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Description of document: Department of Homeland Security (DHS) Office of Inspector General (OIG) Report of Investigation (ROI) re: Alleged Violation(s): 18 USC 208, Acts affecting a personal financial interest, 2011

Requested date: 16-September-2017

Release date: 19-August-2019

Posted date: 02-December-2019

Source of document: Freedom of Information Act Request  
Department of Homeland Security  
OIG Office of Counsel  
245 Murray Lane SW  
Mail Stop - 0305  
Washington, D.C. 20528-0305  
Fax: 202-245-5217  
Email: [FOIA.OIG@OIG.DHS.GOV](mailto:FOIA.OIG@OIG.DHS.GOV)

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

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

August 19, 2019

Subject:     OIG Freedom of Information Act Request No. 2017-IGFO-00148  
              Final Response

This responds to your Freedom of Information Act (FOIA) request to the Department of Homeland Security (DHS) Office of Inspector General (OIG), dated September 16, 2017, seeking “a copy of the report of investigation, final report, closing memo, closing letter, referral letter, referral memo, and other conclusory document from these two investigations: I07-FEMA-TUC-11496 and I07-FEMA-DAL-11496.” Your request was received in this office on September 16, 2017.

In response to your request, a search of the DHS OIG Office of Investigations was conducted. Please be advised that the two investigation numbers in your request pertain to the same investigation. That search resulted in the enclosed records responsive to your request. We reviewed the responsive records under the FOIA to determine whether they may be disclosed to you. Based on that review, this office is providing the following:

  2   page(s) are released in full (RIF);  
 21  page(s) are released in part (RIP).

The exemptions cited for withholding records or portions of records are marked below.

Freedom of Information Act, 5 U.S.C. § 552			Privacy Act, 5 U.S.C. § 552a
<input type="checkbox"/> 552(b)(1)	<input type="checkbox"/> 552(b)(5)	<input checked="" type="checkbox"/> 552(b)(7)(C)	<input type="checkbox"/> 552a(j)(2)
<input type="checkbox"/> 552(b)(2)	<input checked="" type="checkbox"/> 552(b)(6)	<input type="checkbox"/> 552(b)(7)(D)	<input type="checkbox"/> 552a(k)(2)
<input type="checkbox"/> 552(b)(3)	<input type="checkbox"/> 552(b)(7)(A)	<input type="checkbox"/> 552(b)(7)(E)	<input type="checkbox"/> 552a(k)(5)
<input type="checkbox"/> 552(b)(4)	<input type="checkbox"/> 552(b)(7)(B)	<input type="checkbox"/> 552(b)(7)(F)	<input type="checkbox"/> Other:



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OIG redacted from the enclosed documents, names and identifying information of third parties to protect the identities of these individuals. Absent a Privacy Act waiver, the release of such information concerning the third parties named in these records would result in an unwarranted invasion of personal privacy in violation of the Privacy Act. Information is also protected from disclosure pursuant to Exemptions 6 and 7(C) of the FOIA further discussed below.

### **Exemption 6, 5 U.S.C. § 552(b)(6)**

Exemption 6 allows withholding of “personnel and medical files and *similar files* the disclosure of which would constitute a clearly unwarranted invasion of personal privacy.” 5 U.S.C. § 552(b)(6)(emphasis added). DHS-OIG is invoking Exemption 6 to protect the names of third parties and any information that could reasonably be expected to identify such individuals.

### **Exemption 7(C), 5 U.S.C. § 552(b)(7)(C)**

Exemption 7(C) protects from public disclosure “records or information compiled for law enforcement purposes . . . [if disclosure] could reasonably be expected to cause an unwarranted invasion of personal privacy.” 5 U.S.C. § 552(b)(7)(C). DHS-OIG is invoking Exemption 7(C) to protect the identities of third parties, and any information contained in these investigative records that could reasonably be expected to identify those individuals.

### **Appeal**

You have the right to appeal this response.<sup>1</sup> Your appeal must be in writing and received within 90 days after the date of this response. Please address any appeal to:

FOIA/PA Appeals Unit  
DHS-OIG Office of Counsel  
Stop 0305  
245 Murray Lane, SW  
Washington, DC 20528-0305

Both the envelope and letter of appeal must be clearly marked “Freedom of Information Act/Privacy Act Appeal.” Your appeal letter must also clearly

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<sup>1</sup> For your information, Congress excluded three discrete categories of law enforcement and national security records from the requirements of the FOIA. 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 our requesters and should not be taken as an indication that excluded records do, or do not, exist.



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identify the DHS-OIG's response. Additional information on submitting an appeal is set forth in the DHS regulations at 6 C.F.R. § 5.8.

### **Assistance and Dispute Resolution Services**

Should you need assistance with your request, you may contact DHS-OIG's FOIA Public Liaison. You may also seek dispute resolution services from our FOIA Public Liaison. You may contact DHS-OIG's FOIA Public Liaison in any of the following ways:

FOIA Public Liaison  
DHS-OIG Counsel  
STOP 0305  
245 Murray Lane, SW  
Washington, DC 20528-0305  
Phone: 202-981-6100  
Fax: 202-245-5217  
E-mail: [foia.oig@oig.dhs.gov](mailto:foia.oig@oig.dhs.gov)

Additionally, the 2007 FOIA amendments created the Office of Government Information Services (OGIS) to offer mediation services to resolve disputes between FOIA requesters and federal agencies as a non-exclusive alternative to litigation. If you are requesting access to your own records (which is considered a Privacy Act request), you should know that OGIS does not have the authority to handle requests made under the Privacy Act of 1974. Using OGIS services does not affect your right to pursue litigation. You may contact OGIS in any of the following ways:

Office of Government Information Services  
National Archives and Records Administration  
8601 Adelphi Road - OGIS  
College Park, MD 20740-6001  
E-mail: [ogis@nara.gov](mailto:ogis@nara.gov)  
Web: <https://ogis.archives.gov>  
Telephone: 202-741-5770  
Fax: 202-741-5769  
Toll-free: 1-877-684-6448

If you have any questions about this response, please contact us at 202-981-6100.





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Department of Homeland Security

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

Sincerely,

*Drew Lavine*

Drew Lavine  
OIG Office of Counsel

Office of Inspector General  
Office of Investigations

U.S. Department of Homeland Security  
Washington, DC 20528



Homeland  
Security

MAR 16 2011

MEMORANDUM FOR: Brad J. Kieserman  
FEMA, Office of Chief Counsel  
[REDACTED]

FROM: *for* Thomas M. Frost  
Assistant Inspector General for Investigations

SUBJECT: Daniel A. Craig  
(Former) Director, Recovery Division ES-00  
Federal Emergency Management Agency  
Washington, DC

CASE NUMBER: I07-FEMA-DAL-11496

Attached is our Report of Investigation (ROI) on the above subject.

The ROI is furnished to you to evaluate and make an administrative decision regarding the above listed subject. Should you take any administrative action in response to our ROI, please inform this office so we can update our records. Please destroy the ROI upon disposition of this matter.

