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Description of document: Letter correspondence between the Export-Import Bank of the United States (EXIM) and the Government Accountability Office (GAO) during CY 2014 – CY 2017

Requested date: 13-March-2017

Release date: 22-February-2019

Posted date: 26-August-2019

Source of document: US Government Accountability Office  
Chief Quality Officer  
Room 5K21  
441 G Street NW  
Washington, DC 20548  
Fax: 202-512-5806  
Email: [RecordsRequest@gao.gov](mailto:RecordsRequest@gao.gov)

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U.S. GOVERNMENT ACCOUNTABILITY OFFICE

441 G St. N.W.  
Washington, DC 20548

PRI-19-006

February 22, 2019

Via Email

Please refer to your March 13, 2017, request to the Export-Import Bank of the United States (Ex-Im Bank) for a copy of all letter correspondence between Ex-Im Bank and the Government Accountability Office (GAO) during calendar years 2015, 2016, and 2017 to date. On October 4, 2018, Ex-Im Bank referred your request and 415 pages of documents to this office for review, release determination and direct response to you.

Your letter refers to the Freedom of Information Act (FOIA), 5 U.S.C. § 552. As an agency responsible to the Congress, GAO is not subject to FOIA. However, GAO's disclosure policy follows the spirit of the act consistent with GAO's duties and functions as an agency with primary responsibility to the Congress. We are enclosing for your information a copy of our regulations concerning the availability of GAO records to the public, which are contained in 4 C.F.R. Part 81 (2018). (Enclosure I)

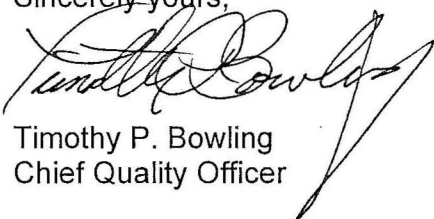
Enclosure II is a list of the referred records, along with copies of the releasable records. Please note that during our review, we located 30 pages of duplicative documents, which are not included in our final release. Further, as noted on the list of records, we redacted portions of and/or withheld documents on the basis of 4 C.F.R. § 81.6(f), which exempts from release personnel and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy; and 4 C.F.R. § 81.6(j), which protects records that are part of the deliberative process.

In regards to items 2, 3, 5, 6, 8-10, and 18, some redactions were made to these records pursuant to FOIA exemptions: 5 U.S.C. § 552(b)(5) and/or (b)(6) by Ex-Im Bank prior to their referral of the records to GAO. Additionally, it is GAO's policy not to release records from its files that originate in another agency or organization, and accordingly, we withheld an attachment to item 17 of the list of records. See 4 C.F.R. § 81.5(a). For a copy of this document and/or submit an appeal, you must contact Ex-Im Bank at the following address:

- Ex-Im Bank of the United States  
Attention: Assistant General Counsel for Administration  
811 Vermont Avenue, NW  
Washington, DC 20571  
Phone: (202) 565-3290  
Email: [FOIA.Appeals@exim.gov](mailto:FOIA.Appeals@exim.gov)  
(The phrase "FOIA APPEAL" should appear on the letter/email)

Finally, in accordance with 4 C.F.R. § 81.4(d), further consideration of your request—to the extent that it has been denied—may be obtained by an appeal letter to the Comptroller General of the United States setting forth the basis for your belief that the partial denial of your request is unwarranted.

Sincerely yours,



Timothy P. Bowling  
Chief Quality Officer

Enclosures

**From:** [Schmitt, Christopher H](#)  
**To:** [Michaela Smith](#)  
**Cc:** [Cristopolis Diequez](#); [Martinez, Flavio J](#)  
**Subject:** GAO review of Export-Import Bank anti-fraud controls (101197)  
**Date:** Thursday, December 15, 2016 12:00:41 PM  
**Attachments:** [ALL STAFF-#1751675-v2-101197 EX-IM BANK PRE-ENTRANCE INFORMATION REQUEST.DOCX](#)

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Dear Michaela,

Greetings, I am the analyst-in-charge for this GAO engagement, for which Cris Diequez said you would be our lead liaison. I write for a couple of reasons.

First, because the holidays are pushing off normal scheduling of our entrance conference, Cris offered us the opportunity to submit a pre-entrance conference request for information. We appreciate that, and please find the request attached. Hopefully, it is self-explanatory, but please get back to me with any questions/clarifications.

And second, I just wanted to contact you generally as we begin this work. If you'd like to discuss our review or get any information ahead of the entrance conference, we are happy to do that, at your convenience. We look forward to working with you.

Thank you, and best regards,

CHS

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Christopher H. Schmitt  
Senior analyst  
U.S. Government Accountability Office  
441 G Street NW  
Washington, DC 20548

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**From:** [Halpern, Kay L](#)  
**To:** [Inci Tonguch-Murray](#); [Cowles, Adam R](#)  
**Cc:** [Cristopolis Diequez](#); [James Mahoney](#); [Gianopoulos, Kimberly M](#); [Alley, Ashley G](#)  
**Subject:** RE: ExIm revised E&E dual use guidance  
**Attachments:** [ExIm E&E Implementation of Dual Use policy.doc](#)

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Inci,

Thank you for sharing the revised E & E dual use guidance with us. It does address some of the issues raised in our report and in our recommendation. Here are some things we think would improve it:



Best,

--Kay



**From:** Inci Tonguch-Murray [mailto:[inci.tonguch-murray@exim.gov](mailto:inci.tonguch-murray@exim.gov)]  
**Sent:** Friday, October 03, 2014 11:06 AM  
**To:** Halpern, Kay L; Cowles, Adam R  
**Cc:** Cristopolis Dieguez; James Mahoney  
**Subject:** ExIm revised E&E dual use guidance

Hello Kay and Adam,

Kay, as I had discussed with you earlier this week, I am providing the revised E&E guidance on implementation of the dual use policy. We believe this addresses the recommendation from the GAO report. If you concur, the revised guidance will be distributed to the E&E and other appropriate Bank management and staff. In addition, the Bank's status update to Congress is due near the end of this month and any feedback from GAO would be appreciated prior to that if possible.

Please let us know if you have any questions or concerns.

Thank you,  
Inci  
(202) 565-3356

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From: Simon, Michael J [mailto:81.6(f)]

Sent: Friday, May 08, 2015 10:56 AM

To: Inci Tonguch-Murray; Cristopolis Dieguez

Cc: David M. Sena

Subject: EXIM Exit Review for GAO 100027 - U.S. and Chinese Economic Engagement in Southeast Asia.

Please see attached for the Statement of Facts for agency exit review for GAO Engagement 100027: U.S. and Chinese Economic Engagement in Southeast Asia.

This Statement of Facts encompasses all aspects of our study; Ex-Im information and actions are discussed on pages 30-33 and 41

We can receive your comments in writing, by teleconference, or in an in-person meeting. Please let us know your preference.

In any event, we would like to receive your comments on or before May 22, 2015

As a reminder, please note that this material is being provided to confirm that the critical facts and key information used to formulate GAO's analyses and findings are current, correct, and complete. This written material is subject to revisions; accordingly, recipients of this material must not, under any circumstances, show or release its contents for purposes other than review from those with responsibility for the subjects it discusses. It must be safeguarded to prevent publication or other improper disclosure of the information it contains. This material and all copies of it remain the property of the Government Accountability Office and must be destroyed or returned on demand.

Please call/reply with any questions.

