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DEPARTMENT OF JUSTICE | OFFICE OF THE INSPECTOR GENERAL

**REPORT OF INVESTIGATION**

<b>SUBJECT</b> (b)(6); (b)(7)(C) Senior Level (b)(6); (b)(7)(C) (b)(6); (b)(7)(C)		<b>CASE NUMBER</b> 2021-011419
<b>OFFICE CONDUCTING INVESTIGATION</b> Washington Field Office		<b>DOJ COMPONENT</b> Federal Bureau of Investigation
<b>DISTRIBUTION</b> <input checked="" type="checkbox"/> Field Office WFO <input checked="" type="checkbox"/> AIGINV <input checked="" type="checkbox"/> Component FBI <input type="checkbox"/> USA <input type="checkbox"/> Other		<b>STATUS</b> <input type="checkbox"/> OPEN <input type="checkbox"/> OPEN PENDING PROSECUTION <input checked="" type="checkbox"/> CLOSED <b>PREVIOUS REPORT SUBMITTED:</b> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Date of Previous Report:

**SYNOPSIS**

The Department of Justice (DOJ) Office of the Inspector General (OIG) initiated this investigation upon receipt of information from the Federal Bureau of Investigation (FBI), Inspections Division (INSD), alleging that FBI Senior Level (b)(6); (b)(7)(C) was associated with (b)(6); (b)(7)(C) a foreign national and alleged prostitute. (b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C) The complaint further stated (b)(6); (b)(7)(C) communicated with (b)(6); (b)(7)(C) via the "WeChat" app. It was believed that (b)(6); (b)(7)(C) may have paid for and/or received sexual favors at (b)(6); (b)(7)(C) massage parlor or at other massage parlors in the (b)(6); (b)(7)(C) area.

The OIG investigation substantiated the allegation that (b)(6); (b)(7)(C) visited massage parlors in (b)(6); (b)(7)(C) where he received and paid for illicit commercial sexual services in violation of FBI policy regarding Personal Relationships (Policy Directive 0802D), and the Attorney General's Memorandum regarding Prohibition on the Solicitation of Prostitution, dated April 10, 2015.

<b>DATE</b> (b)(6); (b)(7)(C)	<b>SIGNATURE</b> (b)(6); (b)(7)(C)
<b>PREPARED BY SPECIAL AGENT</b> (b)(6); (b)(7)(C)	
<b>DATE</b> Russell W. Cunningham	<b>SIGNATURE</b>  Digitally signed by RUSSELL CUNNINGHAM Date: 2023.09.18 10:36:33 -04'00'
<b>APPROVED BY SPECIAL AGENT IN CHARGE</b> Russell W. Cunningham	

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The OIG investigation also substantiated the allegation that (b)(6); (b)(7)(C) failed to self-report his close and continuing relationship with a foreign national, (b)(6); (b)(7)(C) in violation of FBI policy as set forth in the FBI Self-Reporting Requirements Policy Guide 1037PG, 4.1.2 Foreign Contacts.

The OIG reviewed information previously obtained by the FBI regarding (b)(6); (b)(7)(C) interactions with (b)(6); (b)(7)(C) during (b)(6); (b)(7)(C). A review of the contents of (b)(6); (b)(7)(C) cell phone, (b)(6); (b)(7)(C) discovered a WeChat conversation with someone identified as (b)(6); (b)(7)(C). In (b)(6); (b)(7)(C) contacts, (b)(6); (b)(7)(C) was associated with telephone number (b)(6); (b)(7)(C). The FBI conducted a search of a law enforcement database that identified the subscriber to that telephone number as (b)(6); (b)(7)(C). The FBI conducted a Google search for (b)(6); (b)(7)(C) name that returned results containing photographs of (b)(6); (b)(7)(C) and identifying him as (b)(6); (b)(7)(C) employed by the FBI. The photographs of (b)(6); (b)(7)(C) matched photographs of himself that (b)(6); (b)(7)(C) sent to (b)(6); (b)(7)(C) in the WeChat conversation.