Should you have any questions regarding the contents of the ROI or need additional information, you may contact me at (202) 254-[REDACTED] or a member of your staff may call G. Michael Wilson, Special Agent in Charge, Disaster Oversight and Operations Division.

Attachment

**DEPARTMENT OF HOMELAND SECURITY  
OFFICE OF INSPECTOR GENERAL**

**REPORT OF INVESTIGATION**

**I07-FEMA-DAL-11496**



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**Homeland  
Security**

# REPORT OF INVESTIGATION

<b>Case Number:</b>	I07-FEMA-DAL-11496
<b>Case Title:</b>	Daniel A. Craig (Former) Director, Recovery Division ES-00 Federal Emergency Management Agency Washington, DC
<b>Report Status:</b>	Final
<b>Alleged Violation(s):</b>	18 USC 208, Acts affecting a personal financial interest.

## SYNOPSIS

Investigation was initiated at the request of the U.S. Attorney's Office (USAO) for the Eastern District of Louisiana and Special Agent [REDACTED], Federal Bureau of Investigation (FBI), New Orleans. Specifically, they requested that the U.S. Department of Homeland Security (DHS), Office of Inspector General (OIG), Office of Investigations (INV) conduct additional fieldwork relative to an INV investigation of allegations involving Daniel A. Craig, (former) Director, Recovery Division, Federal Emergency Management Agency (FEMA), Emergency Preparedness and Response (EP&R) Directorate [INV case file number I05-FEMA-SID-13339S]. Additional investigation was conducted to determine whether Craig, while a FEMA employee (or appointee), violated 18 USC 208 by negotiating employment with contractors the Shaw Corporation (Shaw), CH2M Hill Corporation, the Bechtel Corporation, and the Fluor Corporation (Fluor) who were subsequently awarded FEMA contracts.

The INV re-opened this investigation, which was conducted jointly with the FBI. This investigation further substantiated the previous findings that insufficient evidence existed to prove that Craig substantially participated in the selection of the Shaw Group for a contract with FEMA in violation of the federal criminal conflict of interest laws.

<b>Reporting Agent</b>		<b>Distribution:</b>	
Name: Paul J. Leonard	Signature: [REDACTED]		
Title: Special Agent in Charge	Date: 3-4-2011	Headquarters	Original
<b>Approving Official</b>		Component(s)	cc
Name: Charles Haas	Signature: [REDACTED]	Other	cc
Title: Special Agent in Charge	Date: 3-4-11		

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## REPORT OF INVESTIGATION

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However, the investigation substantiated that Craig falsified time and attendance records by claiming he was working on official business when he was in fact interviewing with prospective employers. Craig also submitted a fraudulent travel voucher, claiming he was traveling on official business when he diverted his official travel from Denton, Texas and traveled to Baton Rouge, Louisiana to interview for a position with Shaw.

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## REPORT OF INVESTIGATION

### DETAILS

On July 25, 2007, DHS OIG INV agents contacted Special Agent [REDACTED], Federal Bureau of Investigation (FBI), regarding the U.S. Attorney's Office (USAO) for the Eastern District of Louisiana's request that the FBI conduct additional leads relative to a U.S. Department of Homeland Security (DHS), Office of Inspector General (OIG), Office of Investigations (INV) investigation that failed to substantiate allegations that Daniel A. Craig potentially violated 18 USC 208, Acts Affecting a Personal Financial Interest, by negotiating employment with contractors the Shaw Corporation, CH2M Hill Corporation, the Bechtel Corporation, and the Fluor Corporation who were subsequently awarded FEMA contracts. (Exhibit 1)

On August 22, 2007, OIG agents met with [REDACTED] Assistant United States Attorney (AUSA), Eastern District of Louisiana and FBI SA [REDACTED]; and discussed the conduct of additional witness interviews relative to the previous OIG investigation. During this meeting SA [REDACTED] advised that he would open an investigation because the OIG had an open case and that the FBI and OIG could conduct the additional witness interviews jointly. (Exhibit 2)

Craig is the former Director of the Recovery Division, FEMA, Emergency Preparedness and Response Directorate, DHS, Washington, DC. Craig was responsible for planning and executing the federal government's recovery from major disasters. Craig oversaw the FEMA program of individual assistance, which provides grants, emergency housing, tax relief and unemployment assistance for individuals, families and businesses. Craig also oversaw the FEMA public assistance program which provides financial assistance to states, local communities and non-profit groups to restore public systems and facilities. Craig held this position from October 27, 2003, until September 30, 2005.

**Allegation: Dan Craig violated Title 18 USC 208, Acts affecting a personal financial interest by negotiating employment with multiple FEMA contractors while he was a Director at FEMA.**

During this investigation DHS OIG received documents from [REDACTED] the [REDACTED]; [REDACTED] for the Shaw Corporation pursuant to subpoenas, which confirmed that Craig solicited employment from the Shaw Corporation and subsequently was employed by Shaw Corporation subcontractor Akerman Senterfitt after he resigned from FEMA:

- An e-mail authored by Shaw Group employee [REDACTED] dated October 7, 2005. This e-mail was sent to numerous individuals at the Shaw Group but not to Dan Craig. The subject line of the e-mail is "FEMA IA-TAC, Dan Craig as Consultant." The body of the e-mail states the following:

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“All: I would appreciate your input before proceeding. [REDACTED]

[REDACTED] Thanks”

- An e-mail from Craig to [REDACTED] the [REDACTED] of Infrastructure of the Shaw Corporation dated August 8, 2006. Craig wrote: “Since I have been with you guys have you lost a bid for a contract.”
- An e-mail from [REDACTED] Craig’s [REDACTED] at Akerman-Senterfitt, dated June 27, 2006 to Shaw official [REDACTED]. This e-mail contains an attachment which is the signed agreement between Shaw and Akerman-Senterfitt. This agreement was signed by Craig, [REDACTED] and [REDACTED], the [REDACTED] of Akerman Senterfitt’s Washington D.C. Office.
- An e-mail from Craig to [REDACTED] dated October 5, 2006, in which Craig writes: “My one year ban is now up and the cuffs are off.”
- An e-mail from Craig to [REDACTED] dated November 17, 2006, which states: “Just received Shaw’s final payment, thanks”
- A lobbying report for Akerman-Senterfitt which was electronically filed with the U.S. House of Representatives on July 5, 2006 and with the United States Senate on July 5, 2006. The client is listed as the Shaw Group. Craig is listed as the lobbyist on three separate issues as the Director of Recovery for FEMA.
- An e-mail from [REDACTED], Craig’s [REDACTED] Shaw [REDACTED] dated September 1, 2006, which had a letter attached written by Craig contesting his listing on a lobbying report filed by Shaw. The letter states: “I, Daniel Craig was inaccurately listed as lobbying for the Shaw Group on the Shaw Group’s House and Senate lobbying report. The report was incorrectly filed by Akerman Senterfitt staff in Washington, DC. As you know, the report listed me as lobbying FEMA on behalf of Shaw, and I am currently unable to lobby FEMA until the end of my one year ban. Be aware that I have never been asked by Shaw staff to lobby FEMA on Shaw’s or anyone else’s behalf.”