Michael J. Simon, Senior Analyst

International Affairs & Trade

U.S. Government Accountability Office

441 G Street, NW Washington, DC 20548

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**From:** Halpern, Kay L [mailto:81.6(f)]  
**Sent:** Tuesday, March 10, 2015 3:31 PM  
**To:** Goda McEachern  
**Cc:** Inci Tonguch-Murray; Cowles, Adam R; Alley, Ashley G; Tran, Hai V; De Alteriis, Martin H  
**Subject:** FOLLOW UP TO ENTRANCE CONFERENCE - GAO ENGAGEMENT 321058

Hi Goda,

In addition to my email of March 5 (attached/forwarded below for your convenience), I have a few additional questions as a follow up to our entrance conference of February 26:

- (1) can you send electronic versions of the hard copy documents you provided us? To recap, these documents are:
- One-page screen print of file structure within Ex-Im dual-use master electronic folder
  - One-page printout from Ex-Im database of all dual-use transactions authorized in FY2014, showing “no results”
  - Eutelsat technical operating reports detailing end use – 3 reports, dated July 28, 2014, July 29, 2014, and February 4, 2015
  - Documents related to the Mexico satellite transaction:
    - February 12, 2015 email from Boeing to Ex-Im
    - January – February 2015 email correspondence between Ex-Im and Mexican government officials
    - January 31, 2015 combined progress and technical operating report covering all 3 Mexico satellites, with cover letter from the Mexican government
    - June 20, 2014 combined progress and technical operating report covering all 3 Mexico satellites.
- (2) The following questions pertain to the Mexico satellites:

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(3) We would also like to set up a time to have the appropriate officials walk us through the Dual Use Master Folder files. The following times would work – please let me know which time works best for Ex-Im:

- This Thurs 3/12, any time between 10 am – 2 pm
- Mon 3/16, any time after 11 am
- Tues 3/17, between 10 am – 12 pm
- Wed 3/18, between 10 am – 12 pm
- Thurs 3/19 or Fri 3/20 – any time after 10 am

Thanks,

--Kay

Kay Halpern  
Senior Analyst  
International Affairs and Trade Team  
U.S. Government Accountability Office

81.6(f)



**From:** Halpern, Kay L  
**Sent:** Thursday, March 05, 2015 2:54 PM  
**To:** 'Goda McEachern'; Cowles, Adam R  
**Cc:** James Mahoney; Inci Tonguch-Murray; 'cristopolis.dieguez@exim.gov'; Alley, Ashley G  
**Subject:** RE: Dual-Use Monitoring Entrance Conference/Requested Information

Thanks for this email, Goda. (I hope you are teleworking and enjoying the snow through a window at home, as am I, and do not have to deal with a commute home!)

I will be emailing follow up questions to our entrance conference either later today or tomorrow.

**I do have one question now, though, regarding the revised 1997 dual-use implementation memo:** the electronic version you sent with this email is dated September 30, and is the same memo that Mr. Mahoney handed us last week; it is also the same memo (minus the 2 bolded paragraphs in the beginning re the expiration of Ex-Im's dual-use authority) that Inci sent us on October 3 last year. **However, this Sept 30 revision is not the most recent version of this memo.** In her Oct 3 email, Inci noted that any feedback from GAO would be appreciated. On Oct 15, we provided feedback on the Sept 30 memo. On Oct 27, Cris sent us a further revised memo in response to our feedback; this new memo was dated Nov 3. The relevant emails are attached. To recap, they are:

--Oct 3, 2014 email from Inci with revised 1997 dual-use implementation memo, dated September 30, 2014.

--Oct 15 email from GAO with feedback on this Sept 30 memo.

--Oct 27 email from Cris with further revised memo, dated November 3, 2014.

My question: has Ex-Im rejected the Nov 3 version, or is the Sept 30 version an error? If the latter is correct and Ex-Im intends to use the Nov 3 version, which version did Ex-Im disseminate to its staff and file in its records?

--Kay

Kay Halpern  
Senior Analyst  
International Affairs and Trade Team  
U.S. Government Accountability Office

81.6(f)

**From:** Goda McEachern [<mailto:Goda.McEachern@exim.gov>]  
**Sent:** Thursday, March 05, 2015 1:19 PM  
**To:** Cowles, Adam R; Halpern, Kay L  
**Cc:** James Mahoney; Inci Tonguch-Murray  
**Subject:** Dual-Use Monitoring Entrance Conference/Requested Information

Dear Kay and Adam,

Please find attached the items that we discussed in the Dual-Use Monitoring Entrance Conference:

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Kind regards,

Goda  
Office of the Chief Financial Officer  
Export-Import Bank of the United States  
811 Vermont Ave. N.W., Washington DC 20571-0002  
[Goda.mceachern@exim.gov](mailto:Goda.mceachern@exim.gov)  
202-565-3384 (desk)  
202-731-7600 (cell)

**From:** [Cristopolis Diequez](#)  
**To:** [Halpern, Kay L](#); [Cowles, Adam R](#)  
**Cc:** [Inci Tonguch-Murray](#)  
**Subject:** Ex-Im Bank - Revised Dual Use Instructions  
**Date:** Monday, October 27, 2014 3:10:21 PM  
**Attachments:** [Ex-Im Bank Dual Use Instructions 21OCT2014.doc](#)

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Dear Kay and Adam,

Please find attached the Ex-Im Bank's updated Dual Use Instructions and an email below from Jim Mahoney, VP of Engineering and Environment with clarifications regarding the updates that were made.

Thanks,

Cris

Cristopolis Diequez  
 Business Compliance Analyst  
 Office of the Chief Financial Officer  
 Export Import Bank of the United States  
[cristopolis.diequez@exim.gov](mailto:cristopolis.diequez@exim.gov)  
 202-565-3957 (office)  
 202-390-5269 (mobile)

\*\*\*

Thank you for providing the Export-Import Bank of the United States with comments on the proper implementation of the Dual Use Policy. The revisions made to the Staff Memorandum were a direct result of recommendations contained in the recently issued GAO report on its review of the Ex-Im Bank Dual Use Policy.

We have taken into consideration the additional comments provided to the revised Memorandum, and we subsequently revised it a second time in order to account for the five points you raised.

Specifically addressing or clarifying the following areas:

- (b) (5) [REDACTED]  
 [REDACTED]  
 [REDACTED]

- (b) (5) [REDACTED]  
[REDACTED]
- (b) (5) [REDACTED]  
[REDACTED]
- (b) (5) [REDACTED]  
[REDACTED]  
[REDACTED]
- (b) (5) [REDACTED]  
[REDACTED]  
[REDACTED]

We found the GAO review of the Bank's Dual-Use policy to be particularly useful in that it helped clarify the requirements for effective monitoring of dual-use transactions as well as the need for improvements in the Bank's procedures for documenting information relative to dual use transactions.

Finally, we wish to note that Ex-Im Bank appreciates GAO's professionalism and courtesy throughout this review which facilitated a constructive experience for the Bank.

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**From:** Salinas, Heather L [mailto:81.6(f)]  
**Sent:** Wednesday, August 10, 2016 1:15 PM  
**To:** Goda McEachern; Cristopolis Dieguez  
**Cc:** Cowles, Adam R; Gianopoulos, Kimberly M; Alley, Ashley G; David M. Sena  
**Subject:** Draft Report entitled Export-Import Bank: Status of Dual-Use Exports as of August 2016 (GAO #100967)

August 10, 2016

The Honorable Fred P. Hochberg  
Chairman and President  
Export-Import Bank of the United States

Dear Mr. Chairman,

Attached is a copy of our proposed report entitled *Export-Import Bank: Status of Dual-Use Exports as of August 2016* (GAO-16-844R). We are providing this draft for your review and comment before the report is issued. Our work was done under engagement code 100967.

