

SUBJECT [REDACTED]		CASE NUMBER 2018-011527	b6 Per FBI and OIG b7C Per FBI and OIG
OFFICE CONDUCTING INVESTIGATION Washington Field Office		DOJ COMPONENT Federal Bureau of Investigation	
DISTRIBUTION <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		STATUS <input type="checkbox"/> OPEN <input type="checkbox"/> OPEN PENDING PROSECUTION <input checked="" type="checkbox"/> CLOSED PREVIOUS REPORT SUBMITTED: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Date of Previous Report:	

SYNOPSIS


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The Department of Justice (DOJ) Office of the Inspector General (OIG) initiated this investigation upon the receipt of information from the Federal Bureau of Investigation (FBI), Internal Investigations Section (IIS), alleging that from [REDACTED] solicited and engaged in commercial sex. The information alleged further that, based upon [REDACTED] statement to IIS, [REDACTED] and [REDACTED] also solicited and procured commercial sex during their respective assignments [REDACTED]. Additionally, [REDACTED] alleged that in [REDACTED] provided [REDACTED] with a package containing approximately 100 white pills that [REDACTED] was to deliver to a [REDACTED] Police.

During the course of the investigation, the OIG found indications that [REDACTED] and [REDACTED] may also have failed to report unofficial contacts with foreign nationals.

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Regarding [REDACTED] the OIG investigation substantiated the allegations that [REDACTED] solicited, procured, and accepted commercial sex. The OIG found that [REDACTED] violated the Attorney General Memorandum titled "Prohibition on the Solicitation of Prostitution" ("AG Memo Prohibiting Prostitution"), dated April 10, 2015, and FBI Offense Code 4.6, Indecent/Lascivious Acts, when he admittedly procured commercial sex in [REDACTED] while attending the [REDACTED] and in [REDACTED]. The OIG found further that since [REDACTED] procured or accepted commercial sex [REDACTED]. The OIG concluded that [REDACTED] violated FBI Policy Directive 0796D - Reporting FBI Employee Misconduct, and FBI Offense Code 5.8, Failure to Report - Criminal/Serious, by failing to

DATE [REDACTED]	b6 Per FBI and OIG b7C Per FBI and OIG	SIGNATURE [REDACTED]
PREPARED BY SPECIAL AGENT [REDACTED]		
DATE Russell W. Cunningham		SIGNATURE 
APPROVED BY SPECIAL AGENT IN CHARGE [REDACTED]		Digitally signed by Russell W. Cunningham Date: 2021.10.20 08:29:53 -04'00'

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report his own misconduct and the misconduct of others in connection with the procurement of commercial sex. Additionally, the OIG found that [REDACTED] violated FBI Policy Directive 0535D - Unofficial Contacts and Reporting Requirements, and FBI Offense Code 5.7, Failure to Report - Administrative, by failing to report his intimate contact with the foreign nationals from whom he procured commercial sex.

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In addition, the OIG determined that [REDACTED] violated FBI Offense Code 5.8, Failure to Report - Criminal/Serious, and FBI Policy Directive 0796D - Reporting FBI Employee Misconduct, when he failed to report that [REDACTED] provided him with a package containing approximately 100 white pills that [REDACTED] was to deliver to [REDACTED]

[REDACTED] which occurred in [REDACTED]

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Regarding [REDACTED] the OIG investigation substantiated the allegations that [REDACTED] solicited commercial sex. The OIG found that [REDACTED] violated the AG Memo Prohibiting Prostitution when, [REDACTED] allowed a prostitute to sleep in his hotel room and paid her. [REDACTED] denied such conduct on [REDACTED] during an OIG compelled interview, but the OIG did not credit his testimony for several reasons, including that the analysis of an OIG compelled polygraph examination administered to [REDACTED] on [REDACTED] indicated deception. The OIG further concluded that [REDACTED] violated FBI Offense Code 2.6, Lack of Candor/Lying - Under Oath, by lying about his interactions with a prostitute during his [REDACTED] OIG compelled interview, and violated FBI Offense Code 2.5, Lack of Candor/Lying - No Oath, by lying about his interactions with a prostitute during the [REDACTED] polygraph examination. The OIG concluded that [REDACTED] violated FBI Policy Directive 0796D - Reporting FBI Employee Misconduct, and FBI Offense Code 5.8, Failure to Report - Criminal/Serious, by failing to report his own misconduct in connection with the solicitation of commercial sex.