[REDACTED] replied to Craig via e-mail almost immediately and wrote: [REDACTED]

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- An e-mail from [REDACTED] to Craig and [REDACTED] on September 1, 2006, with an attached letter written by [REDACTED]. The letter states: "Dear Mr. Craig: [REDACTED]"

b(4)

- An e-mail from Craig to DHS OIG [REDACTED] [REDACTED] [REDACTED] [REDACTED] dated November 29, 2007, in which Craig writes: "Have you heard anything about a DHS investigation related to me about a conflict of interest on shaw two years ago." [REDACTED] replied the following day to Craig via e-mail with "Nope." (Exhibit 3)

### Dan Craig's Employment with Shaw Subcontractor Akerman Senterfitt

DHS OIG utilized a website called opensecrets.org, which is sponsored by the Center for Responsive Politics. A review of this website determined that it maintains records of matters lobbied before the United States House of Representatives and the United States Senate. Utilizing the search function on this website the writer was able to determine that Dan Craig is currently employed by Akerman Senterfitt as a lobbyist/consultant. A query of clients for whom Craig has lobbied lists the Shaw Corporation. A query of the website search function for the Shaw Group listed Akerman Senterfitt as being a lobbying firm the Shaw Corporation hired and paid \$100,000 beginning in 2006. Craig left FEMA September 30, 2005, and began working at Akerman Senterfitt in October 2005. There are no records of Akerman Senterfitt being hired as a lobbyist for the Shaw Corporation prior to 2006. DHS OIG retrieved copies of three lobbying reports were filed in accordance with the Lobbying Disclosure Act of 1995. All three of these lobbying reports document that registered lobbying firm Akerman Senterfitt lobbied on behalf of the Shaw Corporation. One of these lobbying reports, dated October 27, 2006, documents that Craig, listed on the form as the FEMA Director of Recovery acted officially as a lobbyist. (Exhibit 4)

On July 17, 2008, DHS OIG completed a review of the materials obtained from Akerman Senterfitt in response to a DHS OIG subpoena. The following documents were found to have significance:

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A copy of an account statement submitted by Akerman Senterfitt to the Shaw Corporation dated January 9, 2006, with the heading: "RE: Federal Representation Dan Craig Matter #179723 Matter Number 0179723 FEMA and Government Affairs Consulting Client Number 041644 The Shaw Group Inc." Under the cost details section there is an entry that Dan Craig claimed on December 29, 2005, he had a dinner meeting with DHS OIG [REDACTED] in Washington, D.C.

A copy of an account statement submitted by Akerman Senterfitt to the Shaw Corporation (Shaw) dated September 5, 2006, with the heading: "RE: Federal Representation Dan Craig Matter #179723 Matter Number 0179723 FEMA and Government Affairs Consulting Client Number 041644 The Shaw Group Inc." Under the cost details section there is an entry that Dan Craig claimed on August 17, 2006, he met with FEMA [REDACTED]. This meeting occurred approximately 6 weeks before the one-year prohibition Craig was subject to appearing before FEMA.

Copy of an e-mail from Craig to [REDACTED] dated September 19, 2006, in which Craig wrote: "So are you coming to nema, I'm playing golf with the IG on Wednesday and I may have a spot open." [Agent's Note: NEMA is the National Emergency Managers Association, which sponsors an annual conference for government and private sector emergency managers]. (Exhibit 5)

### Interviews of FEMA Employees involved in the awarding of the IATAC contracts

On February 28, 2008, DHS OIG interviewed former FEMA Contracting Officer Technical Representative (COTR) [REDACTED]. [REDACTED] currently works for Immigration & Customs Enforcement (ICE) in Washington, D.C. [REDACTED] was employed by FEMA for 14 years and transferred to ICE in June 2007. [REDACTED] recalled that during the selection of the IATAC contracts in 2005, he was the COTR assigned to the project. [REDACTED] recalled prior to Hurricane Katrina making landfall in August 2005, FEMA had contractor FLUOR as the sole IATAC. Immediately following Katrina's landfall, [REDACTED] arrived in Louisiana and found out Bechtel, Shaw, and CH2MHill received IATAC contracts as well as Fluor. [REDACTED] said he was not aware of the procedure FEMA Acquisition's Division used in order to award the IATAC contracts. [REDACTED] said he had no knowledge of Dan Craig attempting to influence the selection of the contractors for the IATAC contracts. (Exhibit 6)

On March 11, 2008, DHS OIG interviewed [REDACTED] [REDACTED] [REDACTED] for the Office of Acquisition Management, FEMA. [REDACTED] recalled during the selection of the IATAC in 2005, she was granted contracting officer authority to issue contracts and write task orders. [REDACTED] said she could not recall whether she or her first line supervisor, [REDACTED] [REDACTED] awarded the IATAC contracts to the four contractors. [REDACTED] stated she had no personal information regarding Dan Craig attempting to influence the selection of the IATAC contractors. [REDACTED] claimed she could not remember an individual named Dan Craig. [REDACTED] queried the FEMA ProTac computer system in order to determine the Shaw Corporation's contracting history with FEMA. [REDACTED] confirmed the

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IATAC contract, which the Shaw Corporation received, HSFE-HQ-05-D-0573, was the first FEMA contract awarded to the Shaw Corporation. (Exhibit 7)

On March 11, 2008, DHS OIG interviewed [REDACTED] [REDACTED] who worked for FEMA from 1979 to July 2007, when she transferred to her current position as a Procurement Analyst with DHS. [REDACTED] was the contracting officer during the selection of the IATAC contracts. As such, she was responsible for making the contract awards. [REDACTED] stated she saw no improprieties or any involvement by Dan Craig during the selection of the IATAC contractors. [REDACTED] recalled Craig recused himself at some point during the selection process, but she did not elaborate why Craig recused himself. (Exhibit 8)

On March 11, 2008, DHS OIG interviewed [REDACTED], former FEMA Contracting Officer, who stated he was detailed to FEMA Headquarters to provide procurement liaison support between the Recovery Division and the Acquisitions Division in 2005. [REDACTED] worked primarily with [REDACTED] [REDACTED] and [REDACTED] on the procurement documents necessary to support the acquisition of the IATAC contracts. [REDACTED] had been working on the IATAC contracts for months prior to [REDACTED] arrival, and [REDACTED] coordinated the day to day status of the project with [REDACTED]. [REDACTED] said he has no knowledge that Dan Craig influenced the selection of the contractors for the IATAC contracts. (Exhibit 9)

On March 12, 2008, DHS OIG interviewed [REDACTED], former FEMA [REDACTED], regarding the IATAC contract award process. [REDACTED] was employed by FEMA for 25 years, retiring in 2007 as the [REDACTED] and [REDACTED] of FEMA. [REDACTED] held the top procurement position at FEMA for over a decade. In this position, [REDACTED] was responsible for all procurement and acquisitions activities for FEMA. [REDACTED] recalled that, during the selection of the IATAC contracts in 2005, there were four contractors who were in the competitive range and received contracts. [REDACTED] provided this information from recollection as she did not maintain written notes from her career at FEMA. During the selection process, [REDACTED] had a conversation with Craig during which he recommended awarding the IATAC to two contractors not the four being considered. [REDACTED] stated she could not remember which two contractors Craig recommended, but she refuted his recommendation and Craig did not "push back" when she told him that four contractors were going to be selected for the IATAC. [REDACTED] stated she would have reported Craig if she was aware he tried to influence the selection of a contractor. (Exhibit 10)