We would like to obtain the department's written or oral comments from you or your designated representative by August 24, 2016. These comments will be reflected in the final report. We prefer written comments and request that the written comments be provided electronically. However, we will accept comments provided in hard copy, orally, or in an unsigned e-mail message. Please direct all comments and any questions you may have concerning this draft to Heather Salinas, Analyst-in-Charge, 81.6(f)

This draft has not been fully reviewed within GAO, is subject to change, and must be safeguarded to prevent its improper disclosure. Please do not show or release its contents for any purpose. All drafts remain the property of GAO. Upon request, all electronic copies of drafts must be destroyed and any hard copies of drafts must be returned. We appreciate your cooperation in this matter.

Sincerely yours,

Kimberly Gianopoulos  
Director, International Affairs and Trade Team

Attachment

















**From:** Halpern, Kay L [mailto:81.6(f)]  
**Sent:** Wednesday, April 29, 2015 6:25 PM  
**To:** Goda McEachern  
**Cc:** Cowles, Adam R  
**Subject:** FW: ENGINEER'S DETERMINATION AS PER SECTION (F) OF MARCH 11 REVISED DUAL-USE POLICY MEMO

Thanks, Goda. Any questions I have on this I will ask Sam when I speak with him tomorrow,

--Kay

**From:** Goda McEachern [mailto:Goda.McEachern@exim.gov]  
**Sent:** Wednesday, April 29, 2015 4:49 PM  
**To:** Halpern, Kay L  
**Subject:** RE: (b) (5) OF MARCH 11 REVISED DUAL-USE POLICY MEMO

Hi Kay,

(b) (5)

Thanks,  
 Goda

**From:** Halpern, Kay L [mailto:81.6(f)]  
**Sent:** Wednesday, April 29, 2015 3:18 PM  
**To:** Goda McEachern  
**Cc:** Cowles, Adam R; Alley, Ashley G  
**Subject:** RE: ENGINEER'S DETERMINATION AS PER SECTION (F) OF MARCH 11 REVISED DUAL-USE POLICY MEMO

Thanks, Goda

**From:** Goda McEachern [mailto:Goda.McEachern@exim.gov]  
**Sent:** Wednesday, April 29, 2015 3:08 PM  
**To:** Halpern, Kay L  
**Cc:** Cowles, Adam R; Alley, Ashley G  
**Subject:** RE: (b) (5) OF MARCH 11 REVISED DUAL-USE POLICY MEMO

Hi Kay,

(b) (5)

I am working on providing you with the answers for the remaining questions.

Thanks,  
 Goda

**From:** Halpern, Kay L [mailto:81.6(f)]  
**Sent:** Wednesday, April 29, 2015 2:28 PM  
**To:** Goda McEachern  
**Cc:** Cowles, Adam R; Alley, Ashley G  
**Subject:** RE: ENGINEER'S DETERMINATION AS PER SECTION (F) OF MARCH 11 REVISED DUAL-USE POLICY MEMO

Thanks for this, Goda. Just read Tiffin's statement and it is very thorough.

Since Tiffin now has the English translation of the Cameroon end-use certification and report, could you please send that to us, along with the original French version?

Also, has Sam written end-use statements for the Mexsat and Eutelsat projects, and if so, please send them as well.

Finally, two technical questions regarding the wording in point (f) of the revised memo: please have Nathalie Ray and her Ex-Im/OGC colleagues responsible for the other two fy2012 dual-use transactions confirm the following:

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Thanks,

--Kay

**From:** Goda McEachern [mailto:Goda.McEachern@exim.gov]  
**Sent:** Wednesday, April 29, 2015 1:36 PM  
**To:** Halpern, Kay L  
**Subject:** RE: (b) (5) MARCH 11 REVISED DUAL-USE POLICY MEMO

Hi Kay,

(b) (5)


Thanks,  
Goda

**From:** Halpern, Kay L [mailto:81.6(f)]

**Sent:** Thursday, April 23, 2015 4:41 PM

**To:** Goda McEachern

**Subject:** ENGINEER'S DETERMINATION AS PER SECTION (F) OF MARCH 11 REVISED DUAL-USE POLICY MEMO

Hi Goda,

Please have Sam and Tiffin indicate whether they have drawn up a statement and filed it in the dual-use folder system, as per section (f) of the revised, March 11, 2015 dual-use policy memo, and if so, could you please send me these statements? (Tiffin may have to wait until he has an English translation of the Cameroon end-use certification and report.) Here is the relevant excerpt from the memo (the full memo is also attached):

f. Within the first 120 days of each calendar year, a statement to be entered annually by the Engineer assigned to the Dual Use transaction containing a determination as to whether information received during the previous year, including information in the previous year's End-Use reports and/or any other reports, was adequate to demonstrate that the transaction complied (or failed to comply) with the specific requirements of the Bank's Dual Use policy as set forth in the financing agreement and the Bank's Charter.

Thank you,

--Kay

*Kay Halpern*

*Senior Analyst*

*International Affairs and Trade Group*

*U.S. Government Accountability Office (GAO)*

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**From:** Michaela Smith  
**To:** "Schmitt, Christopher H" [mailto:81.6(f)]  
**Subject:** FW: GAO 101197 -- Follow-up items from 1/10/17 entrance conference: Responses to 1, 2, 3, 6 (Revised)  
**Date:** Tuesday, February 21, 2017 3:18:41 PM  
**Attachments:** [crti transaction and enhanced due diligence guidelines 7.11.2016.pdf](#)  
[Claim manual 9-20-16-Version D - final.docx](#)

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Revised to include a response to #2. Remaining responses are forthcoming.

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**From:** Schmitt, Christopher H [mailto:81.6(f)]  
**Sent:** Thursday, February 02, 2017 9:08 AM  
**To:** Michaela Smith  
**Subject:** GAO 101197 -- Follow-up items from 1/10/17 entrance conference

Hi Michaela,

Thanks again for setting up this week's meetings. They were very helpful. Meanwhile, I also have the list of follow-up items, as we captured it, from our entrance conference on 1/10 – please see below. I don't think you've provided any of these yet, but please let me know if I've missed anything.

As always, let me know if something isn't clear.

Thanks,

CHS

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Follow-up items

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**From:** Cristopolis Dieguez  
**To:** Lennell Jackson  
**Subject:** Fw: Request for additional information (EXIM) – (b) (5)  
**Date:** Tuesday, April 11, 2017 11:51:12 AM  
**Attachments:** image001.png  
 ALL STAFF-#1394068-v1-100540 - EXIM RESPONSE DATA RELIABILITY.DOCX

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**From:** Ryan, Mark A [REDACTED]  
**Sent:** Tuesday, February 14, 2017 2:46 PM  
**To:** Cristopolis Dieguez  
**Cc:** Inci Tonguch-Murray; Panchishin, Ulyana S  
**Subject:** RE: Request for additional information (EXIM) – GAO conversions job (100540)

Cris:

We would greatly appreciate responses to the questions listed below (see attached for document cited in question 3a)

Thanks,

Mark

1. If EXIM has additional noncareer conversion cases (besides [REDACTED] case) that took place during the stated timeframe (October 1, 2015, through March 17, 2016), please provide us with the corresponding information (as shown above) and supporting documents for each of those conversions. Please also indicate if there no additional cases.
2. Did OPM require or request EXIM to take corrective actions after denying [REDACTED] conversion? If so, what were the corrective actions and what steps did EXIM take to implement them? If available, please provide supporting documentation, e.g. decision letters from OPM, documentation from EXIM
3. In August 2016, EXIM responded to questions we submitted regarding the reliability of conversions data EXIM reported to GAO (see attached)
  - a. Do the answers in the attached document (EXIM's earlier response) on data reliability also apply for conversion data EXIM is providing in response to questions on conversion cases OPM reviewed during the expanded scope (October 1, 2015, through March 17, 2016)?
  - b. To what extent does EXIM believe that conversion data compiled below in table 1 is complete and accurate (including both data provided by OPM and missing information provided by EXIM in response to question 1)? What is this opinion based on?

