribes and kickbacks being solicited by former/present employees of Agency for Technical Cooperation and Development (ACTED) in Pakistan. During the last quarter of 2011 (Oct-Dec) the USAID OIG Pakistan Anti-Fraud Hotline (AFH) received a total of 74 complaints regarding ACTED. The majority of the complaints allege ACTED failed to provide services as promised due to discontinuation of goods, complainants not being provided with emergency relief goods, preferential distribution of goods, and NGO personnel seeking bribes. Of the total 74 complaints, 60 complaints pertain to service and delivery issues, 3 complaints regard solicitation of bribes, 1 complaint alleges a NGO personnel of procurement fraud, and 1 complaint is marked as “other” since the complete text of the complaint is not available, consequently not allowing the allegation type to be determined. Additionally, there are also 9 requests for aid. Several complaints refer to “tokens”, or receipts, given to persons deemed eligible to receive food or shelter relief at the time of registration by the implementing partner (ACTED). The tokens are later returned to the implementer at the time distribution of relief occurs. At the time the tokens are attempted to be redeemed by the eligible person, ACTED officials are allegedly demanding a kickback before providing the promised relief.

ACTED, in collaboration with the UK Department for International Development (DFID), FAO and WFP, has been involved in providing emergency relief services in the form of food, agricultural aid, shelter and settlements to areas that were affected by unprecedented flooding in the summer of 2011. Due to DFID and WFP’s funding of ACTED’s efforts to build flood-resistant houses in Sindh, Pakistan, and the additional agricultural projects DFID funds in the area, these complaints were referred to DFID for information and action as deemed necessary.
STATUTE, REGULATION, OR RULE VIOLATED IF ALLEGATION IS TRUE:

- Solicitation of a Bribe by an Agent of a Program Receiving Federal Funds (18 U.S.C. 666(a)(1)(B)

PLAN OF INVESTIGATION:

<table>
<thead>
<tr>
<th>No.</th>
<th>Investigative Step</th>
<th>ECD</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Distribute Referral Memo to DFID and WFP.</td>
<td>1 day</td>
</tr>
<tr>
<td>2</td>
<td>Maintain contact with DFID and WFP for any action taken regarding the referral.</td>
<td></td>
</tr>
</tbody>
</table>

SA signature: [Redacted]  Date: 2-29-12
SAC signature: [Redacted]  Date:
MEMORANDUM

TO: David Johnson, Deputy Head of Department, Internal Audit
   UK Department for International Development

FROM: Special Agent in Charge (E&E-A)

Subject: Complaints regarding the Agency for Technical Cooperation and Development (ACTED) for the Quarter of Oct-Dec 2011

This memorandum shall serve as an official referral of complaints received by USAID OIG Anti-Fraud Hotline from October 1, 2011 to December 31, 2011, regarding ACTED in Pakistan. ACTED, in collaboration with DFID, FAO and WFP, has been involved in providing emergency relief services in the form of food, agricultural aid, shelter and settlements to areas that were affected by unprecedented flooding in the summer of 2011. Due to DFID funding of ACTED’s efforts to build flood-resistant houses in Sindh, Pakistan, and the additional agricultural projects DFID funds in the area, these complaints are being referred for your information and action as you deem necessary. The food distribution related allegations will be forwarded to the UN World Food Program under separate cover.

During the last quarter of 2011 (October to December) the USAID OIG Pakistan Anti-Fraud Hotline (AFH) received a total of 74 complaints regarding ACTED. The majority of the complaints alleged ACTED failed to provide services as promised due to discontinuation of goods, complainants not being provided with emergency relief goods, preferential distribution of goods, and NGO personnel seeking bribes.

Of the total 74 complaints, 60 complaints pertain to service and delivery issues, 3 complaints regard solicitation of bribes, 1 complaint accuses NGO personnel of procurement fraud, and 1 complaint is marked as “other”. Additionally, there are also 9 aid requests. Several complaints refer to “tokens”, or receipts, given to persons deemed eligible to receive food or shelter relief at the time of registration by the implementing partner. The tokens are later returned to the implementer at the time distribution of relief occurs.
The below chart provides a breakdown of complaints according to allegation type.

![Allegation type breakdown chart]

All the complaints originated from Sindh, Pakistan and are broken down as follows:

**Service Delivery**

Sixty complaints from Sindh (Jacobabad 4, Kashmore 3, Sanghar 36, Shikarpur 2, Umer Kot 15)

The majority of the complainants alleged that the NGO personnel discontinued relief without any notification even after having committed to provide relief for several months (such complaints totaled 22). Eleven complaints indicated preferential distribution of goods and 9 complaints allege NGO personnel’s failure to provide any relief. The majority of the complaints (42 out of 60) regarded service delivery as either related to preferential distribution, discontinuation of services, or affected citizens not being provided with any sort of relief.

![Complaint Summary chart]