On March 12, 2008, DHS OIG interviewed [REDACTED], former FEMA [REDACTED], at his current employer, James Lee Witt & Associates. [REDACTED] was the [REDACTED] at FEMA, over finance, procurement, and information technology. [REDACTED] said he did not "supervise" Dan Craig due to the fact Craig was a political appointee with whom all he tried to do was "keep him in his lane." [REDACTED] stated he had no knowledge of Craig attempting to influence the selection of

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## REPORT OF INVESTIGATION

FEMA contractors and if Craig had tried to influence the Acquisitions Division, either former [REDACTED] [REDACTED] or former Contracting Officer [REDACTED] [REDACTED] would have reported Craig. (Exhibit 11)

On March 13, 2008, DHS OIG interviewed [REDACTED] FEMA [REDACTED] [REDACTED]. Prior to becoming the [REDACTED] [REDACTED] in 2007, [REDACTED] was the [REDACTED] [REDACTED], serving as [REDACTED] Dan [REDACTED] [REDACTED] said he had no personal information regarding Craig influencing the selection of the IATAC contracts awarded by the FEMA Acquisitions Division in 2005. [REDACTED] stated he did not observe anything unusual such as Craig attempting to obtain information regarding contractors that if leaked would violate the Procurement Integrity Act. [REDACTED] could not recall when Craig recused himself from making decisions regarding the IATAC contracts, but he did recall an occasion when Craig refused to sign a Form 40-1, the FEMA form which obligates funds for a contractor. [REDACTED] recalled that Craig directed [REDACTED] to have Craig's [REDACTED] [REDACTED] sign the form. [REDACTED] recalled this occurred prior to Hurricane Katrina. (Exhibit 12)

On March 13, 2008, DHS OIG interviewed [REDACTED], FEMA [REDACTED] [REDACTED]. [REDACTED] said [REDACTED] was the individual responsible for gathering intelligence to determine which companies they would recommend to the FEMA Acquisitions Division for consideration for the IATAC contracts. [REDACTED] said he was never approached or influenced by Craig regarding the selection of the contractors for the IATAC contracts. (Exhibit 13)

On March 13, 2008, DHS OIG interviewed [REDACTED], FEMA [REDACTED] [REDACTED]. Prior to becoming the [REDACTED] [REDACTED] was assigned to develop the statement of work for the IATAC contracts. While assigned to create the statement of work for the IATAC in 2005, [REDACTED] first line supervisor was [REDACTED] and his second line supervisor was Craig. [REDACTED] recalled in either late July or early August 2005, he asked Craig, among others, for names of contractors who could perform well as a contractor for the IATAC. [REDACTED] said that Craig suggested to him "Have you looked at Shaw?" Craig did not elaborate any further regarding the Shaw Corporation. Craig did not recommend any other contractor nor did they have any other conversations about the IATAC contracts. [REDACTED] could not recall anyone else being present during this conversation. [REDACTED] stated he had no knowledge of Craig attempting to influence the selection of IATAC contractors. Following Craig's suggestion, [REDACTED] researched the Shaw Corporation via Dunn & Bradstreet and they were a viable contractor for the IATAC. [REDACTED] stated he had no personal knowledge of Craig violating the Procurement Integrity Act by releasing information about one contractor to another. (Exhibit 14)

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# REPORT OF INVESTIGATION

On March 13, 2008, DHS OIG interviewed [REDACTED], FEMA [REDACTED]. [REDACTED] said he had no personal information regarding Craig influencing the IATAC contracts that were awarded in 2005, saying, "Craig went to great lengths to separate himself from any links to the IATAC contracts." [REDACTED] recalled Craig recusing himself from involvement with the IATAC contracts and telling FEMA officials that he was seeking outside employment. [REDACTED] said he had no knowledge of Craig violating the Procurement Integrity Act. [REDACTED] stated that although Craig is a close personal friend, he would have reported him if he was aware of any wrongdoing by Craig. [REDACTED] stated that he had no knowledge of Craig traveling to Louisiana, prior to Hurricane Katrina, at the government's expense. (Exhibit 15)

DHS OIG completed a review of all documents received pursuant to a DHS OIG subpoena served on the Fluor Corporation. A review of this material confirmed that Craig had been in contact with Fluor officials regarding employment. (Exhibit 16)

## Interviews of Shaw Officials

On July 24, 2008, DHS OIG and the FBI interviewed Shaw Corporation [REDACTED]. A review of e-mails disclosed [REDACTED] had extensive contact with Dan Craig. Shaw Federal Division [REDACTED], [REDACTED], and [REDACTED] introduced [REDACTED] to Craig. The purpose of the introduction was to assist [REDACTED] with his effort to bolster Shaw's governmental affairs branch. Craig told [REDACTED] he wanted to leave FEMA and work in government affairs. [REDACTED] recalled Shaw interviewed Craig on two occasions in Baton Rouge during early August 2005. [REDACTED] said Shaw paid for one of the trips and Craig said he was in New Orleans on business for the second interview with Shaw. Craig told [REDACTED] he was also interviewing with the Fluor Corporation as well as the Bechtel Corporation. Craig told [REDACTED] he would make the Shaw Corporation "known" in Washington, D.C.

[REDACTED] recalled discussing the subject of Craig recusing himself from FEMA during the first interview. [REDACTED] "felt comfortable" Craig completed the recusal process. During the second interview [REDACTED] Shaw [REDACTED], and [REDACTED] interviewed Craig. During this interview, the topic of conversation was Craig's acceptance of an employment offer from Shaw, which Craig did and then later rescinded. [REDACTED] stated he was not involved in Craig being hired by Ackerman Senterfitt. [REDACTED] admitted he, [REDACTED] and [REDACTED] made the decision for Shaw to hire Ackerman Senterfitt as a lobbying firm. [REDACTED] claimed he was not aware Craig lobbied on behalf of Shaw and that Shaw terminated its contract with Ackerman Senterfitt immediately once it determined Craig documented he lobbied FEMA on behalf of Shaw. Shaw [REDACTED] and [REDACTED] review all of Shaw's lobbyist reports and notified [REDACTED] that Craig had filed a report claiming he lobbied FEMA on behalf of Shaw. [REDACTED] stated he was "concerned about losing his job" after being notified of this violation by [REDACTED] and [REDACTED]. Craig told [REDACTED] he had been under investigation. [REDACTED] said Craig provided information as a consultant for Shaw to receive the second FEMA IATAC contract. [REDACTED] said the second IATAC contract was worth approximately

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\$600 million dollars. (Exhibit 17)

On July 24, 2008, DHS OIG and the FBI interviewed Shaw Corporation [REDACTED]. In early 2005, [REDACTED] and subordinate [REDACTED] utilized James Lee Whitt & Associates to identify Craig as a person at FEMA that Shaw needed to educate regarding Shaw's capability for emergency response capacity. In 2005, [REDACTED] had lunch with Craig while Craig was still employed by FEMA. Craig told [REDACTED] he had notified FEMA management that he was leaving and had begun the recusal process, but did not show [REDACTED] any documents to indicate he had begun the recusal process. [REDACTED] said he was not aware until this interview that Craig was offered a position with Shaw. When presented with e-mail regarding the hiring of Craig dated October 7, 2005, which was sent to [REDACTED] Shaw e-mail address, [REDACTED] stated he could not recall that e-mail specifically or any conversations regarding the hiring of Craig by Shaw.