---

**From:** Cristopolis Dieguez [mailto:Cristopolis.Dieguez@exim.gov]  
**Sent:** Tuesday, February 14, 2017 2:37 PM  
**To:** Ryan, Mark A  
**Cc:** Inci Tonguch-Murray; Douglas Jr, Clifton G; Panchishin, Ulyana S  
**Subject:** FW: Request for additional information (EXIM) – (b) (5)

Dear Ryan,

Please see the information in the email thread below below

Please let me know if you need any further information

Thanks,

Cris

---

**From:** Dana Pinkney  
**Sent:** Tuesday, February 14, 2017 2:33 PM  
**To:** Cristopolis Dieguez  
**Subject:** RE: Request for additional information (EXIM) – (b) (5)

(b) (5), (b) (6)

Thank you!

**Dana E. Pinkney, MS** | Senior Human Capital Advisor  
Export-Import Bank of the United States  
811 Vermont Ave. NW, Office 1020 | Washington, DC 20571  
Tel 202 565 3327 | Fax 1 866 733 1841 | [dana.pinkney@exim.gov](mailto:dana.pinkney@exim.gov)  
[Twitter](#) | [LinkedIn](#) | [YouTube](#)

cid:image003.png@01D19A57 0D0A34E0



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**From:** [Schmitt, Christopher H](#)  
**To:** [Michaela Smith](#)  
**Subject:** GAO 101197 -- Delegated authority lending questions  
**Date:** Thursday, April 06, 2017 4:25:29 PM  
**Attachments:** [ALL STAFF-#2065356-v5-101197 DELEGATED AUTHORITY LENDER QUESTIONS 4-10-17.DOCX](#)

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Hi Michaela,

As promised, here are questions for our Monday meeting on delegated authority. Unless we run into you in the meantime, see you then.

Thanks,

CHS









**From:** [Schmitt, Christopher H](#)  
**To:** [Michaela Smith](#)  
**Cc:** [Oldmixon, Jonathon P](#); [Earl, Paulissa R](#); [Martinez, Flavio J](#)  
**Subject:** GAO 101197 -- Questions for 1/31 meeting with CRO  
**Date:** Wednesday, January 25, 2017 3:52:55 PM  
**Attachments:** [ALL STAFF-#1813692-v13-101197 CHIEF RISK OFFICER QUESTIONS 1.DOCX](#)  
[ALL STAFF-#1850936-v1-101197 BANK ORG CHART FROM BANK WEBSITE.PDF](#)  
[ALL STAFF-#1850924-v1-101197 OFFICE OF CHIEF RISK OFFICER ORG CHART PROVIDED BY BANK.PDF](#)

---

Hi Michaela,

Attached please find the questions, and a couple of supporting items mentioned in the questions, for the first of our meetings next week, with the CRO.

First, as we discussed, we do not expect we will be able to cover everything in the one session. Far from it, I should think. So, as we said, we'll look toward follow-on session(s).

Also, I wanted to mention this in advance in case it comes up: For this meeting, and others we'll have, it's important that no one other than the subject, and perhaps any necessary staff from their unit, be included in the session. This means, for example, other bank management or staff. We need to remove the possibility that our conversation could be affected by other relationships. You may well already know this, and please understand, we're certainly not accusing anybody of anything. This is just our general practice, and we sometimes have issues, so I wanted to flag it in advance. If you have any questions or concerns, let's please discuss.

Otherwise, we're looking forward to an interesting discussion.