(b)(6); (b)(7)(C) the FBI conducted two voluntary interviews of (b)(6); (b)(7)(C). During the FBI's interviews, (b)(6); (b)(7)(C) identified a photograph of (b)(6); (b)(7)(C) and told the FBI he had met (b)(6); (b)(7)(C) approximately one year prior through a dating website. (b)(6); (b)(7)(C) told the FBI he dated (b)(6); (b)(7)(C) for a short period, going on approximately four dates, but that they were never sexually intimate. (b)(6); (b)(7)(C) told the FBI the last time he had contact with (b)(6); (b)(7)(C) was in approximately (b)(6); (b)(7)(C). While he admitted going to (b)(6); (b)(7)(C) massage parlor on a single occasion, he stated he did not receive sexual services while there. When questioned in his first FBI interview about having received sexual services at other massage parlors, (b)(6); (b)(7)(C) admitted to visiting (b)(6); (b)(7)(C) massage parlors for approximately six years and claimed to have received two "happy endings," which he described as having his penis manipulated by hand until he ejaculated. During his second interview, (b)(6); (b)(7)(C) increased this estimate, stating he had received more than a dozen "happy endings." (b)(6); (b)(7)(C) told the FBI he paid cash for regular (non-sexual) massages and would pay an additional eighty to one hundred dollars for the "happy ending." (b)(6); (b)(7)(C) told the FBI his most recent visit to a massage parlor occurred roughly two weeks prior to his second FBI interview, in approximately (b)(6); (b)(7)(C).

When asked during his second FBI interview why he did not report his relationship with (b)(6); (b)(7)(C) to the FBI, (b)(6); (b)(7)(C) said he did not believe his relationship with (b)(6); (b)(7)(C) was intimate enough to require him to report his contact with a foreign national.

The OIG and the (b)(6); (b)(7)(C) Police Department investigated (b)(6); (b)(7)(C) for violating (b)(6); (b)(7)(C) state laws regarding prostitution. The (b)(6); (b)(7)(C) Attorney's Office declined prosecution of (b)(6); (b)(7)(C). The U.S. Attorney's Office (b)(6); (b)(7)(C) also declined prosecution of (b)(6); (b)(7)(C).

(b)(6); (b)(7)(C) retired from his position at the FBI effective (b)(6); (b)(7)(C).

When later contacted by the OIG following the declination decisions, (b)(6); (b)(7)(C) declined the OIG's request for a voluntary interview. The OIG has the authority to compel testimony from current Department employees upon informing them that their statements will not be used to incriminate them in a criminal proceeding. The OIG does not have the authority to compel or subpoena testimony from former Department employees, including those who retire or resign during the course of an OIG investigation.

The OIG has completed its investigation and is providing this report to the FBI for its review.

Unless otherwise noted, the OIG applies the preponderance of the evidence standard in determining whether DOJ personnel have committed misconduct. The Merit Systems Protection Board applies this same standard when

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reviewing a federal agency's decision to take adverse action against an employee based on such misconduct. See 5 U.S.C. § 7701(c)(1)(B); 5 C.F.R. § 1201.56(b)(1)(ii).

**DETAILS OF INVESTIGATION**

**Predication**

The Department of Justice (DOJ) Office of the Inspector General (OIG) initiated this investigation upon receipt of information from the Federal Bureau of Investigation (FBI), Inspections Division (INSD), alleging that FBI Senior Level [REDACTED] was associated with [REDACTED] a foreign national and alleged prostitute. [REDACTED]

The complaint further stated [REDACTED] communicated with [REDACTED] via the "WeChat" app. It was believed that [REDACTED] may have paid for and/or received sexual favors at [REDACTED] massage parlor or at other massage parlors in the [REDACTED] area.

The OIG investigation substantiated the allegation that [REDACTED] visited massage parlors in [REDACTED] where he received and paid for illicit commercial sexual services in violation of FBI policy regarding Personal Relationships (Policy Directive 0802D), and the Attorney General's Memorandum regarding Prohibition on the Solicitation of Prostitution, dated April 10, 2015.

The OIG investigation also substantiated the allegation that [REDACTED] failed to self-report his close and continuing relationship with a foreign national, [REDACTED] in violation of FBI policy as set forth in the Self-Reporting Requirements Policy Guide 1037PG, Section 4.1.2 Foreign Contacts.

**Investigative Process**

The OIG's investigative efforts consisted of the following:

Interviews of the following DOJ personnel:

- [REDACTED]

Review of the following:

- FBI Predicating Information
- FBI FD-302, Interview of [REDACTED] dated [REDACTED]
- FBI FD-302, Follow-up Interview of [REDACTED], dated [REDACTED]
- [REDACTED] bank records
- Security Clearance Request for Reconsideration from [REDACTED] dated [REDACTED]

**Solicitation of Prostitutes**

The information provided to the OIG alleged that [REDACTED] was associated with [REDACTED] a foreign national [REDACTED] It was believed that [REDACTED]

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(b)(6); (b)(7)(C) may have paid for and/or received sexual favors at (b)(6); (b)(7)(C) massage parlor or other massage parlors in the (b)(6); (b)(7)(C) area.