[REDACTED] said he did not know Craig went to work for Akerman Senterfitt until this interview. [REDACTED] said he had no knowledge how Akerman Senterfitt was employed by Shaw. [REDACTED] said he had no knowledge of a plan to hire Craig at Akerman Senterfitt to work for one year in order to create FEMA contract proposals on behalf of Shaw. [REDACTED] never advised Craig to advocate on behalf of Shaw to FEMA. [REDACTED] stated he was not aware of Craig providing any services to Shaw for FEMA contract proposals. [REDACTED] said he was not aware of Craig acting as a lobbyist for Shaw or of Craig providing any information to Shaw regarding their contract competitors. [REDACTED] acknowledged that in 2006 Shaw was awarded a second FEMA IATAC contract for a three year period. [REDACTED] stated he met with FEMA [REDACTED] on several occasions in order to discuss approximately \$400 million dollars owed to Shaw by FEMA. During these meetings Craig was not discussed. (Exhibit 18)

On August 8, 2008, DHS OIG and SAUSA Amundson interviewed Shaw Corporation [REDACTED]. [REDACTED] is currently a [REDACTED] at Shaw, responsible for all Federal government contracts awarded to Shaw. [REDACTED] described his position with Shaw as "the pursuit of FEMA contracts for Shaw" as being his primary responsibility. [REDACTED] stated his first line supervisor is [REDACTED] of the Shaw Federal Division, [REDACTED]. [REDACTED] first met Craig at a meeting in June or July 2005 that occurred at the Washington, D.C. office of James Lee Witt & Associates. The meeting was a pre-employment interview for Craig with Shaw. Present at this meeting were [REDACTED], [REDACTED] and [REDACTED] of Shaw. [REDACTED] had approached [REDACTED] about employing an individual who had FEMA experience and [REDACTED] arranged the meeting in June/July between Craig and [REDACTED].

[REDACTED] stated his understanding of Craig's status at FEMA prior to their pre-employment meeting was Craig had recused himself formally at FEMA. [REDACTED] was told that, although Craig still worked at FEMA, he "filed his paperwork." [REDACTED] interpreted this information to mean Craig filed an official

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form that was a recusal letter. [REDACTED] understanding was further based upon comments made by Craig during their initial meeting when Craig told [REDACTED] he personally met with an ethics officer and he (Craig) was not involved in the awarding of any FEMA contracts. Craig never showed [REDACTED] documents to substantiate his claim of having recused himself. During the interview of Craig, [REDACTED] determined Craig would be a "fit" for Shaw [REDACTED] office, not [REDACTED] division. As a result of this determination, [REDACTED] referred Craig to [REDACTED] and [REDACTED] who subsequently interviewed Craig in Baton Rouge, Louisiana.

[REDACTED] claimed Craig never promised he could "deliver FEMA business to Shaw." [REDACTED] stated [REDACTED] handled Craig's hiring by Akerman-Senterfitt. Craig was hired by Akerman-Senterfitt as a consultant, specifically to provide Shaw with the ability to write the IATAC-II contract proposal. [REDACTED] acknowledged FEMA awarded Shaw the IATAC-II contract for a three-year period in 2006. [REDACTED] stated he had no personal knowledge of Craig meeting with FEMA officials while he was employed by Akerman-Senterfitt. Craig told [REDACTED] he was subject to a one-year prohibition from meeting with or lobbying any FEMA officials. [REDACTED] said if Craig had broken his one-year prohibition on meeting with FEMA officials he would not necessarily have known, but he "thought he would have heard about it." [REDACTED] said "if anyone in Shaw was to know that Craig was contacting FEMA he ([REDACTED]) would know." (Exhibit 19)

On August 29, 2008, DHS OIG and the FBI interviewed former Shaw [REDACTED] [REDACTED], who stated he left Shaw on good terms in January 2007. [REDACTED] is presently employed by the Sullivan International Group in San Francisco. [REDACTED] said he was contacted by Shaw [REDACTED] prior to agents contacting him but [REDACTED] would not elaborate as to what he and [REDACTED] discussed, [REDACTED] only acknowledged that [REDACTED] contacted him telephonically and informed him that federal agents would be contacting him for an interview. [REDACTED] said while he was employed by Shaw he had no concerns regarding the company's ethics, elaborating that Shaw was very conservative in their business approach and Shaw followed all correct processes and procedures. [REDACTED] stated while with Shaw his primary responsibility was attempting to acquire contracts for Shaw from the Federal Government. Former FEMA employee [REDACTED] introduced [REDACTED] to Craig after [REDACTED] inquired about hiring a FEMA employee for Shaw. [REDACTED] was aware Craig held a senior appointed position with FEMA in the Recovery Division. [REDACTED] stated Craig recused himself from reviewing FEMA contracts and Craig never claimed he would acquire FEMA contracts for Shaw should he be hired. [REDACTED] stated during Shaw's re-bid for the IATAC-II contract in 2006 Craig may have helped Shaw create their proposal. [REDACTED] stated he and [REDACTED] were responsible for Shaw obtaining FEMA contracts, not Craig. (Exhibit 20)

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### Involvement of DHS OIG Officials with Dan Craig

On October 21, 2008, DHS OIG received a copy of golfer registration documentation from [REDACTED] of Transwestern Real Estate. [REDACTED] and [REDACTED], [REDACTED], organize an annual golf tournament named "In the Ruff" which supports the Washington Animal Rescue League. On May 19, 2008, the golf tournament was held at the Manor Country Club in Rockville, Maryland. According to the registration document, DHS OIG [REDACTED] was originally registered to play in the tournament as part of a "foursome" with FEMA [REDACTED], [REDACTED], FEMA employee [REDACTED], and Dan Craig. On the registration document obtained from [REDACTED] name appears with a line through it and the name of [REDACTED] is written next to [REDACTED] name. [REDACTED] stated that he recalled [REDACTED] registered [REDACTED] for the tournament, but that he [REDACTED] did not play and withdrew from the tournament. [REDACTED] provided copies of two credit card receipts for the tournament, which document that [REDACTED] paid \$1,275 dollars for the tournament's registration. (Exhibit 21)

On October 22, 2008, DHS OIG and SAUSA [REDACTED] personally interviewed DHS OIG [REDACTED]. Also present during this interview was SA [REDACTED] [REDACTED] acknowledged he knows Craig, originally meeting him during a golf outing in approximately 1995. [REDACTED] recalled Craig was present when he met with FEMA Director Joe Albaugh in approximately 2003. The purpose for the meeting with Albaugh was following the creation of DHS; [REDACTED] wanted FEMA to know the agency had the support of DHS OIG. [REDACTED] categorized his social contacts with Craig as limited to "a few golf outings and attendance at a cigar smoking event." [REDACTED] said he never had a lunch or dinner with Craig nor had they visited each other's homes on any occasion. [REDACTED] stated Craig would telephonically contact him and he [REDACTED] would never initiate the contact.