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In addition, the OIG determined that [REDACTED] violated FBI Offense Code 5.7, Failure to Report - Administrative, and FBI Policy Directive 0535D - Unofficial Contacts and Reporting Requirements, when he failed to report an intimate relationship with a [REDACTED] national whom he met at a bar between [REDACTED] while [REDACTED]. The OIG further found that [REDACTED] violated FBI Offense Code 2.5, Lack of Candor/Lying - No Oath, when he denied engaging in sex acts with foreign nationals and unreported foreign contacts during a [REDACTED] OIG compelled polygraph examination. An analysis of the data indicated deception by [REDACTED] in response to the polygraph questions concerning engaging in sex acts with foreign nationals and unreported foreign contacts.

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Regarding [REDACTED] the OIG investigation substantiated the allegations that [REDACTED] solicited, procured, and accepted commercial sex. The OIG found that [REDACTED] violated the AG Memo Prohibiting Prostitution and FBI Offense Code 4.6, Indecent/Lascivious Acts, when he engaged in sex acts with and made payments to prostitutes during the [REDACTED] and during the [REDACTED]. [REDACTED] denied such conduct during a [REDACTED] OIG compelled interview, but the OIG did not credit his testimony for several reasons, including that the analysis of an OIG compelled polygraph examination administered to [REDACTED] on [REDACTED] indicated deception. The OIG further found that [REDACTED] violated FBI Offense Code 2.6, Lack of Candor/Lying - Under Oath, when he denied the alleged sex acts with prostitutes during the [REDACTED] OIG compelled interview, and violated FBI Offense Code 2.5, Lack of Candor/Lying - No Oath, when he lied about sex acts with prostitutes during the [REDACTED] compelled polygraph examination. The OIG concluded that [REDACTED] violated FBI Policy Directive 0796D - Reporting FBI Employee Misconduct, and FBI Offense Code 5.8, Failure to Report - Criminal/Serious, by failing to report his own misconduct and the misconduct of others in connection with the procurement of commercial sex. Additionally, the OIG found that [REDACTED] violated FBI Policy Directive 0535D - Unofficial Contacts and Reporting Requirements, and FBI Offense Code 5.7, Failure to Report - Administrative, by failing to report his intimate contact with the foreign nationals from whom he procured commercial sex.

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Regarding [REDACTED] the OIG investigation substantiated the allegations that [REDACTED] solicited, procured, and accepted commercial sex. The OIG determined that [REDACTED] violated FBI Offense Code 4.6, Indecent/Lascivious Acts, when he engaged in sex acts with prostitutes at the [REDACTED] massage parlor [REDACTED] and in the [REDACTED]

company of [REDACTED] in [REDACTED].¹ Although [REDACTED] denied such conduct during a [REDACTED] OIG compelled interview, the OIG did not credit [REDACTED] testimony for several reasons, including that the analysis of an OIG compelled polygraph examination indicated deception by [REDACTED] in response to questions concerning his interactions with prostitutes and the fact that [REDACTED] testified to the OIG that he and [REDACTED] engaged in sex acts with prostitutes in the same room as one another. The OIG further found that [REDACTED] made false statements in violation of 18 U.S.C. § 1001 during the [REDACTED] OIG compelled interview and [REDACTED] compelled polygraph examination, when he denied engaging in sex acts with a prostitute. [REDACTED] denials were directly contradicted by [REDACTED] who had no reason to fabricate to the OIG that he and [REDACTED] engaged in sex acts with prostitutes. In addition, we found that [REDACTED] denials during the compelled interview and compelled polygraph examination violated FBI Offense Code 2.6, Lack of Candor/Lying – Under Oath, and FBI Offense Code 2.5, Lack of Candor/Lying – No Oath, respectively. The OIG concluded that [REDACTED] violated FBI Policy Directive 0796D - Reporting FBI Employee Misconduct, and FBI Offense Code 5.8, Failure to Report – Criminal/Serious, by failing to report his own misconduct and the misconduct of others in connection with the procurement of commercial sex. Additionally, the OIG found that [REDACTED] violated FBI Policy Directive 0535D - Unofficial Contacts and Reporting Requirements, and FBI Offense Code 5.7, Failure to Report – Administrative, by failing to report his intimate contact with the foreign nationals from whom he procured commercial sex.

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The OIG also found that [REDACTED] violated FBI Offense Code 2.6, Lack of Candor/Lying – Under Oath, when, during the [REDACTED] OIG compelled interview, he denied observing or placing pills in a package to be delivered to an individual known as [REDACTED]. The analysis of the data from [REDACTED] OIG compelled polygraph examination indicated deception by [REDACTED] in response to the polygraph questions concerning whether [REDACTED] observed or placed pills in a package to [REDACTED].