FBI Policy Directive 0802D, Personal Relationships, states in part, "FBI employees must not engage in personal relationships which negatively affect their ability to conduct their official duties, or which otherwise adversely affect the FBI's mission." Specifically, Section 6.1.3. of the policy directive states, "Employees are prohibited from soliciting, procuring, or accepting commercial sex, regardless of whether the activity is legal or tolerated in a particular jurisdiction (foreign or domestic). See the Attorney General (AG) memorandum to all Department of Justice (DOJ) personnel, 'Prohibition on the Solicitation of Prostitution' (April 10, 2015). Employees who nevertheless engage in this type of activity will be subject to discipline, up to and including dismissal."

As referenced in the FBI Personal Relationships Policy, the Attorney General's Memorandum for all Department Personnel titled "Prohibition on the Solicitation of Prostitution" and dated April 10, 2015, states in part, "The Department of Justice is measured by the conduct of those who work on its behalf. The solicitation of prostitution threatens the core mission of the Department, not simply because it invites extortion, blackmail, and leaks of sensitive or classified information, but also because it undermines the Department's efforts to eradicate the scourge of human trafficking. Regardless of whether prostitution is legal or tolerated in a particular jurisdiction, soliciting prostitutes creates a greater demand for human trafficking victims and a consequent increase in the number of minor and adult persons trafficked into commercial sex slavery...For these reasons, I want to reiterate to all Department personnel, including attorneys and law enforcement officers, that they are prohibited from soliciting, procuring, or accepting commercial sex. This rule applies at all times during an individual's employment, including while off duty or on personal leave, and applies regardless of whether the activity is legal or tolerated in a particular jurisdiction, foreign or domestic...Department employees who violate these prohibitions will be subject to suspension or termination."

The OIG reviewed copies of FBI FD-302s pertaining to two voluntary interviews of (b)(6); (b)(7)(C) conducted (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) dated (b)(6); (b)(7)(C) and (b)(6); (b)(7)(C) respectively. During the first voluntary interview, (b)(6); (b)(7)(C) admitted to visiting (b)(6); (b)(7)(C) massage parlors for approximately six years and stated he had received two "happy endings". (b)(6); (b)(7)(C) stated the female masseuses at the parlors he visited would manually manipulate his penis to the point of ejaculation. (b)(6); (b)(7)(C) described this act as a "happy ending" or a "hand job." During his second voluntary interview, (b)(6); (b)(7)(C) increased his estimate of the number of "happy endings" he had received to over a dozen, with the most recent occurring approximately two weeks prior to the (b)(6); (b)(7)(C) interview. (b)(6); (b)(7)(C) told the FBI he paid cash for the massages and would pay an additional eighty to one hundred dollars for the "happy ending." When asked why he had not disclosed during the first interview the full extent of the sexual services he received at massage parlors, (b)(6); (b)(7)(C) stated that, at the time, he was unsure of where the line of questioning was leading or how it was probative to the investigation. During the second interview, however, (b)(6); (b)(7)(C) stated that he decided to aid in the investigation by identifying other illicit massage businesses that may not have been known to the FBI.

(b)(6); (b)(7)(C) told the FBI his most recent experiences took place at (b)(6); (b)(7)(C). Other locations (b)(6); (b)(7)(C) utilized were located (b)(6); (b)(7)(C). (b)(6); (b)(7)(C) explained to the FBI he would search for places that provided "happy endings" on the website Bedpage.com and on Craigslist. (b)(6); (b)(7)(C) denied ever receiving a "happy ending" outside of (b)(6); (b)(7)(C) on official travel, or during work hours.

During his voluntary FBI interviews, (b)(6); (b)(7)(C) admitted that he was aware that the activities he sought out at massage parlors and the sexual services he received were considered solicitation of prostitution.

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The OIG conducted the investigation with the [redacted] Police Department [redacted]

During the course of the investigation, the OIG and [redacted] obtained [redacted] bank records in an effort to determine whether [redacted] paid for prostitutes using his personal bank account. Review of those bank records did not reveal anything of investigative value.

At the conclusion of the criminal investigation by the OIG and the [redacted] the [redacted] Attorney's Office declined prosecution of [redacted]. The U.S. Attorney's Office for the [redacted] also declined criminal prosecution of [redacted].