The remaining complaints were a mix of several issues and the summary is as follows:
<table>
<thead>
<tr>
<th>Summary of Complaints</th>
<th># of Complaints</th>
<th>Allegation Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Preferential Distribution/ Officials seeking bribes</td>
<td>1</td>
<td>Service Delivery</td>
</tr>
<tr>
<td>Improper or unjust distribution of goods</td>
<td>2</td>
<td>Service Delivery</td>
</tr>
<tr>
<td>Discontinuation of relief goods/ Fake registration of</td>
<td>1</td>
<td>Service Delivery</td>
</tr>
<tr>
<td>names</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Discontinuation of relief goods/ Officials seeking bribes</td>
<td>1</td>
<td>Service Delivery</td>
</tr>
<tr>
<td>Improper distribution of tokens</td>
<td>2</td>
<td>Service Delivery</td>
</tr>
<tr>
<td>Improper distribution of goods</td>
<td>1</td>
<td>Service Delivery</td>
</tr>
<tr>
<td>Incomplete distribution of goods</td>
<td>3</td>
<td>Service Delivery</td>
</tr>
<tr>
<td>Incomplete construction work</td>
<td>1</td>
<td>Service Delivery</td>
</tr>
<tr>
<td>Officials seeking bribe to reconstruct houses</td>
<td>1</td>
<td>Service Delivery</td>
</tr>
<tr>
<td>Official selling food tokens</td>
<td>1</td>
<td>Service Delivery</td>
</tr>
<tr>
<td>Officials involved in collusion</td>
<td>1</td>
<td>Service Delivery</td>
</tr>
<tr>
<td>Reconstruction relief not provided</td>
<td>2</td>
<td>Service Delivery</td>
</tr>
<tr>
<td>Food tokens distributed on the basis of bribery</td>
<td>1</td>
<td>Service Delivery</td>
</tr>
</tbody>
</table>

**Solicitation of Bribe, Kickbacks or Favors**

Three complaints from Sindh (Umer Kot 1, Sanghar 2)

All the complaints were made against different NGO personnel. [D(6), (B), (7)] were alleged to have sought Rs.1000 to 2000 to register citizens for a reconstruction program. [D(6), (B), (7)] is reported to have been asking Rs.2000 to expedite the process of relief.

**Procurement Fraud**

One complaint received from Sindh (Umer Kot)

Three charges are made against NGO personnel.

1. Preferential distribution of goods.
2. Selling relief tokens for Rs. 500, 700 & 1000, causing up to Rs 7 million of fraud.
3. Distributing relief goods assigned to the residents of Taluka Pithoro to the residents of other districts.

**Aid Requests**

Nine aid requests from Sindh (Umer Kot 4, Sanghar 2, Kashmore 2, MirPur Khas 1)

**Allegations regarding ACTED Staff**
NGO employee Name: Dost Mohammad Rajar

ACTED. All the complaints originating against are from During the quarter October to December 2011, 27 complaints were registered of which 25 are pertinent to service and delivery, one complaint related to solicitation of bribe, and one being an aid request.

There were 19 occasions where was reported to have been the reason for discontinuation of relief goods without notice. Of the 19 complaints, some complaints indicated false registration of names and solicitation of bribes as being the reason for discontinuation. Several other allegations were made against with the breakdown as follows: 4 complaints allege the official of preferential distribution of goods, 1 complaint alleges improper distribution of goods, 1 complaint indicates incomplete distribution and 1 highlighted non-provision of relief.

Complaint # 111229-67639 reports an allegation against along with another official named to have been responsible for discontinuation of relief goods in the food assistance category. This makes a total of 27 complaints made against

List of complaints against ACTED official along with complaint #'s for tracking purposes

<table>
<thead>
<tr>
<th>Complaint#</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>111231-47161</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111231-95381</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111230-89923</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111229-58350</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111229-61922</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111229-75399</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111228-98522</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111226-60236</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111201-05544</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111130-21480</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111130-49182</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111128-19485</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111126-97914</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111124-39576</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111124-21458</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111124-42053</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111229-67639</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111230-90808</td>
<td>Discontinuation of relief goods/ Fake registration of names</td>
</tr>
<tr>
<td>111230-82932</td>
<td>Discontinuation of relief goods/ Officials seeking bribery</td>
</tr>
<tr>
<td>111220-15480</td>
<td>Preferential distribution of goods</td>
</tr>
</tbody>
</table>
Two complaints were received regarding delivery issues related to non-food items.

<table>
<thead>
<tr>
<th>Complaint</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>111214-58838</td>
<td>Did not receive relief goods</td>
</tr>
<tr>
<td>111028-28095</td>
<td>Reconstruction relief not provided</td>
</tr>
</tbody>
</table>

Two complaints were received regarding unfair distribution of goods.

<table>
<thead>
<tr>
<th>Complaint</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>111025-83838</td>
<td>Did not receive relief goods / Improper distribution</td>
</tr>
<tr>
<td>111022-27888</td>
<td>Did not receive relief goods / Unfair distribution</td>
</tr>
</tbody>
</table>

The selection of the above officials is made primarily due to the number of complaints or allegations received against them. There are several other names which have only been reported once thus not making it to this list. However, the information regarding the remaining officials can be furnished upon request.

Complaint Summaries

The following document is sequenced in the following order:

- List of complaints related to service delivery issues (total of 60 complaints)
- List of complaints related to solicitation of bribe, kickbacks or favors (total of 3 complaints)
- List of complaints related to procurement fraud (1 complaint)
- List of aid requests (9 aid requests)
- List of complaints marked as “other” (1 complaint)
List of Complaints related to Service Delivery

1. **111231-19541 - Sanghar - NGO** committed to provide food relief (flour, oil, pulses and rice) three times but they only distributed relief once in the month of Oct 2011.

2. **111231-47161 - Sanghar - NGO employee** committed to provide relief for three months but only provided once in the month of Nov 2011.

3. **111231-95381 - Sanghar - NGO** committed to provide food relief (80 kg flour, 2 kg cooking oil, 4 kg pulses, chocolates and biscuits) for three months, but they only provided once in the month of Nov 2011.

4. **111230-89923 - Sanghar - NGO employee** committed to provide relief (flour, oil, pulses and biscuits) for three months but provided twice in Oct and Nov 2011.

5. **111230-37112 - Sanghar - NGO employee** committed to provide relief (rice, flour, cooking oil and biscuits) three times, but provided only once in Oct 2011.