[REDACTED] recalled Craig called him at his office one evening at approximately 7:30 p.m. in September 2005. The purpose of this telephone call was for Craig to self-report directly to [REDACTED] that Craig had negotiated employment with a contractor, which is a violation. When asked if Craig said he violated or might have committed a violation, [REDACTED] stated Craig implied he did not violate any rule by saying he did not take a job. [REDACTED] said Craig never asked him for any advice regarding negotiating employment with a contractor. [REDACTED] said his conversation with Craig led him to believe Craig had talked to a FEMA ethics attorney. [REDACTED] said he immediately reported his conversation with Craig to then DHS OIG Assistant Inspector General for Investigations Lisa Redman. At a later date, Redman told [REDACTED] that a DHS OIG investigation was opened by the Special Investigations Division (SID) regarding Craig's self-reporting of a potential violation.

[REDACTED] said he had no involvement with the DHS OIG SID investigation of Craig, he never reviewed the ROI for the case, nor was he briefed on the investigation due to the fact he is only briefed on

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significant cases and the Craig investigation was not deemed "significant." [REDACTED] said he never attempted to influence the outcome of the Craig investigation or any investigation. [REDACTED] stated he believes his call to [REDACTED] initiated the Craig SID investigation. [REDACTED] recalled an e-mail or telephone inquiry from Craig about the status of the SID investigation. [REDACTED] claimed he asked [REDACTED] if he could contact Craig and provide Craig with the status of the SID investigation, specifically that it was closed with no findings. [REDACTED] said he did not recall any individual inquiring about the Craig investigation and added he would have recalled such an inquiry. [REDACTED] said he never discussed the merits of the Craig investigation with anyone, including Craig. [Amundson allowed [REDACTED] to review e-mails he authored to Craig regarding the SID investigation]. (Exhibit 22)

[REDACTED] acknowledged the e-mails shown to him were his and said that when he wrote to Craig there were "no findings" he meant, "the allegation could not be substantiated." Regarding the e-mail [REDACTED] sent from San Francisco in which he provided Craig with his home, cellular, and office telephone number to Craig in August 2006, [REDACTED] said he was "surprised" and although he could not recall the subject of the subsequent telephone conversation which followed the e-mail [REDACTED] stated "It would not have been about the investigation." [REDACTED] said "he may have returned from San Francisco in August 2006 and asked someone in investigations about the status of the Craig SID investigation."

[REDACTED] stated he played golf with Craig on two occasions since August 2006. [REDACTED] played golf with Craig in Maryland and was accompanied by DHS OIG [REDACTED], [REDACTED], DHS [REDACTED], and DHS OIG [REDACTED]. [REDACTED] saw Craig at the National Emergency Management Association (NEMA) annual conference in February 2006. [REDACTED] said he only exchanged greetings with Craig during the conference and they did not discuss anything. [REDACTED] stated he first became aware the Dallas Field Office was investigating Craig in approximately August 2007. [REDACTED] said he avoided playing golf with Craig since he was the subject of an active DHS OIG investigation. [REDACTED] said he "bowed out" of a May 2008 golf tournament because he discovered Craig was involved in it. [REDACTED] stated he never golfed with Craig while he was the subject of an active investigation. [REDACTED] said he never played golf with Craig and FEMA [REDACTED].

[REDACTED] said he had no knowledge of Craig lobbying FEMA after he resigned from FEMA. [REDACTED] said in closing that dealing with Craig makes you feel "oily by association" and that he would have never jeopardized any DHS OIG investigation by discussing its merits. (Exhibit 23)

On October 22, 2008, DHS OIG and SAUSA [REDACTED] personally interviewed DHS [REDACTED] for [REDACTED]. Also present during this interview was [REDACTED].

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SA [REDACTED] [REDACTED] then held a number of positions with FEMA and in October 2005 he was named the [REDACTED] of the FEMA Katrina Oversight Section. [REDACTED] recalled meeting Craig while he worked at FEMA. They maintained a business relationship as well as a social relationship which included drinks after work on occasions. [REDACTED] stated he never discussed post-employment rules with Craig. [REDACTED] said he never discussed the FEMA IATAC contracts with Craig nor did he discuss Shaw issues with Craig. [REDACTED] was aware that Craig left FEMA to work for Akerman Senterfitt, but he said he and Craig never discussed who Craig's clients were. [REDACTED] could not recall having dinner with Craig on December 29, 2005, but upon being shown Craig's Akerman Senterfitt expense report claim for a dinner with [REDACTED] [REDACTED] stated he may have had drinks with Craig but not dinner. (Exhibit 24)

On October 22, 2008, DHS OIG and SAUSA [REDACTED] interviewed [REDACTED], [REDACTED]. Also present during this interview was SA [REDACTED] [REDACTED] recalled the name Dan Craig, but he did not know who Craig was, had never met Craig nor had he communicated with Craig. (Exhibit 25)

On October 22, 2008, DHS OIG and SAUSA [REDACTED] interviewed DHS OIG [REDACTED] [REDACTED]. Also present during this interview was SA [REDACTED] [REDACTED] met Craig at the National Emergency Management Association Conference in the spring of 2006, during which time he may have played golf with Craig. [REDACTED] was aware of the investigation of Craig but he had not discussed the investigation with Craig and Craig did not lobby [REDACTED] or anyone at DHS OIG regarding the investigation. [REDACTED] never provided Craig with any post FEMA employment advice. (Exhibit 26)

On October 23 2008, SAUSA [REDACTED] SA [REDACTED] and SA [REDACTED] interviewed FEMA [REDACTED]. [REDACTED] met Craig after he began working at FEMA in 2001. [REDACTED] said he heard through hearsay Craig negotiated employment with a contractor that was awarded a FEMA contract, while Craig did not recuse himself. Craig told [REDACTED] he declined the employment offer after the contractor was awarded the contract. [REDACTED] has had dinner with Craig on two occasions and breakfast with Craig twice. [REDACTED] has never been to Craig's house or on his boat. The two breakfasts [REDACTED] ate with Craig were initiated by Craig and occurred at the Holiday Inn located below FEMA headquarters.