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In addition, the OIG determined that [REDACTED] violated FBI Offense Code 5.7, Failure to Report – Administrative, and FBI Policy Directive 0535D - Unofficial Contacts and Reporting Requirements, when he admittedly failed to report that between [REDACTED] he had contact with [REDACTED] female [REDACTED] nationals, including sexual contact with more than half of them. The OIG further found that [REDACTED] violated FBI Offense Code 2.5, Lack of Candor/Lying – No Oath, when, on [REDACTED] denied to the Office of the Security Division (SecD), Analysis and Investigations Unit, FBI, that he had sexual relations with anyone beside two particular women in [REDACTED] or any other countries in the region [REDACTED].

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Regarding [REDACTED] the OIG investigation substantiated the allegations that [REDACTED] solicited, procured, and accepted commercial sex. The OIG found that [REDACTED] violated FBI Offense Code 4.6, Indecent/Lascivious Acts, when he admittedly procured commercial sex between [REDACTED].² Additionally, the OIG determined that [REDACTED] made a false statement in violation of 18 U.S.C. § 1001 and violated FBI Offense Code 2.6, Lack of Candor/Lying – Under Oath, when, on [REDACTED] he denied during his OIG compelled interview that he ever procured a prostitute while on [REDACTED] between [REDACTED] subsequently admitted to engaging in sex acts with prostitutes, following a compelled polygraph examination which indicated deception. The OIG concluded that [REDACTED] violated FBI Policy Directive 0796D - Reporting FBI Employee Misconduct, and FBI Offense Code 5.8, Failure to Report – Criminal/Serious, by failing to report his own misconduct and [REDACTED] misconduct in connection with the procurement of commercial sex. Additionally, the OIG found that [REDACTED] violated FBI Policy Directive 0535D - Unofficial Contacts and Reporting Requirements, and FBI Offense Code 5.7, Failure to Report – Administrative, by failing to report intimate contact with the foreign nationals from whom he procured commercial sex.

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¹ The OIG did not include a finding for violating the AG Memo Prohibiting Prostitution for [REDACTED] because his misconduct occurred prior to April 10, 2015.

² The OIG did not include a finding for violating the AG Memo Prohibiting Prostitution for [REDACTED] because his misconduct occurred prior to April 10, 2015.

Regarding [REDACTED] the OIG investigation substantiated the allegations that [REDACTED] solicited, procured, and accepted commercial sex. The OIG determined that [REDACTED] violated the AG Memo Prohibiting Prostitution when he negotiated sex acts for [REDACTED] at the [REDACTED]. Although [REDACTED] denied such conduct during a [REDACTED] OIG compelled interview, the OIG did not credit [REDACTED] testimony for several reasons, including that the analysis of a [REDACTED] OIG compelled polygraph examination indicated deception by [REDACTED] in response to questions concerning whether he arranged or paid for prostitutes for [REDACTED] at the [REDACTED]. We also found that [REDACTED] violated FBI Offense Code 2.6, Lack of Candor/Lying – Under Oath, when he denied during the [REDACTED] interview that he had negotiated sex acts for [REDACTED] and violated FBI Offense Code 2.5, Lack of Candor/Lying – No Oath, when he lied about negotiating sex acts for [REDACTED] during the [REDACTED] compelled polygraph examination. b6 Per FBI and OIG
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In addition, the OIG found that [REDACTED] violated the AG Memo Prohibiting Prostitution and FBI Offense Code 4.6, Indecent/Lascivious Acts, when he engaged in sex acts with a prostitute [REDACTED]. Although [REDACTED] denied such conduct during a [REDACTED] OIG compelled interview, the OIG did not credit his testimony for several reasons, including that the analysis of an OIG compelled polygraph examination administered to [REDACTED] on [REDACTED] indicated deception in response to questions concerning whether he engaged in sex acts with a prostitute [REDACTED]. The OIG further found that [REDACTED] violated FBI Offense Code 2.6, Lack of Candor/Lying – Under Oath, when he denied during his OIG compelled interview that he had engaged in sex acts with a prostitute at the [REDACTED] and violated FBI Offense Code 2.5, Lack of Candor/Lying – No Oath, when he lied about sex acts with prostitutes during the [REDACTED] compelled polygraph examination. The OIG concluded that [REDACTED] violated FBI Policy Directive 0796D - Reporting FBI Employee Misconduct, and FBI Offense Code 5.8, Failure to Report – Criminal/Serious, by failing to report his own misconduct and the misconduct of others in connection with the procurement of commercial sex. Additionally, the OIG found that [REDACTED] violated FBI Policy Directive 0535D - Unofficial Contacts and Reporting Requirements, and FBI Offense Code 5.7, Failure to Report – Administrative, by failing to report his interactions with the foreign nationals from whom he procured commercial sex. b6 Per FBI and OIG
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The OIG also determined that [REDACTED] violated FBI Offense Code 5.7, Failure to Report – Administrative and FBI Policy Directive 0535D, when he failed to report a financial relationship with a [REDACTED] national that occurred in or [REDACTED] and an intimate relationship with a [REDACTED] national that occurred between [REDACTED] both of which occurred while [REDACTED]. The OIG further found that [REDACTED] violated FBI Offense Code 2.5, Lack of Candor/Lying – No Oath, when, on [REDACTED] denied this conduct during an OIG compelled polygraph examination. An analysis of [REDACTED] responses to the relevant polygraph questions indicated deception by [REDACTED].