6. **111230-90808 - Sanghar - NGO employee** provided relief (flour, oil, biscuits and chocolates) for three months but provided once in Oct 2011. NGO employee also registered 50 to 60 fake names of people who did not exist in the village.

7. **111230-82932 - Sanghar - NGO employee** registered 3 villagers out of 35 and committed to provide relief (oil, flour, biscuits) three times but provided only once in Oct 2011. NGO staff also seeking bribery of Rs 500 to 1000 against each token.

8. **111229-58350 - Sanghar - NGO employee** registered 3 villagers out of 10 and committed to provide relief (oil, flour, pulses and biscuits) three times but provided only once in Nov 2011.

9. **111229-61922 - Sanghar - NGO employee** registered 24 villagers out of 32 and committed to provide relief (oil, flour, pulses) three times but provided only once in Nov 2011.

10. **111229-67639 - Sanghar - NGO employee** provided food relief (oil, flour, pulses, rice and biscuits) only once in Oct 2011 contrary to their commitment of provided relief for three consecutive months.

11. **111229-75399 - Sanghar - NGO employee** committed to provide relief (flour, oil, rice, biscuits and chocolates) for three months but provided only once in Oct 2011.
12. **111228-25256 - Umerkot -** NGO staff distributed 80 kg flour, 4.5 liters of oil, 1 packet salt, biscuits and chocolates but pulses were missing. NGO also committed to provide ration for three months but they provided for one month in Oct 2011.

13. **111228-98522 - Sanghar -** NGO employee committed to provide (50 kg rice, 30 kg flour, 5 kg oil and biscuits) for three months but they only provided once in Oct 2011 saying that the village's name is rejected.

14. **111227-32237 - Umerkot -** NGO staff and in charge distributed flour, rice bags, cooking oil, pulses and biscuits in Nov 2011 among 20 affectees out of 30, leaving the remaining ten deprived of relief.

15. **111226-60236 - Sanghar -** NGO employee committed to provide relief (flour, oil, biscuits) for three months but provided only once in Oct 2011.

16. **111224-20274 - Umerkot -** NGO left two affected villagers out while distributing relief consisting of oil, flour, pulses and biscuits in the month of Nov 2011.

17. **111223-11694 - Sanghar -** NGO personnel ignored the complainant and few other affected villagers in the second round of food distribution in Dec 2011 comprising of flour, pulses, cooking oil, biscuits and tea.

18. **111220-15480 - Sanghar -** NGO employee gave food tokens to 21 houses out of 150 for ration in Oct 2011, and in the first week of Dec 2011 they took the tokens back without any reason.

19. **111219-62006 - Sanghar -** NGO employee ignored 100 poor affectees of the village in the second round of distribution of relief consisting of 80kg flour, 8 kg pulses, 5 liter oil and 5 packets of biscuits in Nov 2011.

20. **111219-08406 - Jacobabad -** NGO surveyed the complainants village in July 2011 for reconstruction program and committed to provide relief to rebuild houses which is yet to be provided.

21. **111215-70005 - Jacobabad -** NGO registered 12 houses under reconstruction program. All the houses have been built except for two which are still incomplete, NGO provided the incomplete houses with 500 bricks while doors, roofs and other material is still pending.

22. **111215-04333 - Sanghar -** NGO employees deprived 20 villagers of relief consisting of 80kg flour, 8kg pulses and biscuits in July and Nov 2011. Complainant alleged the NGO staff distributing relief on the recommendation of influential people.
23. **111214-58838 - Shikarpur** - Complainant was not able to get registered due to loss of ID card for relief consisting of 1 goat, 8 hens, 1 cock and PDI's relief of cash 6000 for pots and Rs. 2000 to be paid each month for three months.

24. **111210-55534 - Umerkot** - Food relief consisting of 40kg flour, 50kg rice, 5 liter oil, pulses and biscuits was distributed to 70 villagers in the month of Oct and Nov 2011 leaving 130 villagers with no relief.

25. **111210-79533 - Umerkot** - NGO distributed 80kg flour, 5kg pulses, 60 packets of biscuits and 5 liters oil among 25 villagers out of 200 in Oct 2011 leaving 175 villagers deprived of relief.

26. **111210-65615 - Sanghar** - NGO did not provide committed relief of 1 month ration

27. **111210-95022 - Umerkot** - Complainant requests for aid consisting of 8kg pulses, 10 kg rice bags, 20kg flour, 5kg cooking oil and 1 kg salt as it was distributed in the neighboring village in Oct 2011. Distribution happening on the basis of favoritism.

28. **111207-51885 - Sanghar** - Complainants village was ignored in the second round of relief distribution in the month of Nov 2011. Relief consisted of 2 bags of flour, 5kg oil, 8kg pulses and biscuits.

29. **111201-55328 - Sanghar** - Complainant's UC was deprived of food relief due to political reasons. ACTED and DEVCON distributing non-food items on the basis of political affiliation in his village.

30. **111201-05544 - Sanghar** - NGO employee committed to provide food relief consisting of 5 liter oil, 80kg flour, 8kg pulses for three months but only managed to provide once in Oct 2011.

31. **111130-72432 - Kashmore** - Under livestock program NGO distributed goats, hens, hen feed and agricultural support packages in complainants village while depriving 10 villagers who did not receive anything.

32. **111130-21480 - Sanghar** - NGO distributed food package consisting of oil, pulses, flour and sugar in Oct 2011, and recently started second round of distribution but it is being given to villagers with new tokens, complainant is being ignored because has old token and new is not being issued.