Upon being shown the business expense document Craig submitted for the dinner he had with [REDACTED] in August 2006 (Exhibit 27), [REDACTED] stated: "I am pissed at Dan due to the fact he billed a dinner between friends as a business expense." [REDACTED] added he paid Craig in cash for his share of the dinner. [REDACTED] stated Craig never lobbied him on behalf of the Shaw Corporation nor did he prod [REDACTED] for information. [REDACTED] said he didn't recall any conversation with Craig about the FEMA IATAC contract, nor did he recall any conversations about business with Craig. [REDACTED]

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elaborated he had no personal knowledge regarding any FEMA contracts and demanded all FEMA contracting "be on the up and up." [REDACTED] stated he was not aware Craig was subject to a one-year prohibition of lobbying to FEMA. When asked if it were possible Craig mentioned Shaw during their August dinner [REDACTED] replied affirmatively it was possible but did not recall it happening. (Exhibit 28)

On December 9, 2008, An Urgent Report was submitted by Supervisory Assistant United States Attorney [REDACTED] to the Attorney General of the United States. The purpose of the Urgent Report was to notify the Attorney General that investigation determined that former FEMA Recovery Division Director Daniel Craig met with FEMA [REDACTED] for a business dinner within one year of leaving his position, in violation of the conflict of interest statutes. (Exhibit 29)

On [REDACTED] 2008, DHS OIG directed a consensually monitored and recorded operation in furtherance of this investigation. SAUSA [REDACTED] SA [REDACTED] Senior Special Agent [REDACTED] [REDACTED] DHS, OIG, Washington, DC, SSA Mike [REDACTED] DHS, OIG, Washington, DC, SA [REDACTED] [REDACTED] DHS, OIG, Washington DC, and SA [REDACTED] met with FEMA [REDACTED]. During this meeting DHS OIG requested that [REDACTED] review and sign DHS INV Form 72 Consent to Intercept, Monitor and Record Communications. [REDACTED] reviewed the form, stated he wanted to cooperate with the investigation and signed the form. (Exhibit 30)

[REDACTED] and Craig had a consensually monitored meeting on [REDACTED] 2008, [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] (Exhibit 31)

On February 19, 2009, SAUSA [REDACTED] SA [REDACTED] and SA [REDACTED] interviewed [REDACTED], former [REDACTED] with Akerman Senterfitt at the USAO, Middle District of Louisiana. Also present at this meeting was [REDACTED]'s attorney, [REDACTED]. [REDACTED] stated she was employed by Akerman Senterfitt as a [REDACTED] and she became a [REDACTED] until June 2007 when she began her employment as a [REDACTED] with the law firm of Fulbright and Jaworski. [REDACTED] said she works with [REDACTED], who is the former attorney of Dan Craig and has assisted [REDACTED] with legal matters pertaining to Craig. At the time of this interview, [REDACTED] said Craig had not been a client of

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██████████ for a considerable period of time.

As a ██████████, ██████████ was responsible for completing, filing, and amending lobbying reports every six months with the Clerk of the House of Representatives and the Secretary of State via e-mail. Upon filing of these reports, registrations, and any required amendments, ██████████ would receive an e-mail receipt which was filed at Akerman Senterfitt. ██████████ estimated that as the only ██████████ at Akerman Senterfitt she filed approximately 50 lobbying reports every 6 months for the eight to ten lobbyists who were employed at Akerman Senterfitt.

██████████ was responsible for filing reports on Craig's behalf once he was employed at Akerman Senterfitt as a lobbyist. ██████████ was aware since Craig held a covered position with FEMA she had to document it on the lobbying reports. Craig "may" have instructed ██████████ to document the lobbying reports. ██████████ could not recall how many reports she filed for Craig. She did recall Craig dealt with disaster recovery issues with FEMA and DHS. ██████████ said the Shaw Group was a client of Craig's. ██████████ said she would meet with each lobbyist and obtain a handwritten list of the Federal agencies the lobbyist was working on behalf of their client. ██████████ said this list was not maintained in any type of computer database at Akerman Senterfitt. ██████████ stated everything documented on the lobbying reports by her was provided to the respective lobbyist. ██████████ and the lobbyist were the only persons at Akerman responsible for reviewing the lobbying reports prior to their submission.

██████████ was allowed to review two lobbying reports she had filed for the Shaw Group. (Exhibit 32) The first registration, dated June 19, 2006, documented ██████████ as the lobbyist, the second registration, dated, June 20, 2006, documented Craig and ██████████ as lobbyists. ██████████ stated the report which only contained Schuman's name was an amendment to the initial report which documented both ██████████ and Craig. ██████████ could not recall whether Craig instructed her to change the report. ██████████ said if Craig instructed her to change the report she would have done so without asking Craig the reason for the change. ██████████ opined Craig may have wanted his name removed because Craig was a covered official, which ██████████ knew was a big issue. Neither Craig nor ██████████ discussed this amendment with ██████████. ██████████ stated that Craig provided her with the information on the original report. Shaw had been a client of Akerman Senterfitt for only a few weeks prior to filing the registration as ██████████ was responsible for completing registration for all new clients after they signed an agreement with Akerman Senterfitt. ██████████ said she was "struck" that Craig's name was not on the amended registration filed on June 20, 2006, due to the fact Craig "brought the client in." Craig instructed ██████████ how to complete the amended lobbying report but she could not recall the specific conversation.

██████████ said she did not know if Craig lobbied FEMA within Craig's one year of leaving FEMA. ██████████ said she did not know ██████████ nor did she have information regarding Craig meeting with ██████████. ██████████ did not have any knowledge or involvement regarding Craig's billing of his client's or expenses. ██████████ said she had a business relationship with Craig. ██████████ said she

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never met anyone with the Shaw Group and she did not have any e-mail exchange or telephone conversations with anyone from Shaw. (Exhibit 33)

This investigation did not develop any evidence that Craig negotiated for employment with either CH2MHill or Bechtel (Exhibit 34).

**Allegation: Dan Craig met with and negotiated employment with multiple FEMA contractors during time periods he was officially on duty.**

On April 3, 2008, DHS OIG received a copy of Dan Craig's official time and attendance records for the period of time from pay period 11- 2005, through pay period 19-2005. The corresponding dates for these pay periods are May 29, 2005, through October 1, 2005. A comparison of the affidavit Craig provided to DHS OIG in September 2005 and his time and attendance records was conducted. According to Craig's statement he met with officials at the Fluor Corporation on June 10, 2005. Craig's T&A for June 10, 2005, documents that he claimed he worked 8 hours that day. Craig admitted he met with Shaw Corporation executives on July 13, 2005, yet his T&A records indicate he worked 8 hours. Craig admitted he met with a Shaw official on July 18, 2005, yet his T&A claims he worked 8 hours. Craig admitted he met with Shaw officials at their Baton Rouge Office on August 4, 2005, yet he claims on his T&A that he worked 8 hours on that date. Craig admitted he traveled to Baton Rouge to meet with the Shaw Corporation on August 25, 2005, yet his T&A records show he claimed he worked 8 hours on that date. (Exhibit 35)

**Allegation: Dan Craig committed travel voucher fraud by claiming he was travel on official business when he traveled to negotiate employment with FEMA contractor Shaw while he was a Director at FEMA.**

On March 12, 2008, DHS OIG interviewed [REDACTED], former FEMA [REDACTED], at his current employer, James Lee Witt & Associates. [REDACTED] was the Chief Operating Officer at FEMA, over finance, procurement, and information technology. [REDACTED] said he did not "supervise" Dan Craig due to the fact Craig was a political appointee with whom all he tried to do was "keep him in his lane." During 2005 [REDACTED] heard a rumor Craig was interacting with the Shaw Corporation for the purpose of obtaining employment. This interaction included a trip Craig took to the Shaw Corporation in Baton Rouge, Louisiana at Shaw's expense in late August 2005, prior to Hurricane Katrina. [REDACTED] said that Craig's interview with Shaw was inappropriate because Craig had not recused himself from FEMA decisions relating to contractors prior to the interview.