[REDACTED]

However, the OIG concluded that [REDACTED] engaged in misconduct in violation of the AG Memo Prohibiting Prostitution and FBI Offense Code 5.23, Violation of Miscellaneous Rules/Regulations, when, as a supervisor, he failed to report suspected violations of the AG Memo Prohibiting Prostitution by [REDACTED] and [REDACTED]. All [REDACTED] present other than [REDACTED] stated that they were given room keys or numbered papers corresponding to hotel rooms while they were sitting together at the karaoke bar. [REDACTED]. Although [REDACTED] told the OIG that he did not know what [REDACTED] or [REDACTED] did in their hotel rooms, [REDACTED] also said that he would never have talked to them about it because of the shame he felt about allegations of prostitution, and he did not raise any concerns when [REDACTED] asked whether everybody had a good time on the ride back to the hotel. Under these facts, the OIG concluded that [REDACTED]. b6 Per FBI and OIG
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suspected or was willfully blind to the likelihood that [REDACTED] and [REDACTED] had violated the AG Memo by accepting commercial sex from the [REDACTED] had a duty to timely report suspected violations of the AG Memo Prohibiting Prostitution to the appropriate FBI official or supervisor. b6 Per FBI and OIG
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[REDACTED]

The Public Integrity Section (PIN) declined to open a criminal investigation on [REDACTED]

[REDACTED]

[REDACTED] resigned from his position at the FBI effective [REDACTED]

[REDACTED] was removed from his position at the FBI effective [REDACTED]

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[REDACTED] resigned from his position at the FBI effective [REDACTED]

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

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

[REDACTED] resigned from his position at the FBI effective [REDACTED]

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

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 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).

ADDITIONAL SUBJECTS

[REDACTED]

Federal Bureau of Investigation

[REDACTED]

Federal Bureau of Investigation

[REDACTED]

Federal Bureau of Investigation

[REDACTED]

Federal Bureau of Investigation

[REDACTED]

Federal Bureau of Investigation

[REDACTED]

Federal Bureau of Investigation

[REDACTED]

Federal Bureau of Investigation

[REDACTED]

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DETAILS OF INVESTIGATION

Predication

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The Department of Justice (DOJ) Office of the Inspector General (OIG) initiated this investigation upon the receipt of information from the Federal Bureau of Investigation (FBI), Internal Investigations Section (IIS), alleging that from

[REDACTED] solicited and engaged in commercial sex. The information alleged further that based upon [REDACTED] statement to IIS, [REDACTED]

[REDACTED] and [REDACTED] also solicited and procured commercial sex during their respective [REDACTED] assignments [REDACTED]

[REDACTED] Additionally, [REDACTED] alleged that in [REDACTED] provided [REDACTED] with a package containing approximately 100 white pills that [REDACTED] was to deliver to a [REDACTED] Police.

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During the course of the investigation, the OIG found indications that [REDACTED] and [REDACTED] may also have failed to report foreign contacts.

Investigative Process

The OIG's investigative efforts consisted of the following:

Compelled interviews of the following FBI personnel:

[REDACTED]

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Compelled Polygraph Examination of the following FBI personnel:

[REDACTED]

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Review of the following:

- All Microsoft Lync Chat logs for [REDACTED]

[REDACTED]