33. **111130-49182 - Sangbar** - NGO employee distributed food items (flour, cooking oil, and sugar) only once while the neighboring villages are being provided two to three times.
34. 111129-48696 – Sanghar - NGO registered the names of affectees in Sept 2011 and distributed relief (5 liter oil, 75kg flour, 40 packets of biscuits, 1 pack of salt and 1 packet of red chilli) twice, but they ignored 40 poor affectees.

35. 111129-16234 – Kashmore - Complainant wants to know why four people only were selected by ACTED and given the aid while the other affected were ignored.

36. 111128-19485 – Sanghar - ACTED officials registered the affectees and provided the aid once and committed to provide relief once more but told the affectees to register themselves again in order to receive the aid for the second time.

37. 111126-97914 – Sanghar - ACTED officials gave the aid once and committed to provide it three months but failed to show up for the second and third rounds of distribution.

38. 111125-74503 – Sanghar - The number of affected registered by ACTED for tokens of ration is less than the tokens distributed.

39. 111125-38926 – Jacobabad - (ACTED official) is demanding a bribe of Rs. 500 against the tokens for reconstruction. Apart from that, 10 people have been registered for the aid because of their connections with the influential people and 45 of the registered affectees have been ignored.

40. 111124-98082 - Sanghar - ACTED officials registered 70 affectees but none of them have received any relief yet.

41. 111124-39576 – Sanghar - First distribution by ACTED officials was done fairly while the second was done on the basis of favoritism.

42. 111124-21458 – Sanghar - ACTED officials gave relief items first time around but they refused to give it the second time saying that name of the registered affected has been deleted from the system.

43. 111124-42053 – Sanghar - ACTED officials distributed the aid twice but during the second distribution they took some of the names off the list and refused to give aid to them.

44. 111124-54209 – Umerkot - ACTED officials distributed aid on the recommendation of the area’s landlords, MPA and MNA.

45. 111124-72980 – Sanghar - First distribution by ACTED officials was done fairly while the second was done on the basis of favoritism.

46. 111123-35075 – Umerkot - ACTED officials asked to give away the relief items but is doing this distribution on the basis of favoritism and giving away flour and pulses only to the affectees while withholding the rest of the items.
47. 111122-26773 - Sanghar - ACTED officials gave away the aid to two people only and committed to return to provide the relief to rest of the registered affectees. When they came back, they told the registered affectees that they have distributed the items to newly registered people. Complainant has no information of the newly registered who received the relief.

48. 111122-57075 - Jacobabad - ACTED officials are implementing food distribution, reconstruction and livestock programs but ignoring the complainant’s village although they are equally affected due to floods.

49. 111121-06364 - Umerkot - ACTED officials distributed aid so that some of the people did not receive flour while the others did not get cooking oil. Also, aid was not given to those whose homes were unaffected but they were in need of relief items.

50. 111116-6933 - Sanghar - ACTED officials have not distributed the relief amongst many of the registered affectees.

51. 111105-34698 - Sanghar - ACTED officials provided relief to 3 affectees only while ignoring the remaining 400 affectees of the complainant’s village.

52. 111105-75568 - Sanghar - ACTED officials distributed NFI items to the affectees on the recommendation of influential people. They registered the names of some of the dead people and received aid on their behalf.

53. 111029-57724 - Umerkot - ACTED field in charge demanded a bribe of Rs. 1000 for the issuance of tokens.

54. 111028-28095 - Shikarpur - ACTED officials registered 54 affectees for the implementation of reconstruction program but they provided aid to two people only.

55. 111025-83838 - Umerkot - ACTED officials registered 50 affectees but distributed aid to 4 only.

56. 111022-27888 - Umerkot - ACTED officials distributed the aid to those only who have 10 or more children while ignoring a large amount of affectees in the process.

57. 111017-22192 - Umerkot - ACTED in charge is distributing tokens for a bribe of Rs. 500 to Rs. 1000. Some of the people received aid multiple times due to this practice.

58. 111013-42222 - Kashmore - ACTED is demanding a bribe of Rs. 2000 for the registration of reconstruction of each house.

59. 111008-10564 - Umerkot - ACTED officials distributed aid on the recommendation of landlords while ignoring the deserving affectees in the process.
60. 111008-99621 - Umerkot - ACTED officials colluded with the people from the neighboring village and distributed aid that was meant for the complainant’s village amongst the former.

List of complaints related to Solicitation of bribe, kickbacks or favors

1. 111223-38100 - Sanghar - NGO employees are charging bribes of Rs 1000 to 2000 to register names for reconstruction program in District Umer Kot.

2. 111119-62604 - Umerkot of ACTED is providing aid faster to those who are paying a bribe of Rs. 2000.

3. 111026-45583 - Sanghar - ACTED officials gave aid to those people only who belonged to the political party of the in-charge.

Complaint related to Procurement fraud

1. 111017-35460 - Umerkot - ACTED officials sold relief tokens for rations for bribes ranging from Rs. 500 to Rs. 1000 and went to the villages with people who were well off and could buy the tokens while ignoring the villages of the deserving affectees.

List of aid requests

1. 111228-80239 - Kashmore - NGO employees deprived village of agricultural support consisting of DAP Urea and wheat seeds while distributing the relief in village that is 2 km away.

2. 111227-72695 - Umerkot - Complainant alleged the NGO staff of distributing packages containing flour, biscuits, blankets, cooking oil, pulses in the neighboring villages while ignoring complainants village on the basis of political affiliation.

3. 111223-76403 - Sanghar - Caller requested aid from NGO personnel to distribute flour, oil as they are distributing in the neighboring villages as well as under the reconstruction program.

4. 111222-84747 - Kashmore - NGO employees deprived village of agricultural support consisting of DAP Urea and wheat seeds while distributing the relief in village that is 3 km away.