Thanks,

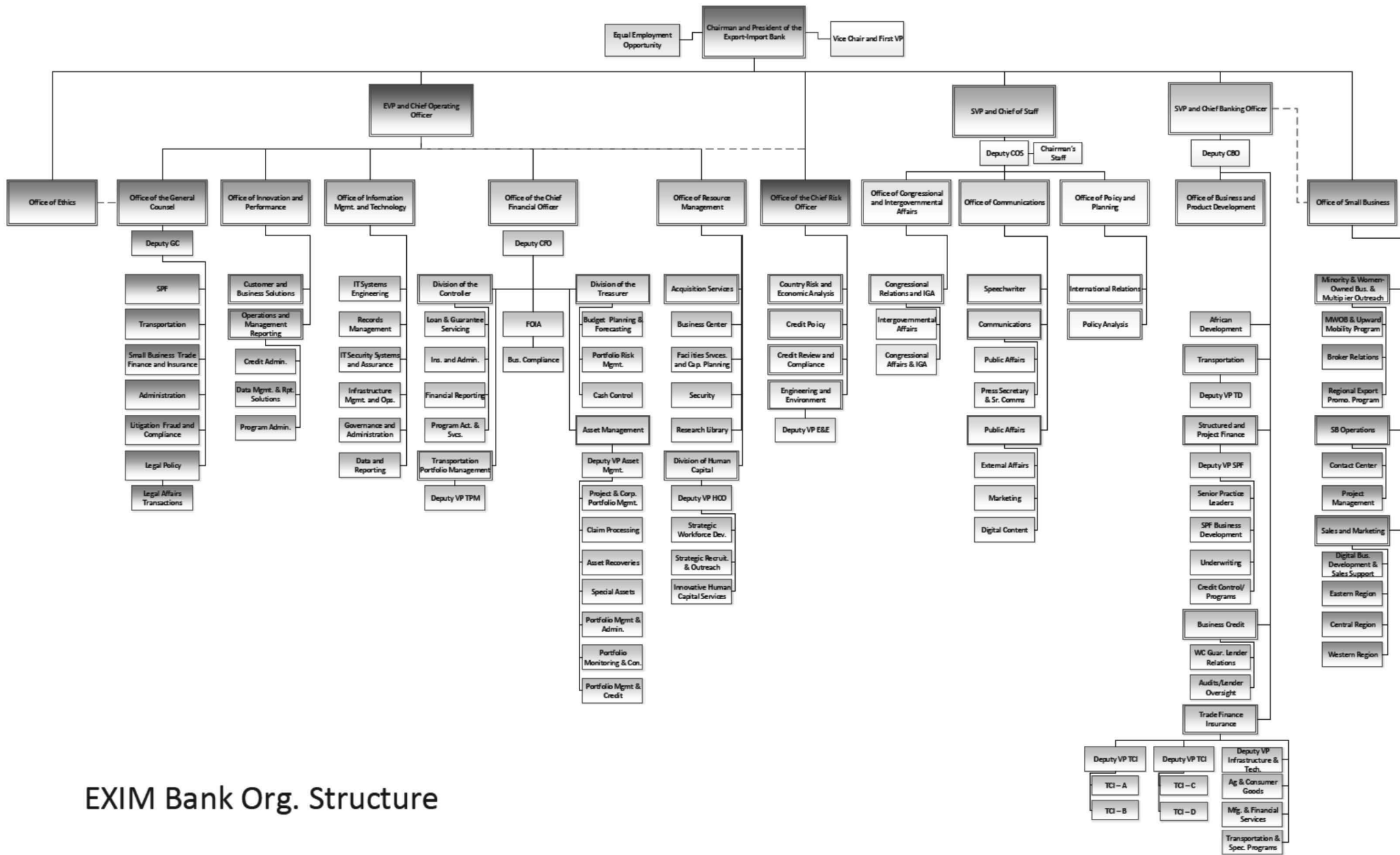
CHS











EXIM Bank Org. Structure

Ken Tinsley Approved  
12.28.16

Office of Risk Management  
Ken Tinsley, SVP, CRO

Country Risk and  
Economic Analysis  
Bill Marsteller, VP

Margaret Miller  
Program Specialist

Ignacio Diaz Jr  
Financial Economist

Robert Klein  
Financial Economist

Nicolas Lizop  
Financial Economist

Manli Zhang  
Financial Economist

Alexander Herman  
Financial Economist

Michael Monderer  
Financial Economist

Credit Policy  
David Carter, VP

Deborah Thompson,  
Director

Duane Lambeth  
Sr. Credit Officer

Steven Dell’Acqua,  
Director

David Dettner  
Sr. Credit Officer

Charles Goohs  
Sr. Credit Officer

Cameron Miller  
Sr. Credit Officer

Credit Review and  
Compliance  
Walter Hill, VP

Ruth Anthony  
Credit Review Officer

Nigussie Haile  
Credit Review Officer

Wendy Robinson  
Credit Review Officer

Juan Velez  
Sr Credit Review Off

Engineering and  
Environment  
Jim Mahoney, VP

Deputy VP E&E  
Karl Kendall

Susan Furr  
Engineering Admin Asst

Mildred Long  
Engineering Mgmt Asst

Technical

Samuel Carnegie  
Sr. Electronics Engineer

Tiffin Caverly  
Sr. Civil Engineer

Ashok Pasricha  
Sr. Technical Advisor

Michael Sams  
Sr. Electrical Engineer

John Craynon  
Sr. Mining Engineer

Roger Yerger  
Mechanical Engineer

Sair Sayed  
Mechanical Engineer

Environmental

Masud Hasan  
Sr. Environmental Eng’r

Catherine Miceli  
Environmental Eng’r

Stephen Parsons  
Sr. Environmental Spec

**From:** [Schmitt, Christopher H](#)  
**To:** [Michaela Smith](#)  
**Subject:** GAO 101197 -- questions for OGC and CRC meetings  
**Date:** Friday, January 27, 2017 12:42:48 PM  
**Attachments:** [ALL STAFF-#1850936-v1-101197 BANK ORG CHART FROM BANK WEBSITE.PDF](#)  
[ALL STAFF-#1818986-v4-101197 CREDIT REVIEW AND COMPLIANCE QUESTIONS 1.DOCX](#)  
[ALL STAFF-#1813811-v10-101197 OFFICE OF GENERAL COUNSEL QUESTIONS 1.DOCX](#)

---

Hi Michaela,

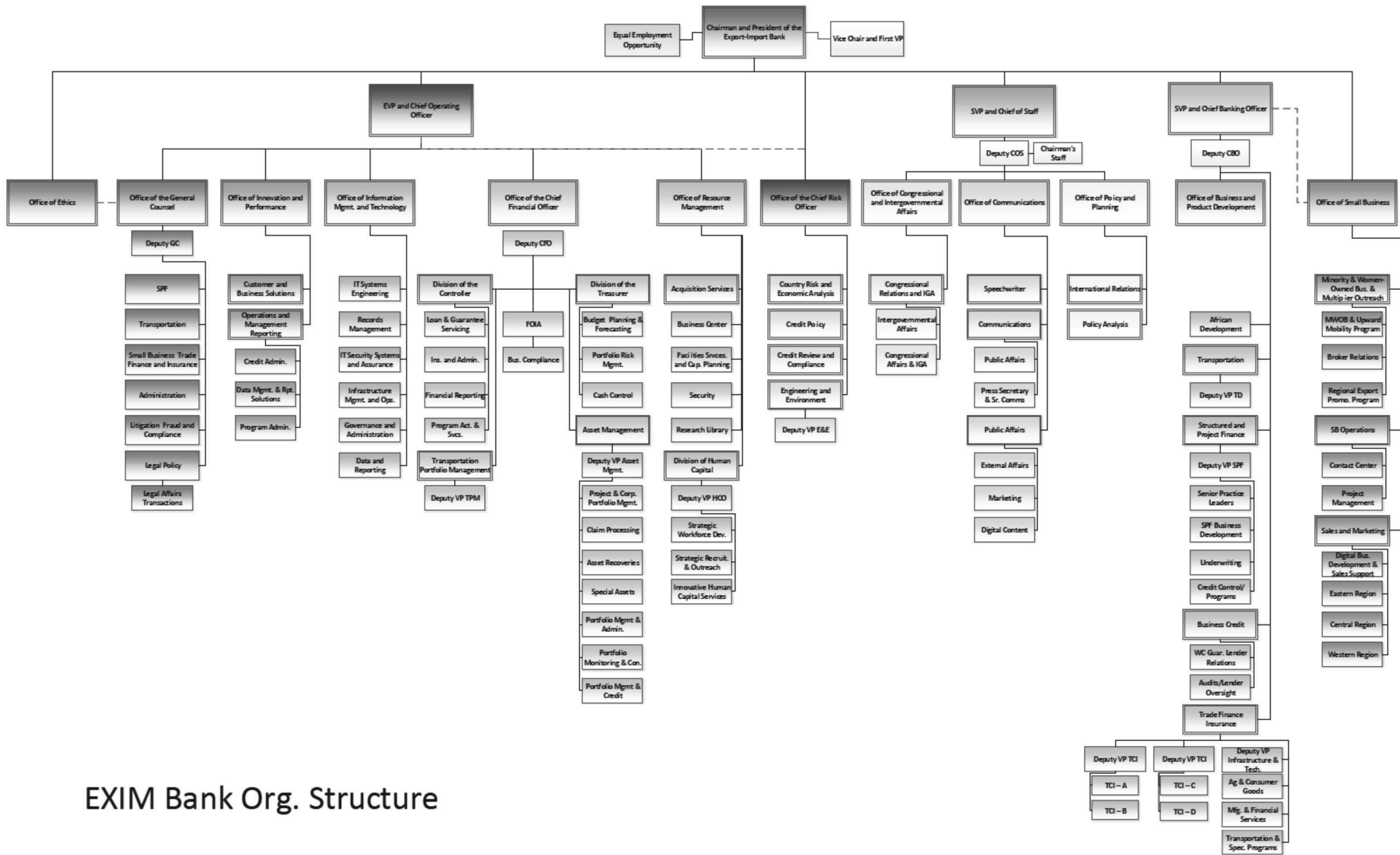
As discussed, here are the questions for the OGC and CRC meetings.

Let me know if you've got any questions on these or the CRO questions sent earlier.

Thanks,

CHS





EXIM Bank Org. Structure

















**From:** Schearf, Paul R  
**To:** Michaela Smith; David M. Sena; Scott Schloegel  
**Cc:** Spencer, Almeta J  
**Subject:** GAO Draft Report to Ex-Im Bank (GAO-17-240) job code 131349  
**Date:** Friday, January 27, 2017 5:20:42 PM  
**Attachments:** Draft report GAO-17-240.pdf

---

January 27, 2017

Mr. Charles J. Hall  
 Acting Chairman and President,  
 Executive Vice President, and  
 Chief Operating Officer  
 Export-Import Bank of the United States

Dear Mr. Acting Chairman and President:

Attached is a copy of our proposed report entitled U.S. Manufacturing: Federal Programs Reported Providing Support and Addressing Trends (GAO-17-240). We are providing this draft for your review and comment before the report is issued. Our work was done under engagement code 131349. Please confirm receipt of this draft report.

We would like to obtain the department's written or oral comments from you or your designated representative by February 27, 2017. These comments will be reflected in the final report. We prefer written comments and request that the written comments be provided electronically. However, we will accept comments provided in hard copy, orally, or in an unsigned e-mail message. During our exit conference we discussed appropriations data for each program in appendix II. The report is now using obligations data, so we would request that the relevant officials confirm or update these numbers if necessary. Please direct all comments and any questions you may have concerning this draft to Mr. Blake Ainsworth, Assistant Director, (202) 512-4609 or [ainsworthb@gao.gov](mailto:ainsworthb@gao.gov), or Mr. Paul Schearf, Analyst-In-Charge <sup>81.6(f)</sup>

This draft has not been fully reviewed within GAO, is subject to change, and must be safeguarded to prevent its improper disclosure. Please do not show or release its contents for any purpose. All drafts remain the property of GAO. Upon request, all electronic copies of drafts must be destroyed and any hard copies of drafts must be returned. We appreciate your cooperation in this matter.