[redacted] retired from his position at the FBI effective [redacted]

When later contacted by the OIG following the declination decisions, [redacted] declined the OIG's request for a voluntary interview. The OIG has the authority to compel testimony from current Department employees upon informing them that their statements will not be used to incriminate them in a criminal proceeding. The OIG does not have the authority to compel or subpoena testimony from former Department employees, including those who retire or resign during the course of an OIG investigation.

**OIG's Conclusion**

Based on his admissions to FBI interviewers and the evidence obtained by the FBI and reviewed by the OIG, the OIG concluded that [redacted] solicited prostitutes as alleged, in violation of FBI Policy Directive 0802D, Personal Relationships, and the Attorney General's Memorandum for all Department Personnel titled "Prohibition on the Solicitation of Prostitution," dated April 10, 2015.

**[redacted] Failure to Report Close or Continuing Contact with a Foreign National**

The information provided to the OIG alleged that [redacted] was associated with [redacted] a foreign national [redacted]. It further alleged that [redacted] and [redacted] communicated via the "WeChat" app. It was believed that [redacted] may have paid for and/or received sexual favors at [redacted] message parlor or at other message parlors in the [redacted] area.

The FBI Self-Reporting Requirements Policy Guide, 1037PG, 4.1.2 Foreign Contacts, dated November 8, 2018, states in part, "All FBI personnel must report close or continuous contacts with foreign nationals via FD-981 'Report of Foreign Contact' forms within EPAS within 45 calendar days of the initial contact." The Self-Reporting Requirements Policy Guide defines the following terms relevant to [redacted] and [redacted]: "Close or personal contact [means] involving or having a relationship, a friendship, or an association because of shared personal interests and/or obligations; 'Foreign national' [means] any non-U.S. citizen in the United States or in a foreign country; 'Intimate' [means] a close, personal, loving, or sexual relationship; 'Ongoing or continuing contacts' [means] relationships or associations that have been developed or in progress for more than 30 days or are taking place at the present time and likely to be recurring or continuing in the future; and lastly, 'Relationship' [means] an emotional or close friendship that may or may not involve sexual activity, an ongoing and professional or social association, or the way in which two or more persons or family members are related by birth, adoption, or marriage."

[redacted]

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The OIG reviewed predicated information provided by the FBI regarding (b)(6), (b)(7)(C) interactions with (b)(6). The FBI reviewed the contents of (b)(6) cell phone, (b)(6), (b)(7)(C) and discovered a WeChat conversation with someone identified as (b)(6), (b)(7)(C). In (b)(6) contacts, (b)(6), (b)(7)(C) was associated with telephone number (b)(6), (b)(7)(C). The FBI conducted a search of a law enforcement database that identified the subscriber to that telephone number as (b)(6), (b)(7)(C). The FBI conducted a Google search for (b)(6), (b)(7)(C) name that returned results containing photographs of (b)(6), (b)(7)(C) and identifying him as (b)(6), (b)(7)(C) employed by the FBI. The photographs of (b)(6), (b)(7)(C) located on the internet matched the selfies (b)(6), (b)(7)(C) sent to (b)(6) in the WeChat conversation. The OIG reviewed the FBI's Cellebrite Extraction Report for (b)(6) Apple iPhone 11 Pro Max, dated (b)(6), (b)(7)(C). The extraction report provided numerous WeChat instant messages exchanged between (b)(6) and (b)(6), (b)(7)(C) from (b)(6), (b)(7)(C) until (b)(6), (b)(7)(C) (approximately five months of data retrieved). The following messages are relevant to the nature of (b)(6), (b)(7)(C) relationship with (b)(6), (b)(7)(C) a foreign national:

- (b)(6), (b)(7)(C) from (b)(6), (b)(7)(C) to (b)(6), (b)(7)(C) "Miss you sweetheart."
- (b)(6), (b)(7)(C) from (b)(6), (b)(7)(C) to (b)(6), (b)(7)(C) sends four heart emojis.
- (b)(6), (b)(7)(C), from (b)(6), (b)(7)(C) to (b)(6), (b)(7)(C) "How are you my dear? Comfortable in your new home?"
- (b)(6), (b)(7)(C) from (b)(6), (b)(7)(C) to (b)(6), (b)(7)(C) "Just thinking about you my beautiful friend," with a heart and an unknown emoji.
- (b)(6), (b)(7)(C) from (b)(6), (b)(7)(C) to (b)(6), (b)(7)(C) "Miss you," with an unknown emoji.
- (b)(6), (b)(7)(C) from (b)(6), (b)(7)(C) to (b)(6), (b)(7)(C) sends three lip emojis.
- (b)(6), (b)(7)(C), from (b)(6), (b)(7)(C) to (b)(6), (b)(7)(C) sends three heart emojis.
- (b)(6), (b)(7)(C) from (b)(6), (b)(7)(C) to (b)(6), (b)(7)(C) "I miss you. I'm glad you are ok."
- (b)(6), (b)(7)(C) from (b)(6), (b)(7)(C) to (b)(6), (b)(7)(C) "Come make love for Christmas," with a heart emoji.
- (b)(6), (b)(7)(C) from (b)(6), (b)(7)(C) to (b)(6), (b)(7)(C) "We have seen each other so many times, we should enjoy that intimacy with each other."
- (b)(6), (b)(7)(C) from (b)(6), (b)(7)(C) to (b)(6), (b)(7)(C) "Oh. Miss you," with a heart emoji.
- (b)(6), (b)(7)(C) from (b)(6), (b)(7)(C) to (b)(6), (b)(7)(C) sends (b)(6), (b)(7)(C) a pattern of heart and lip emojis.
- (b)(6), (b)(7)(C) from (b)(6), (b)(7)(C) to (b)(6), (b)(7)(C) sends (b)(6), (b)(7)(C) three heart emojis.
- (b)(6), (b)(7)(C) from (b)(6), (b)(7)(C) to (b)(6), (b)(7)(C) "Miss you (b)(6), (b)(7)(C) with a lip emoji.
- (b)(6), (b)(7)(C), from (b)(6), (b)(7)(C) to (b)(6), (b)(7)(C) "Good morning (b)(6), (b)(7)(C) How are you? I miss you."
- (b)(6), (b)(7)(C) from (b)(6), (b)(7)(C) to (b)(6), (b)(7)(C) "I miss you my friend."

On (b)(6), (b)(7)(C) (b)(6) sends a message to (b)(6), (b)(7)(C) that states, "Yes I have a good boyfriend so," to which (b)(6), (b)(7)(C) responds, "Sorry I lost...Maybe you have a beautiful friend for me?" (b)(6), (b)(7)(C) then sends a photograph of himself via WeChat to (b)(6), (b)(7)(C) and asks her to share with her friend to see if her friend likes the picture of him. (b)(6), (b)(7)(C) then asks if (b)(6), (b)(7)(C) if her friend would be interested in meeting him. The chat further discusses (b)(6), (b)(7)(C) meeting with a woman named (b)(6), (b)(7)(C) who (b)(6), (b)(7)(C) identified as (b)(6), (b)(7)(C) (b)(6), (b)(7)(C) would ultimately go on a date to have coffee with (b)(6), (b)(7)(C).

During the FBI's voluntary interviews with (b)(6), (b)(7)(C) (b)(6), (b)(7)(C) identified a photograph of (b)(6), (b)(7)(C) and told the FBI he knew the person in the photograph as (b)(6), (b)(7)(C) (b)(6), (b)(7)(C) told the FBI he met (b)(6), (b)(7)(C) approximately one year prior to the interviews through a dating website. (b)(6), (b)(7)(C) told the FBI he dated (b)(6), (b)(7)(C) for a short period of time -- a few months -- and they went on approximately four dates together, but claimed they were never sexually intimate. (b)(6), (b)(7)(C) told the FBI all his dates with (b)(6), (b)(7)(C) took place at his residence in (b)(6), (b)(7)(C) and he communicated with (b)(6), (b)(7)(C) through his phone, text, WhatsApp, and WeChat.

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(b)(6), (b)(7)(C) told the FBI that (b)(6), (b)(7)(C) told him she was from (b)(6), (b)(7)(C) and (b)(6), (b)(7)(C) did not ask her immigration status and did not know if she was a U.S. citizen. (b)(6), (b)(7)(C) told the FBI the last time he had contact with (b)(6), (b)(7)(C) was approximately two to three months prior to the interview, in (b)(6), (b)(7)(C)

(b)(6), (b)(7)(C) also admitted to meeting and going on a date to have coffee with (b)(6), (b)(7)(C) (b)(6), (b)(7)(C) told the FBI he knew (b)(6), (b)(7)(C) but never thought to ask her immigration status. (b)(6), (b)(7)(C) told the FBI (b)(6), (b)(7)(C) worked at (b)(6), (b)(7)(C) massage parlor and he communicated with (b)(6), (b)(7)(C) via WeChat. (b)(6), (b)(7)(C) told the FBI that he did not pursue a relationship or another date with (b)(6), (b)(7)(C) because she did not speak much English and he was not interested in her.