5. 111220-55674 - Umerkot - NGO distributed flour, cooking, pulses once in Nov 2011. Complainant requests NGO to provide relief for the second time.
6. 111219-17909 - Umerkot - NGO employee [b](6), [b](?) [C] surveyed the village in Nov 2011 but did not provide relief consisting of flour, pulses, rice, oil and biscuits as they are distributing in neighboring villages.

7. 111217-12805 - Sanghar - Complainant alleged the NGO staff of distributing packages containing flour, biscuits, oil and biscuits in the neighboring villages while ignoring complainant's village on the basis of political loyalty.

8. 111209-14283 - Mirpur Khas - Complainants village has not been provided with relief consisting of 80kg flour, oil, pulses and biscuits while neighboring village was provided with the relief goods in Oct 2011

9. 111201-03615 - Umerkot - NGO is distributing food relief consisting of oil, flour and pulses in neighboring villages depriving the complainant's village.

Complaint marked as "other"

1. 111017-54805 - Umerkot - Relates to food distribution for flood victims in Taluka Pithoro District Umerkot (Incomplete complaint details).

Copies of individual complaints are available upon request and bona fide need.
MEMORANDUM

TO: Kathrin Lauer, Food for Peace Officer, USAID Pakistan
FROM: Special Agent in Charge (E&E-A)
Subject: Complaints regarding the Agency for Technical Cooperation and Development (ACTED) for the Quarter of Oct-Dec 2011

This memorandum shall serve as an official referral of complaints received by USAID OIG Pakistan Anti-Fraud Hotline from October 1, 2011 to December 31, 2011, regarding ACTED in Pakistan. ACTED, in collaboration with FAO and WFP has been involved in providing emergency relief services in the form of food, agricultural aid, shelter and settlements to areas that were affected by unprecedented flooding in the summer of 2011. Due to ACTED’s role in providing food relief services on behalf of UNWFP (funded by USAID), this information is being provided for your review. This data will also be provided to UNWFP.

During the last quarter of 2011 (October to December) the USAID OIG Pakistan Anti-Fraud Hotline (AFH) received a total of 74 complaints regarding ACTED. The majority of the complaints alleged ACTED failed to provide services as promised due to discontinuation of goods, complainants not being provided with emergency relief goods, preferential distribution of goods, and NGO personnel seeking bribes.

Of the total 74 complaints, 60 complaints pertain to service and delivery issues, 3 complaints regard solicitation of bribes, 1 complaint accuses NGO personnel of procurement fraud, and 1 complaint is marked as “other”. Additionally, there are also 9 aid requests. Several complaints refer to “tokens”, or receipts, given to persons deemed eligible to receive food or shelter relief at the time of registration by the implementing partner. The tokens are later returned to the implementer at the time distribution of relief occurs.
The below chart provides a breakdown of complaints according to allegation type.

![Allegation type breakdown chart](chart.png)

All the complaints originated from Sindh, Pakistan and are broken down as follows:

**Service Delivery**

Sixty complaints from Sindh (Jacobabad 4, Kashmore 3, Sanghar 36, Shikarpur 2, Umer Kot 15)

The majority of the complainants alleged that the NGO personnel discontinued relief without any notification even after having committed to provide relief for several months (such complaints totaled 22). Eleven complaints indicated preferential distribution of goods and 9 complaints allege NGO personnel’s failure to provide any relief. The majority of the complaints (42 out of 60) regarded service delivery as either related to preferential distribution, discontinuation of services, or affected citizens not being provided with any sort of relief.

![Complaint Summary chart](chart.png)

The remaining complaints were a mix of several issues and the summary is as follows:
<table>
<thead>
<tr>
<th>Summary of Complaints</th>
<th># of Complaints</th>
<th>Allegation Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Preferential Distribution/ Officials seeking bribes</td>
<td>1</td>
<td>Service Delivery</td>
</tr>
<tr>
<td>Improper or unjust distribution of goods</td>
<td>2</td>
<td>Service Delivery</td>
</tr>
<tr>
<td>Discontinuation of relief goods/ Fake registration of</td>
<td>1</td>
<td>Service Delivery</td>
</tr>
<tr>
<td>names</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Discontinuation of relief goods/ Officials seeking bribes</td>
<td>1</td>
<td>Service Delivery</td>
</tr>
<tr>
<td>Improper distribution of tokens</td>
<td>2</td>
<td>Service Delivery</td>
</tr>
<tr>
<td>Improper distribution of goods</td>
<td>1</td>
<td>Service Delivery</td>
</tr>
<tr>
<td>Incomplete distribution of goods</td>
<td>3</td>
<td>Service Delivery</td>
</tr>
<tr>
<td>Incomplete construction work</td>
<td>1</td>
<td>Service Delivery</td>
</tr>
<tr>
<td>Officials seeking bribe to reconstruct houses</td>
<td>1</td>
<td>Service Delivery</td>
</tr>
<tr>
<td>Official selling food tokens</td>
<td>1</td>
<td>Service Delivery</td>
</tr>
<tr>
<td>Officials involved in collusion</td>
<td>1</td>
<td>Service Delivery</td>
</tr>
<tr>
<td>Reconstruction relief not provided</td>
<td>2</td>
<td>Service Delivery</td>
</tr>
<tr>
<td>Food tokens distributed on the basis of bribery</td>
<td>1</td>
<td>Service Delivery</td>
</tr>
</tbody>
</table>

**Solicitation of Bribe, Kickbacks or Favors**

Three complaints from Sindh (Umer Kot 1, Sanghar 2)

All the complaints were made against different NGO personnel. They were alleged to have sought Rs.1000 to 2000 to register citizens for a reconstruction program. One person is reported to have been asking Rs.2000 to expedite the process of relief.