Sincerely yours,

[s]

Andrew Sherrill  
 Director, Education, Workforce  
 And Income Security

Attachment



































































































































































































































































**From:** [Michaela Smith](#)  
**To:** "Schmitt, Christopher H" [81.6\(f\)](#)  
**Subject:** GAO Review of Anti-Fraud Controls: Information Request (#10 List of Fraud Cases)  
**Date:** Thursday, December 29, 2016 3:07:43 PM  
**Attachments:** [ALL STAFF-#1751675-v2-101197 EX-IM BANK PRE-ENTRANCE INFORMATION REQUEST.DOCX](#)

---

Hi Christopher,

Per the email below, the list of internal and external fraud cases (item #10) will be submitted by the OIG.

Thanks,  
Michaela

---

**From:** David Sutkus  
**Sent:** Thursday, December 29, 2016 2:57 PM  
**To:** Michaela Smith  
**Subject:** GAO REVIEW OF ANTI-FRAUD CONTROLS

Michaela,

As requested during our call today, item 10 of the attachment will be provided to the GAO by the OIG. If you have any other questions please don't hesitate to contact me.

Regards,

David Sutkus  
Assistant Inspector General for Investigations  
Office of Inspector General  
Export-Import Bank of the U.S.  
811 Vermont Ave, N.W.  
Washington, DC 20571  
202-565-3921 (O)  
240-688-2570 (C)

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**From:** [Schmitt, Christopher H](#)  
**To:** [Michaela Smith](#)  
**Subject:** Next set of questions  
**Date:** Friday, February 10, 2017 4:55:45 PM  
**Attachments:** [ALL STAFF-#1897701-v4-101197 TRANSPORTATION PORTFOLIO MANAGEMENT DIVISION QUESTIONS .DOCX](#)  
[ALL STAFF-#1897687-v4-101197 ASSET MANAGEMENT DIVISION QUESTIONS.DOCX](#)  
[ALL STAFF-#1897709-v3-101197 CHIEF ETHICS OFFICER QUESTIONS .DOCX](#)

---

Hi Michaela,

As discussed, here's the next set of questions, for 1) the chief ethics officer and 2) the Asset Management and 3) Transportation Portfolio Management divisions.

They're pretty close to final, but I'd like to reserve the right for minor tinkering. In any case, they should serve the purpose of estimating time needed.

Thanks again, and we'll see you on Monday. I see it's the same conference room, so we'll meet you there (assuming no problem with our spiffy new passes – thanks for that.)

Best,

CHS















**From:** [Michaela Smith](#)  
**To:** ["Schmitt, Christopher H"](#)  
**Subject:** RE: EXIM Bank's products  
**Date:** Monday, January 23, 2017 11:35:29 AM  
**Attachments:** [Products and Divisions.xlsx](#)  
[image001.png](#)

---

Hi Chris,

Attached is a list of EXIM Bank's products, which ties to the annual report.

Thanks,  
 Michaela

---

**From:** Schmitt, Christopher H [mailto:[31.6\(f\)](#)]  
**Sent:** Thursday, January 12, 2017 4:58 PM  
**To:** Michaela Smith  
**Subject:** FW: Question re: #11 on information request

Michaela,

Sorry, I forgot to add one item below in my earlier note. It is:

3) Could you provide a comprehensive list of all bank products/services? We know the major categories, of course, and we can see various things described on the website. But we'd like to make sure we get a comprehensive list, if there is one to be had.

Thanks,

CHS

---

**From:** Schmitt, Christopher H  
**Sent:** Thursday, January 12, 2017 3:24 PM  
**To:** 'Michaela Smith'  
**Subject:** RE: Question re: #11 on information request

Hi Michaela,

Thanks for the items you sent earlier.

In response to your question below, we understood that these examinations are on-going...every year (or whatever the specified interval might be), a new batch is done. So, if our understanding is correct, we'd like the latest batch. If our understanding isn't right, however, why don't we say the last three years.

And finally, a couple of other things:

1) We'd like to start the various interviewing we discussed. We'd like to do so with

separate meetings with:

- A. The CRO.
- B. OGC.
- C. Credit Review and Compliance.

If schedules permit, we'd like to suggest doing these from Jan. 30 to Feb. 1. Perhaps we could do two back-to-back on one day, and then the third one another day. Our focus would be higher-level, and we'd supply questions/topics in advance.

2) Could we set up what I think would be a not-long phone call with the data people (I think the names mentioned at our entrance were Stacy Lee or Tyler?) to get more info on how bank data is organized? This would be to inform our eventual data request. (We're also happy to do it in-person, but this one seemed amenable to the phone.)

Thanks,

CHS

---

**From:** Michaela Smith [<mailto:michaela.smith@exim.gov>]

**Sent:** Thursday, January 12, 2017 1:53 PM

**To:** Schmitt, Christopher H

**Subject:** Question re: #11 on information request

Hi Chris:

The request asks for most recently available round of delegated authority lender examinations. Could you please specify the timeframe?

Thanks,  
Michaela

**Michaela Smith** | Internal Controls Officer

Office of the Chief Financial Officer

Export-Import Bank of the United States

811 Vermont Avenue, NW | Washington, DC 20571

Tel 202.565.3426 | Mobile 202.367.6877 | [michaela.smith@exim.gov](mailto:michaela.smith@exim.gov)

[Twitter](#) | [LinkedIn](#) | [YouTube](#)

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**From:** Michaela Smith  
**To:** "Schmitt, Christopher H" [REDACTED]  
**Subject:** RE: GAO 101197 -- Follow-up items from 1/10/17 entrance conference: Responses to 1, 2, 3, 6 (Revised)  
**Date:** Wednesday, February 22, 2017 10:14:43 AM  
**Attachments:** Claim manual 9-20-16-Claims Standalone Manual 2-21-17.docx

---

Hi Chris,

The GGF manual with a cover page.

Thanks.

---

**From:** Michaela Smith  
**Sent:** Tuesday, February 21, 2017 3:18 PM  
**To:** Schmitt, Christopher H [REDACTED]  
**Subject:** FW: GAO 101197 -- Follow-up items from 1/10/17 entrance conference: Responses to 1, 2, 3, 6 (Revised)

Revised to include a response to #2. Remaining responses are forthcoming.

---

**From:** Schmitt, Christopher H [mailto:[REDACTED]]  
**Sent:** Thursday, February 02, 2017 9:08 AM  
**To:** Michaela Smith  
**Subject:** GAO 101197 -- Follow-up items from 1/10/17 entrance conference

Hi Michaela,

Thanks again for setting up this week's meetings. They were very helpful. Meanwhile, I also have the list of follow-up items, as we captured it, from our entrance conference on 1/10 – please see below. I don't think you've provided any of these yet, but please let me know if I've missed anything.

As always, let me know if something isn't clear.