When asked why he did not report his relationship with (b)(6), (b)(7)(C) to the FBI, (b)(6), (b)(7)(C) told the FBI he did not believe his relationship with (b)(6), (b)(7)(C) was intimate enough to require him to file such a report. (b)(6), (b)(7)(C) further told the FBI that since he did not know (b)(6), (b)(7)(C) personal identifiers, he did not complete a report. (b)(6), (b)(7)(C) did not deny knowing that (b)(6), (b)(7)(C) was a foreign national, and did not try to justify or excuse his failure to report his contact with (b)(6), (b)(7)(C) on the basis that did not know, or was uncertain, whether she was a foreign national. When asked why he did not report his contact with (b)(6), (b)(7)(C) to the FBI, (b)(6), (b)(7)(C) told the FBI that he knew (b)(6), (b)(7)(C) was from (b)(6), (b)(7)(C) but never thought to ask her about her immigration status.

The OIG also reviewed a copy of the FBI Report of Foreign Contact, FBI Form FD-981, completed by (b)(6), (b)(7)(C) and dated (b)(6), (b)(7)(C) regarding (b)(6), (b)(7)(C) contact with a third individual, (b)(6), (b)(7)(C) On page one, Counterintelligence Concerns or Suspicious Activity, question two asks, "Is this individual aware of your government involvement, to which (b)(6), (b)(7)(C) responded with, "I notified of my USG employment in order to get copies of her ID for self-reporting and explained that my job requires it before meeting after online dating contact."

(b)(6), (b)(7)(C) retired from his position at the FBI effective (b)(6), (b)(7)(C)

The FBI Security Division revoked (b)(6), (b)(7)(C) security clearance, effective (b)(6), (b)(7)(C) (b)(6), (b)(7)(C) filed a reconsideration of the decision to revoke his security clearance on (b)(6), (b)(7)(C)

When later contacted by the OIG following the declination decisions, (b)(6), (b)(7)(C) declined the OIG's request for a voluntary interview. The OIG has the authority to compel testimony from current Department employees upon informing them that their statements will not be used to incriminate them in a criminal proceeding. The OIG does not have the authority to compel or subpoena testimony from former Department employees, including those who retire or resign during the course of an OIG investigation.

**OIG's Conclusion**

The OIG concluded that (b)(6), (b)(7)(C) engaged in misconduct as alleged and that his failure to report his relationship with (b)(6), (b)(7)(C) a foreign national, as required by FBI policy, constituted administrative misconduct in violation of the FBI Self-Reporting Requirements Policy Guide, 1037PG, Section 4.1.2 Foreign Contacts. (b)(6), (b)(7)(C) met and developed a close relationship with (b)(6), (b)(7)(C) which resulted in (b)(6), (b)(7)(C) having close and continuing contacts with a foreign national, within the meaning of the FBI's reporting policy. (b)(6), (b)(7)(C) told the FBI he met and developed a relationship with (b)(6), (b)(7)(C) for at least one year (in his words), and the OIG reviewed the WeChat messages between (b)(6), (b)(7)(C) and (b)(6), (b)(7)(C) that stretched over months and showed that (b)(6), (b)(7)(C) relationship with (b)(6), (b)(7)(C) was ongoing and continuous, at least close, and possibly intimate.

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The OIG does not give weight to (b)(6); (b)(7)(C) statements to the FBI that he did not ask or inquire as to (b)(6); (b)(7)(C) immigration status, because (b)(6); (b)(7)(C) did not deny knowing (b)(6); (b)(7)(C) was a foreign national; he simply stated he did not believe his relationship with (b)(6); (b)(7)(C) was "intimate enough" to require him to report his contact with her under the FBI's reporting policy for contacts with foreign nationals. The OIG also finds (b)(6); (b)(7)(C) explanation for his failure to report his contact with (b)(6); (b)(7)(C) to be contradictory to his actions and statements in connection with his more limited contact with (b)(6); (b)(7)(C). As reflected above, (b)(6); (b)(7)(C) reported his contact with (b)(6); (b)(7)(C) to the FBI in (b)(6); (b)(7)(C). In doing so, (b)(6); (b)(7)(C) demonstrated that he knew and understood his reporting obligations with respect to contacts with foreign nationals and did so with regard to a much more fleeting and apparently less intimate contact than the continuing relationship he shared with (b)(6); (b)(7)(C).

The OIG has completed its investigation and is providing this report to the FBI for its review.