**Procurement Fraud**

One complaint received from Sindh (Umer Kot)

Three charges are made against NGO personnel.

1. Preferential distribution of goods.
2. Selling relief tokens for Rs. 500, 700 & 1000, causing up to Rs 7 million of fraud.
3. Distributing relief goods assigned to the residents of Taluka Pithoro to the residents of other districts.

**Aid Requests**

Nine aid requests from Sindh (Umer Kot 4, Sanghar 2, Kashmore 2, MirPur Khas 1)

**Allegations regarding ACTED Staff**
NGO employee Name: Dost Mohammad Rajar

During the quarter October to December 2011, 27 complaints were registered against ACTED. All the complaints originating against are from of which 25 are pertinent to service and delivery, one complaint related to solicitation of bribe, and one being an aid request.

There were 19 occasions where was reported to have been the reason for discontinuation of relief goods without notice. Of the 19 complaints, some complaints indicated false registration of names and solicitation of bribes as being the reason for discontinuation. Several other allegations were made against with the breakdown as follows: 4 complaints allege the official the preferential distribution of goods, 1 complaint alleges improper distribution of goods, 1 complaint indicates incomplete distribution and 1 highlighted non-provision of relief.

Complaint # 111229-67639 reports an allegation against along with another official named to have been responsible for discontinuation of relief goods in the food assistance category. This makes a total of 27 complaints made against

List of complaints against ACTED official along with complaint #'s for tracking purposes

<table>
<thead>
<tr>
<th>Complaint#</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>111231-47161</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111231-95381</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111230-89923</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111229-58350</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111229-61922</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111229-75399</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111228-98522</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111226-60236</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111221-05544</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111130-21480</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111130-49182</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111128-19485</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111126-97914</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111124-39576</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111124-21458</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111124-42053</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111229-67639</td>
<td>Discontinuation of relief goods</td>
</tr>
<tr>
<td>111230-90808</td>
<td>Discontinuation of relief goods/ Fake registration of names</td>
</tr>
<tr>
<td>111230-82932</td>
<td>Discontinuation of relief goods/ Officials seeking bribery</td>
</tr>
<tr>
<td>111220-15480</td>
<td>Preferential distribution of goods</td>
</tr>
</tbody>
</table>
NGO Official Name: [Redacted]

Two complaints were received regarding [Redacted] both of which regard service delivery issues related to non-food items.

<table>
<thead>
<tr>
<th>Complaint#</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>111214-58838</td>
<td>Did not receive relief goods</td>
</tr>
<tr>
<td>111028-28095</td>
<td>Reconstruction relief not provided</td>
</tr>
</tbody>
</table>

NGO Official Name: [Redacted]

Two complaints were received regarding [Redacted] for unfair distribution of goods.

<table>
<thead>
<tr>
<th>Complaint#</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>111025-83838</td>
<td>Did not receive relief goods / Improper distribution</td>
</tr>
<tr>
<td>111022-27888</td>
<td>Did not receive relief goods/ Unfair distribution</td>
</tr>
</tbody>
</table>

The selection of the above officials is made primarily due to the number of complaints or allegations received against them. There are several other names which have only been reported once thus not making it to this list. However, the information regarding the remaining officials can be furnished upon request.

Complaint Summaries

The following document is sequenced in the following order:

- List of complaints related to service delivery issues (total of 60 complaints)
- List of complaints related to solicitation of bribe, kickbacks or favors (total of 3 complaints)
- List of complaints related to procurement fraud (1 complaint)
- List of aid requests (9 aid requests)
- List of complaints marked as “other” (1 complaint)
List of Complaints related to Service Delivery

1. 111231-19541 - Sanghar - NGO committed to provide food relief (flour, oil, pulses and rice) three times but they only distributed relief once in the month of Oct 2011.

2. 111231-47161 - Sanghar - NGO employee committed to provide relief for three months but only provided once in the month of Nov 2011.

3. 111231-95381 - Sanghar - NGO committed to provide food relief (80 kg flour, 2 kg cooking oil, 4 kg pulses, chocolates and biscuits) for three months, but they only provided once in the month of Nov 2011.

4. 111230-89923 - Sanghar - NGO employee committed to provide relief (flour, oil, pulses and biscuits) for three months but provided twice in Oct and Nov 2011.

5. 111230-37112 - Sanghar - NGO employee committed to provide relief (rice, flour, cooking oil and biscuits) three times, but provided only once in Oct 2011.

6. 111230-90808 - Sanghar - NGO employee committed to provide relief (flour, oil, biscuits and chocolates) for three months but provided once in Oct 2011. NGO employee also registered 50 to 60 fake names of people who did not exist in the village.

7. 111230-82932 - Sanghar - NGO employee registered 3 villagers out of 35 and committed to provide relief (oil, flour, biscuits) three times but provided only once in Oct 2011. NGO staff also seeking bribery of Rs 500 to 1000 against each token.

8. 111229-58350 - Sanghar - NGO employee registered 3 villagers out of 10 and committed to provide relief (oil, flour, pulses and biscuits) three times but he provided only once in Nov 2011.

9. 111229-61922 - Sanghar - NGO employee registered 24 villagers out of 32 and committed to provide relief (oil, flour, pulses) three times but provided only once in Nov 2011.

10. 111229-67639 - Sanghar - NGO employee provided food relief (oil, flour, pulses, rice and biscuits) only once in Oct 2011 contrary to their commitment of provided relief for three consecutive months.