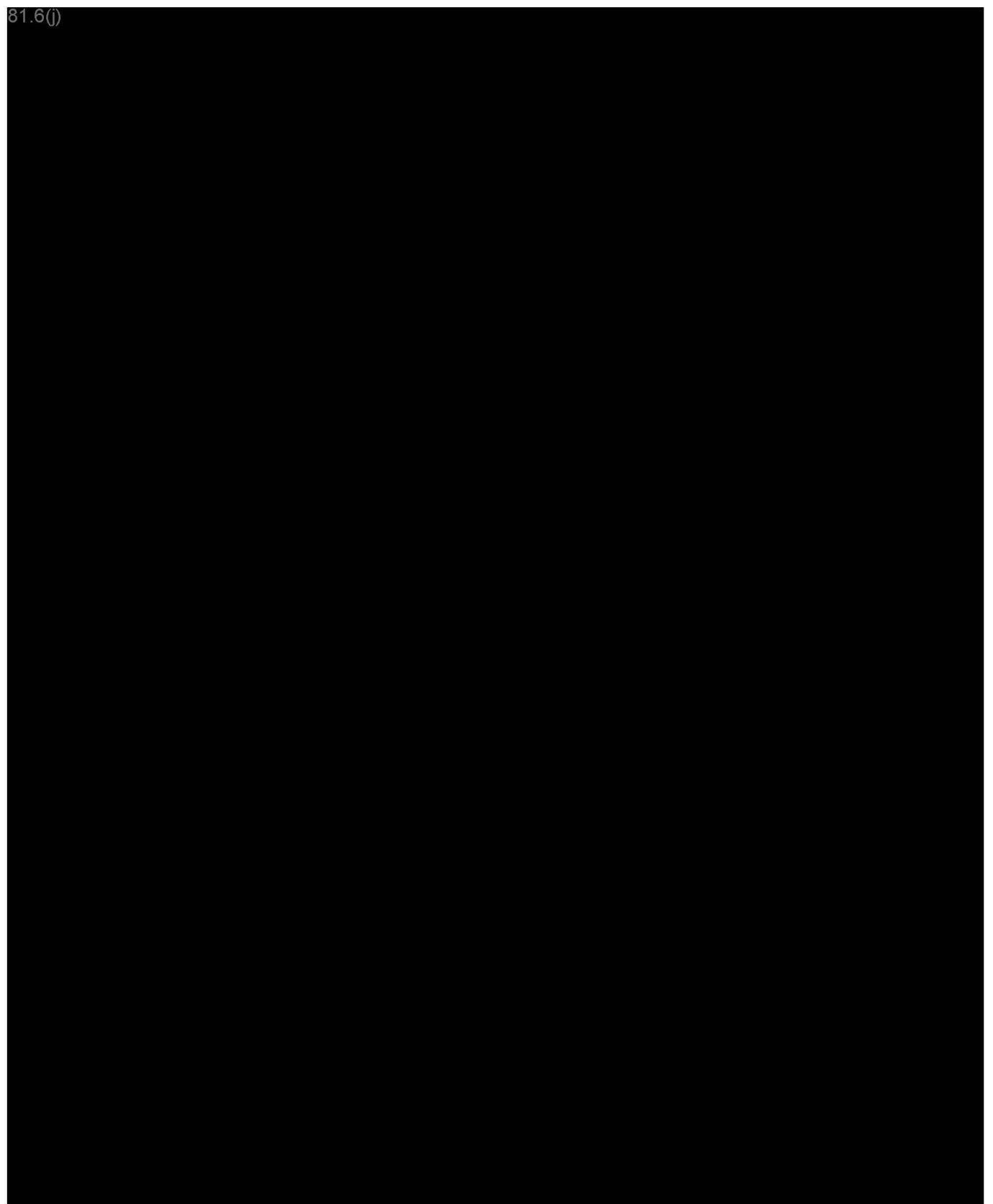
Thanks,

CHS

-----  
Follow-up items

81.6(j)





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**From:** [Schmitt, Christopher H](#)  
**To:** [Michaela Smith](#)  
**Subject:** RE: GAO review of Export-Import Bank anti-fraud controls (101197)  
**Date:** Wednesday, December 21, 2016 9:58:53 AM  
**Attachments:** [image001.png](#)  
[ALL STAFF-#1709724-v3-101197 ENTRANCE CONFERENCE QUESTIONS.DOCX](#)

---

Hi Michaela,

Before the week gets away, and holiday leave hits full swing, I wanted to check back in with you on a few things, if I may.

1. Any word on scheduling of the entrance conference?
2. Any indication of what might be available, and when, from the pre-entrance information request?
3. Attached please find a complete set of entrance conference questions...so, no need for the preliminary topic list we discussed. We might amend slightly depending on any info received on #2 above, but this list should hold up. We did these up for the reason you mentioned – so the right people can be at the meeting.

Please let me know if you need anything else.

Thanks,

CHS

---

**From:** Michaela Smith [<mailto:michaela.smith@exim.gov>]  
**Sent:** Thursday, December 15, 2016 4:53 PM  
**To:** Schmitt, Christopher H  
**Subject:** RE: GAO review of Export-Import Bank anti-fraud controls (101197)

Thanks Chris, will definitely try for January 10<sup>th</sup>.

Michaela

---

**From:** Schmitt, Christopher H [[mailto:31.6\(f\)@exim.gov](mailto:31.6(f)@exim.gov)]  
**Sent:** Thursday, December 15, 2016 4:48 PM  
**To:** Michaela Smith  
**Subject:** RE: GAO review of Export-Import Bank anti-fraud controls (101197)

OK, thanks. When you check with your folks, if you're able to keep that slot of 1/10 at 3:30, that would be very helpful to us. We've already scheduled it with everyone here, based on what I thought was the understanding.

As for the topics, we'll plan on doing that.

Thanks,

Chris

---

**From:** Michaela Smith [<mailto:michaela.smith@exim.gov>]  
**Sent:** Thursday, December 15, 2016 4:33 PM  
**To:** Schmitt, Christopher H  
**Cc:** Martinez, Flavio J  
**Subject:** RE: GAO review of Export-Import Bank anti-fraud controls (101197)

Hi Chris:

1. My apologies for the confusion. January 10<sup>th</sup> has not been set and given the information we received today, we need just a little more time before we can schedule it.
2. It would be great to get a list of general topics, which you can expand upon receipt of available information we provide you. My plan is to meet with staff early next week to see how much information we can provide you prior to the entrance.

Thanks,  
Michaela

---

**From:** Schmitt, Christopher H [[mailto:81.6\(f\)@exim.gov](mailto:81.6(f)@exim.gov)]  
**Sent:** Thursday, December 15, 2016 2:11 PM  
**To:** Michaela Smith  
**Cc:** Martinez, Flavio J  
**Subject:** RE: GAO review of Export-Import Bank anti-fraud controls (101197)

Hi,

Thanks for your note. We appreciate your consideration. A couple of questions, if I may.

1. Re: the entrance conference, which you say you're in the process of scheduling... apologies for any misunderstanding, but we thought we had already set a time and date: 1/10/17 at 3:30 p.m. Is that right, or has the date/time not yet been set?
2. I'm glad you mentioned the idea of information to get the right people at the entrance meeting. That's obviously important to us. We were thinking about the following; please tell me what you might prefer. We'll prepare questions and submit them to you about a week in advance. But those questions might be influenced by the documents we get back from the pre-entrance request I sent earlier today. If getting the question list a week before the meeting is OK for you, insofar as getting the right people to attend, no problem. But would you want a clearer indication before that? The topics in the information request are an indication of where we'll want to go, but there could be a few other areas, too.

Toward that end, we could supply a general topics list at some point before we provide the actual entrance questions, if that helps you zero in on attendees. Please tell me what would work best for you.

Again, if any questions about our work, please let me know.