[REDACTED] was shown Craig's travel voucher and travel authorization from an official trip for Craig from Washington, DC to Denton, Texas for a presentation at a conference. [REDACTED] acknowledged the

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signature on the authorization was his, but he denied that the signature on the travel voucher for the completed trip was his. [REDACTED] stated he had no knowledge of why Craig would deviate from his authorized travel in Texas to fly to Baton Rouge, Louisiana at government expense on August 4, 2005. [REDACTED] elaborated he never allowed anyone to sign travel vouchers on his behalf and he could never recall giving Craig permission to do so. [REDACTED] said Craig never contacted him about a change in travel plans regarding this trip and FEMA regulations required Craig to amend his travel authorization to reflect his actual trip. The amended travel voucher is the only authorization that should have been submitted with the travel voucher. [REDACTED] added he only signs travel vouchers in blue ink and his forged signature was in black ink. (Exhibit 11)

On October 25, 2007, DHS OIG reviewed Craig's official travel vouchers for the time period of December 31, 2003, to August 23, 2005. The review disclosed one possible connection between Craig and the Shaw Corporation, a contractor that Craig previously self-reported to OIG agents as a FEMA contractor that he sought employment with. Craig submitted a travel voucher, number Dallas TX, for a period of time August 2, 2005 to August 4, 2005. The travel authorization Form 87 for this travel voucher lists the purpose of Craig's travel as being attendance "at the Region VI Response & Recovery Summit on August 2-4, 2005, in Denton, Texas." In addition to the travel purpose box, which was completed by Craig for this travel, was "Speech or Presentation." The travel voucher documents Craig traveled to Dallas on August 2, 2005, then traveled to Baton Rouge, Louisiana on August 4, 2005. Craig departed Baton Rouge and returned to Washington, D.C. via Atlanta on August 4, 2005. The travel authorization submitted with this voucher listed the category of this trip as "Single trip." The travel voucher contains no supporting documentation regarding what official business Craig had in Baton Rouge on August 4, 2005. The total dollar amount of the travel voucher in question was \$1,285.70 with a loss to the government of \$482.43 dollars due to the extra flight to Baton Rouge and a rental car in Louisiana. (Exhibit 36)

On March 8, 2010, Deputy Criminal Chief for the Middle District of Louisiana, [REDACTED] notified DHS OIG that his office was closing their file concerning Dan Craig. [REDACTED] reviewed the investigative findings and concluded that insufficient evidence exists to prove beyond a reasonable doubt that Craig substantially participated in the selection of Shaw Corporation for a contract with FEMA in violation of the federal criminal conflict of interest laws. (Exhibit 37)

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### EXHIBITS

<u>NUMBER</u>	<u>DESCRIPTION</u>
1.	Memorandum of Activity, dated July 27, 2007, Predication.
2.	Memorandum of Activity, dated August 24, 2007, Meeting with AUSA [REDACTED] [REDACTED] Eastern District of Louisiana.
3.	Memorandum of Activity, dated January 23, 2008, Review of Documents Obtained via DHS OIG Subpoena from the Shaw Corporation.
4.	Memorandum of Activity, dated March 18, 2008, Review of Open Secrets.Org Information.
5.	Memorandum of Activity, dated July 22, 2008, Review of Documents Obtained from Akerman Senterfitt.
6.	Memorandum of Activity, dated April 3, 2008, Personal Interview of Former FEMA Contracting Officer [REDACTED]
7.	Memorandum of Activity, dated April 11, 2008, Personal Interview of FEMA [REDACTED]
8.	Memorandum of Activity, dated March 26, 2008, Personal Interview of former FEMA Contracting Officer [REDACTED]
9.	Memorandum of Activity, dated March 31, 2008, Personal Interview of former FEMA Contracting Office [REDACTED]
10.	Memorandum of Activity, dated March 17, 2008, Personal Interview of former FEMA [REDACTED]
11.	Memorandum of Activity, dated March 17, 2008, Personal Interview of Former FEMA [REDACTED].
12.	Memorandum of Activity, dated March 17, 2008, Personal Interview of FEMA [REDACTED].

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13. Memorandum of Activity, dated March 28, 2008, Personal Interview of FEMA [REDACTED]
14. Memorandum of Activity, dated March 17, 2009, Personal Interview of FEMA [REDACTED]
15. Memorandum of Activity, dated March 28, 2008, Personal Interview of FEMA [REDACTED]
16. Memorandum of Activity, dated April 9, 2008, Review of Documents Received from the Fluor Corporation.
17. FBI Form 302, dated July 28, 2008, Personal Interview of [REDACTED]
18. FBI Form 302, dated July 28, 2008, Personal Interview of [REDACTED]
19. Memorandum of Activity, dated August 26, 2008, Personal Interview of [REDACTED]
20. FBI Form 302, dated September 8, 2008, Personal Interview of [REDACTED].
21. Memorandum of Activity, dated October 29, 2008, Review of Golf Tournament Documents.
22. Copies of E-mails exchanged between [REDACTED] and Dan Craig.
23. Memorandum of Activity, dated November 20, 2008, Personal Interview of [REDACTED]
24. FBI Form 302, dated October 27, 2008, Personal Interview of [REDACTED].
25. FBI Form 302, dated October 27, 2008, Personal Interview of [REDACTED]
26. FBI Form 302, dated October 27, 2008, Personal Interview of [REDACTED]
27. Copy of Akerman Senterfitt Expense Report, dated August 31, 2006.
28. Memorandum of Activity, dated November 20, 2008, Personal Interview of [REDACTED]

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- 29 Copy of the Urgent Report, dated December 10, 2008, sent to the Attorney General.
- 30 DHS OIG INV Form 72, dated December 9, 2008, Signed by [REDACTED]
- 31 Memorandum of Activity, dated [REDACTED], 2008, Consensually Monitored Meeting between Craig and [REDACTED]
- 32 Copies of Lobbying Registration Forms filed by [REDACTED] on June 19, 2006, and June 20, 2006.
- 33 FBI Form 302, dated February 20, 2009, Personal Interview of [REDACTED].
- 34 Memorandum of Activity, dated May 9, 2008, Contact with CH2M Hill Corporation.
- 35 Memorandum of Activity, dated April 3, 2008, Review of Craig's Time and Attendance Records.
- 36 Memorandum of Activity, dated October 25, 2007, Review of Craig's Official Travel Vouchers.
- 37 Copy of Declination Letter from Deputy Criminal Chief [REDACTED] dated March 5, 2010.

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