11. 111229-75399 - Sanghar - NGO employee committed to provide relief (flour, oil, rice, biscuits and chocolates) for three months but provided only once in Oct 2011.
12. **111228-25256** - Umerkot - NGO staff distributed 80 kg flour, 4.5 liters of oil, 1 packet salt, biscuits and chocolates but pulses were missing. NGO also committed to provide ration for three months but they provided for one month in Oct 2011.

13. **111228-98522** - Sanghar - NGO employee committed to provide (50 kg rice, 30 kg flour, 5 kg oil and biscuits) for three months but they only provided once in Oct 2011 saying that the village's name is rejected.

14. **111227-32237** - Umerkot - NGO staff and in charge distributed flour, rice bags, cooking oil, pulses and biscuits in Nov 2011 among 20 affectees out of 30, leaving the remaining ten deprived of relief.

15. **111226-60236** - Sanghar - NGO employee committed to provide relief (flour, oil, biscuits) for three months but provided only once in Oct 2011.

16. **111224-20274** - Umerkot - NGO left two affected villagers out while distributing relief consisting of oil, flour, pulses and biscuits in the month of Nov 2011.

17. **111223-11694** - Sanghar - NGO personnel ignored the complainant and few other affected villagers in the second round of food distribution in Dec 2011 comprising of flour, pulses, cooking oil, biscuits and tea.

18. **111220-15480** - Sanghar - NGO employee gave food tokens to 21 houses out of 150 for ration in Oct 2011, and in the first week of Dec 2011 they took the tokens back without any reason.

19. **111219-62006** - Sanghar - NGO employee ignored 100 poor affectees of the village in the second round of distribution of relief consisting of 80kg flour, 8 kg pulses, 5 liter oil and 5 packets of biscuits in Nov 2011.

20. **111219-08406** - Jacobabad - NGO surveyed the complainants village in July 2011 for reconstruction program and committed to provide relief to rebuild houses which is yet to be provided.

21. **111215-70005** - Jacobabad - NGO registered 12 houses under reconstruction program. All the houses have been built except for two which are still incomplete, NGO provided the incomplete houses with 500 bricks while doors, roofs and other material is still pending.

22. **111215-04333** - Sanghar - NGO employees deprived 20 villagers of relief consisting of 80kg flour, 8kg pulses and biscuits in July and Nov 2011. Complainant alleged the NGO staff distributing relief on the recommendation of influential people.
23. 111214-58838 – Shikarpur - Complainant was not able to get registered due to loss of ID card for relief consisting of 1 goat, 8 hens, 1 cock and PDI's relief of cash 6000 for pots and Rs. 2000 to be paid each month for three months.

24. 111210-55534 – Umerkot - Food relief consisting of 40kg flour, 50kg rice, 5 liter oil, pulses and biscuits was distributed to 70 villagers in the month of Oct and Nov 2011 leaving 130 villagers with no relief.

25. 111210-79833 – Umerkot - NGO distributed 80kg flour, 5kg pulses, 60 packets of biscuits and 5 liters oil among 25 villagers out of 200 in Oct 2011 leaving 175 villagers deprived of relief.

26. 111210-65615 – Sanghar - NGO did not provide committed relief of 1 month ration

27. 111210-95022 – Umerkot - Complainant requests for aid consisting of 8kg pulses, 10 kg rice bags, 20kg flour, 5kg cooking oil and 1 kg salt as it was distributed in the neighboring village in Oct 2011. Distribution happening on the basis of favoritism.

28. 111207-51885 – Sanghar - Complainant's village was ignored in the second round of relief distribution in the month of Nov 2011. Relief consisted of 2 bags of flour, 5kg oil, 8kg pulses and biscuits.

29. 111201-55328 – Sanghar - Complainant’s UC was deprived of food relief due to political reasons. ACTED and DEVCON distributing non-food items on the basis of political affiliation in his village.

30. 111201-05544 – Sanghar - NGO employee committed to provide food relief consisting of 5 liter oil, 80kg flour, 8kg pulses for three months but only managed to provide once in Oct 2011.

31. 111130-72432 – Kashmore - Under livestock program NGO distributed goats, hens, hen feed and agricultural support packages in complainant's village while depriving 10 villagers who did not receive anything.

32. 111130-21480 – Sanghar - NGO distributed food package consisting of oil, pulses, flour and sugar in Oct 2011, and recently started second round of distribution but it is being given to villagers with new tokens, complainant is being ignored because has old token and new is not being issued.

33. 111130-49182 – Sanghar - NGO employee distributed food items (flour, cooking oil, and sugar) only once while the neighboring villages are being provided two to three times.
34. 111129-48696 -- Sanghar - NGO registered the names of affectees in Sept 2011 and distributed relief (5 liter oil, 75kg flour, 40 packets of biscuits, 1 pack of salt and 1 packet of red chilli) twice, but they ignored 40 poor affectees.

35. 111129-16234 -- Kashmore - Complainant wants to know why four people only were selected by ACTED and given the aid while the other affected were ignored.

36. 111128-19485 -- Sanghar - ACTED officials registered the affectees and provided the aid once and committed to provide relief once more but told the affectees to register themselves again in order to receive the aid for the second time.

37. 111126-97914 -- Sanghar - ACTED officials gave the aid once and committed to provide it three months but failed to show up for the second and third rounds of distribution.

38. 111125-74503 -- Sanghar - The number of affected registered by ACTED for tokens of ration is less than the tokens distributed.

39. 111125-38926 -- Jacobabad -- (ACTED official) is demanding a bribe of Rs. 500 against the tokens for reconstruction. Apart from that, 10 people have been registered for the aid because of their connections with the influential people and 45 of the registered affectees have been ignored.

40. 111124-98082 -- Sanghar - ACTED officials registered 70 affectees but none of them have received any relief yet.