Thanks,

Chris

---

**From:** Michaela Smith [<mailto:michaela.smith@exim.gov>]  
**Sent:** Thursday, December 15, 2016 1:23 PM  
**To:** Schmitt, Christopher H  
**Cc:** Cristopolis Dieguez; Martinez, Flavio J  
**Subject:** RE: GAO review of Export-Import Bank anti-fraud controls (101197)

Hi Cristopher,

Thank you for following up. I will review your request and let you know if I have any questions. In doing a cursory read, I find this information helpful in making sure that appropriate staff are in attendance of the entrance conference, which I hope to have scheduled today or tomorrow.

In the meantime, if you have questions for me, please feel free to contact me.

Thank you,  
Michaela Smith

**Michaela Smith** | Internal Controls Officer  
Office of the Chief Financial Officer  
Export-Import Bank of the United States  
811 Vermont Avenue, NW | Washington, DC 20571  
Tel 202.565.3426 | Mobile 202.367.6877 | [michaela.smith@exim.gov](mailto:michaela.smith@exim.gov)  
[Twitter](#) | [LinkedIn](#) | [YouTube](#)

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---

**From:** Schmitt, Christopher H [[mailto:31.6\(f\)@exim.gov](mailto:31.6(f)@exim.gov)]  
**Sent:** Thursday, December 15, 2016 12:01 PM  
**To:** Michaela Smith  
**Cc:** Cristopolis Dieguez; Martinez, Flavio J  
**Subject:** GAO review of Export-Import Bank anti-fraud controls (101197)



Dear Michaela,

Greetings, I am the analyst-in-charge for this GAO engagement, for which Cris Dieguez said you would be our lead liaison. I write for a couple of reasons.

First, because the holidays are pushing off normal scheduling of our entrance conference, Cris offered us the opportunity to submit a pre-entrance conference request for information. We appreciate that, and please find the request attached. Hopefully, it is self-explanatory, but please get back to me with any questions/clarifications.

And second, I just wanted to contact you generally as we begin this work. If you'd like to discuss our review or get any information ahead of the entrance conference, we are happy to do that, at your convenience. We look forward to working with you.

Thank you, and best regards,

CHS

---

Christopher H. Schmitt  
Senior analyst  
U.S. Government Accountability Office  
441 G Street NW  
Washington, DC 20548

81.6(f)





**From:** Salinas, Heather L [mailto:81.6(f)]  
**Sent:** Tuesday, August 02, 2016 1:31 PM  
**To:** Goda McEachern  
**Cc:** Cowles, Adam R  
**Subject:** Statement of Facts for GAO Exit Conference with Ex-Im Bank (GAO #100967)

Hello Goda, please see attached the Statement of Facts to discuss during our exit conference. Please also note the disclaimer below. Questions for the Exit to be provided tomorrow.

**Notice: This material is restricted to official use.**

This material is being provided to confirm that the critical facts and key information used to formulate GAO's analyses and findings are current, correct, and complete. This written material is subject to revisions; accordingly, recipients of this material must not, under any circumstances, show or release its contents for purposes other than review from those with responsibility for the subjects it discusses. It must be safeguarded to prevent publication or other improper disclosure of the information it contains. This material and all copies of it remain the property of the Government Accountability Office and must be destroyed or returned on demand.

Best,

Heather L. Salinas  
Senior Analyst, International Affairs and Trade Team  
U.S. Government Accountability Office  
441 G. St, NW  
Washington, D.C. 20548  
81.6(f)















**From:** [Schmitt, Christopher H](#)  
**To:** [Michaela Smith](#)  
**Subject:** Survey meeting and other items  
**Date:** Monday, April 03, 2017 2:37:43 PM  
**Attachments:** [ALL STAFF-#2053410-v4-101197 - GAO SURVEY OVERVIEW WITH EXIM BANK \(3\).docx](#)

---

Hi Michaela,

Greetings, hope things are well. As promised, attached please find questions/discussion topics for our 10 a.m. meeting tomorrow re: the GAO survey. Paulissa and I will be there, and we'll also be joined by David Dornisch, who is a GAO research methodologist.

Meanwhile:

- Thanks for sending those few other things in the last day or so.
- We'll get to you today or tomorrow a similar list of questions/topics for our noon Wednesday meeting re: data. Also, upon reflection, we thought in-person might work best for that, and we're happy to come over. Is that OK? Shall we plan on that?

Thanks,

CHS





From: Salinas, Heather L [mailto:81.6(f)]

Sent: Friday, July 15, 2016 2:09 PM

To: Goda McEachern

Cc: Alley, Ashley G; Cowles, Adam R; Gianopoulos, Kimberly M

Subject: Updated notification letter and list of GAO attendees (GAO 100967)

Hello Goda, thanks again for helping to organize the Entrance Conference on such short notice. As discussed, I'm including an updated notification letter (note that we added a sentence to the first paragraph elaborating on our scope) as well as a list of GAO attendees. Could you please send me the list of all of the Ex-Im attendees?

Kimberly Gianopoulos, Director, (202) 512-8612, Gianopoulousk@gao.gov

Adam Cowles, Assistant Director, (202) 512-9637, Cowlesa@gao.gov

Heather Salinas, Analyst-in-Charge, 81.6(f)

Ashley Alley, Senior Attorney, 81.6(f)

Regards,

Heather L. Salinas

Senior Analyst, International Affairs and Trade Team

U.S. Government Accountability Office

441 G. St, NW

Washington, D.C. 20548

81.6(f)



U.S. GOVERNMENT ACCOUNTABILITY OFFICE

---

441 G St. N.W.  
Washington, DC 20548

July 15, 2016

The Honorable Fred P. Hochberg  
Chairman and President  
Export-Import Bank of the United States

Attention: David Sena  
Chief Financial Officer

Jim Mahoney  
Vice President, Engineering and Environment

Dear Mr. Hochber:

This letter is to inform you of a new U.S. Government Accountability Office engagement on Export-Import Bank Dual-Use Exports—code 100967. Last year, in accordance with 12 U.S.C. § 635(b)(6)(I)(iii), we reported on how Ex-Im complied with its requirements for monitoring the end uses of the dual-use exports it financed in fiscal year 2013 (GAO-15-611). We found that Ex-Im addressed weaknesses in monitoring the end use of exported dual-use items by revising and implementing its guidance for monitoring these items, as GAO recommended in August 2014. As of June 2015, Ex-Im had received all required documents in a timely manner. Our current engagement responds to the requirement for GAO to report on any dual use exports that Ex-Im financed in fiscal year 2014. This includes dual use exports that were authorized in prior fiscal years but continued to be financed in fiscal year 2014. The enclosure provides information on the assignment. If we determine it is necessary to visit locations other than those specified in the enclosure, we will advise you.

We would appreciate your notifying the appropriate officials of this work. The next step will be to set up an entrance conference, which we can hold in person or via teleconference. At that meeting, we will request that your agency identify a point of contact for this engagement, which we believe would be someone in the Engineering Division. Please also invite someone from the Office of Inspector General.

Sincerely yours,

Loren Yager  
Managing Director

International Affairs and Trade  
Enclosure

Engagement subject: Export-Import Bank Financing of Dual-Use Exports

Engagement code: 100967

Source for the work: GAO is beginning this work in response to a congressional mandate

Issue(s) under review/Objective(s)/Key question(s): (1) How is Ex-Im monitoring dual-use exports that it financed in fiscal year 2014, and (2) what dual-use exports, if any, did Ex-Im report it financed in fiscal year 2015?

Agencies to be contacted: Export-Import Bank

Estimated start date for the work: Immediately

Time frame for holding the entrance conference: Mid-July 2016

GAO Team(s) performing the engagement: International Affairs & Trade

GAO contacts:

Kimberly Gianopoulos, Director, (202) 512-8612, Gianopoulousk@gao.gov  
Adam Cowles, Assistant Director, (202) 512-9637, Cowlesa@gao.gov  
Heather Salinas, Analyst-in-Charge, 81.6(f)