41. 111124-39576 -- Sanghar - First distribution by ACTED officials was done fairly while the second was done on the basis of favoritism.

42. 111124-21458 -- Sanghar - ACTED officials gave relief items first time around but they refused to give it the second time saying that name of the registered affected has been deleted from the system.

43. 111124-42053 -- Sanghar - ACTED officials distributed the aid twice but during the second distribution they took some of the names off the list and refused to give aid to them.

44. 111124-54209 -- Umerkot - ACTED officials distributed aid on the recommendation of the area’s landlords, MPA and MNA.

45. 111124-72980 -- Sanghar - First distribution by ACTED officials was done fairly while the second was done on the basis of favoritism.

46. 111123-35075 -- Umerkot - ACTED officials asked to give away the relief items but is doing this distribution on the basis of favoritism and giving away flour and pulses only to the affectees while withholding the rest of the items.
47. 111122-26773 - Sanghar - ACTED officials gave away the aid to two people only and committed to return to provide the relief to rest of the registered affectees. When they came back, they told the registered affectees that they have distributed the items to newly registered people. Complainant has no information of the newly registered who received the relief.

48. 111122-57075 - Jacobabad - ACTED officials are implementing food distribution, reconstruction and livestock programs but ignoring the complainant’s village although they are equally affected due to floods.

49. 111121-06364 - Umerkot - ACTED officials distributed aid so that some of the people did not receive flour while the others did not get cooking oil. Also, aid was not given to those whose homes were unaffected but they were in need of relief items.

50. 111116-76938 - Sanghar - ACTED officials have not distributed the relief amongst many of the registered affectees.

51. 111105-34698 - Sanghar - ACTED officials provided relief to 3 affectees only while ignoring the remaining 400 affectees of the complainant’s village.

52. 111105-75568 - Sanghar - ACTED officials distributed NFI items to the affectees on the recommendation of influential people. They registered the names of some of the dead people and received aid on their behalf.

53. 111029-57724 - Umerkot - ACTED field in charge demanded a bribe of Rs. 1000 for the issuance of tokens.

54. 111028-28095 - Shikarpur - ACTED officials registered 54 affectees for the implementation of reconstruction program but they provided aid to two people only.

55. 111025-83838 - Umerkot - ACTED officials registered 50 affectees but distributed aid to 4 only.

56. 111022-27888 - Umerkot - ACTED officials distributed the aid to those only who have 10 or more children while ignoring a large amount of affectees in the process.

57. 111017-22192 - Umerkot - ACTED in charge is distributing tokens for a bribe of Rs. 500 to Rs. 1000. Some of the people received aid multiple times due to this practice.

58. 111013-42222 - Kashmore - ACTED is demanding a bribe of Rs. 2000 for the registration of reconstruction of each house.

59. 111008-10564 - Umerkot - ACTED officials distributed aid on the recommendation of landlords while ignoring the deserving affectees in the process.
60. 111008-99621 – Umerkot - ACTED officials colluded with the people from the neighboring village and distributed aid that was meant for the complainant’s village amongst the former.

List of complaints related to Solicitation of bribe, kickbacks or favors

1. 111223-38100 – Sanghar - NGO employees are charging bribes of Rs 1000 to 2000 to register names for reconstruction program in District Umer Kot.

2. 111119-62604 - Umerkot of ACTED is providing aid faster to those who are paying a bribe of Rs. 2000.

3. 111026-45585 – Sanghar - ACTED officials gave aid to those people only who belonged to the political party of the in-charge.

Complaint related to Procurement fraud

1. 111017-35460 – Umerkot - ACTED officials sold relief tokens for rations for bribes ranging from Rs. 500 to Rs. 1000 and went to the villages with people who were well off and could buy the tokens while ignoring the villages of the deserving affectees.

List of aid requests

1. 111228-80239 – Kashmore - NGO employee deprived his village of agricultural support consisting of DAP Urea and wheat seeds while distributing the relief in village that is 2 km away.

2. 111227-72695 – Umerkot - Complainant alleged the NGO staff of distributing packages containing flour, biscuits, blankets, cooking oil, pulses in the neighboring villages while ignoring complainants village on the basis of political affiliation.

3. 111223-76403 – Sanghar - Caller requested aid from NGO personnel to distribute flour, oil as they are distributing in the neighboring villages as well as under the reconstruction program.

4. 111222-84747 – Kashmore - NGO employee deprived village of agricultural support consisting of DAP Urea and wheat seeds while distributing the relief in village that is 3 km away.

5. 111220-55674 – Umerkot - NGO distributed flour, cooking, pulses once in Nov 2011. Complainant requests NGO to provide relief for the second time.
6. 111219-17909 – Umerkot - NGO employee surveyed the village in Nov 2011 but did not provide relief consisting of flour, pulses, rice, oil and biscuits as they are distributing in neighboring villages.

7. 111217-12805 – Sanghar - Complainant alleged the NGO staff of distributing packages containing flour, biscuits, oil and biscuits in the neighboring villages while ignoring complainant’s village on the basis of political loyalty.

8. 111209-14283 – Mtrpur Khas - Complainants village has not been provided with relief consisting of 80kg flour, oil, pulses and biscuits while neighboring village was provided with the relief goods in Oct 2011.

9. 111201-03615 – Umerkot - NGO is distributing food relief consisting of oil, flour and pulses in neighboring villages depriving the complainant’s village.

Complaint marked as “other”

1. 111017-54805 – Umerkot – Relates to food distribution for flood victims in Taluka Pithoro District Umerkot (Incomplete complaint details).

Copies of individual complaints are available upon request and bona fide need.

Cc: Andrew Sisson, Mission Director, USAID Pakistan
Dominique Frankefort, UNWFP Pakistan