- All [redacted] telephone calls and SMS logs from the FBI-issued cell phone(s) assigned to [redacted] and [redacted] from [redacted]
- All [redacted] telephone calls and SMS logs from the FBI-issued cell phone(s) assigned to [redacted]
- All [redacted] telephone calls and SMS logs content from the FBI-issued Blackberry assigned to [redacted]
- All telephone, email, and messaging content from the FBI-issued cell phone(s) assigned to [redacted]
- All sent, received, deleted, and/or archived electronic messages from [redacted] UNET/FBINET email accounts, including all attachments, from [redacted]
- All sent, received, deleted, and/or archived electronic messages from [redacted] UNET/FBINET email account, including all attachments, from [redacted]
- All sent, received, deleted, and/or archived electronic messages from [redacted] UNET email account, including all attachments, from [redacted]
- All Microsoft Lync Chat logs for [redacted] from [redacted]
- Documentation regarding the procurement of cell phones for [redacted]
- DOJ OIG, Cyber Investigations Office (CIO), Report of Forensic Examination regarding data extraction of 14 FBI-issued cell phones assigned to [redacted]
- Cellebrite extractions for 14 FBI-issued cell phones assigned to [redacted]
- FBI FD-302 for interview of [redacted]
- FBI FD-302 for interview of [redacted]
- FBI FD-302 for interview of [redacted]
- Identity of all FBI personnel registered in [redacted]
- Identity of all FBI TDY personnel to [redacted]
- Identity of all FBI personnel assigned to [redacted]
- Identity of all FBI employee attendees at [redacted]
- Foreign travel reports for all FBI employees to the following countries from [redacted]
- FBI OPR Final Report dated [redacted] regarding [redacted]
- FBI OPR Final Report dated [redacted] regarding [redacted]
- FBI OPR expanded investigation on [redacted] regarding [redacted]
- FBI Self-Reporting Sub-Program Search for [redacted] and [redacted]
- FPD Security Financial Disclosure Forms for [redacted] and [redacted]
- FBI Policy Directives 0535D and 0797D
- DOJ OIG, CIO, Report of Forensic Examination regarding [redacted]
- DOJ OIG, CIO, Report of Forensic Examination regarding follow-up [redacted]
- Digital Forensics Analysis Report, prepared by [redacted]
- DOJ OIG, Investigations Division, Polygraph Branch, Polygraph Reports for [redacted] and [redacted]

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b6 Per FBI and OIG
b7C Per FBI and OIG

b6 Per FBI and OIG
b7C Per FBI and OIG
b7E Per FBI

Applicable Laws and Policies

The AG Memo titled "Prohibition on the Solicitation of Prostitution," dated April 10, 2015 ("the AG Memo Prohibiting Prostitution"), states that all Department personnel, including attorneys and law enforcement officers, are prohibited from soliciting, procuring, or accepting commercial sex at all times, whether on or off-duty or on personal leave, and regardless of whether the activity is legal or tolerated in a particular jurisdiction, foreign or domestic. The AG Memo Prohibiting Prostitution further states that supervisors and managers are subject to discipline for failing to report suspected violations. "Suspected violations by Department employees must be immediately reported to the internal affairs personnel of the relevant component's headquarters.... Allegations determined to be non-frivolous also must be reported to the component's security personnel."

According to 18 U.S.C. § 1001, it is unlawful to, "in any matter within the jurisdiction of the executive . . . branch of the Government of the United States, knowingly and willfully . . . make any materially false, fictitious, or fraudulent statement or representation."

FBI Offense Code 2.5, Lack of Candor/Lying – No Oath, states that an employee is in violation for knowingly providing false information when making a verbal or written statement, not under oath, to a supervisor, another Bureau employee in an authoritative position, or another governmental agency, when the employee is questioned about his conduct or the conduct of another person. "False information" is defined to include false statements, misrepresentations, the failure to be fully forthright, or the concealment or omission of a material fact/information.

FBI Offense Code 2.6, Lack of Candor/Lying – Under Oath, states that an employee is in violation for knowingly providing false information in a verbal or written statement made under oath.

FBI Offense Code 2.11, Obstruction of an Administrative Matter, states that an employee is in violation for taking any action to influence, intimidate, impede or otherwise obstruct an administrative matter.

FBI Offense Code 4.6, Indecent/Lascivious Acts, states that an employee shall not inappropriately act in a manner to appeal to or gratify the sexual desires of the employee, his victim, or both.

FBI Offense Code 5.7, Failure to Report – Administrative, states that an employee is in violation for failing to report to the appropriate FBI official or supervisor, in a timely manner, about an administrative matter which the employee knew, or should have known, was required by FBI or DOJ regulation or policy to be reported.

FBI Offense Code 5.8, Failure to Report – Criminal/Serious, states that an employee is in violation for, among other things, failing to report to the appropriate FBI official or supervisor, in a timely manner, any serious misconduct or criminal conduct committed by another employee of which the employee was aware.

FBI Offense Code 5.23, Violation of Miscellaneous Rules/Regulations, states that an employee is in violation for failing to enforce or comply with an FBI, DOJ, Office of Personnel Management, or other federal administrative or operational guideline or policy not specifically delineated in any Offense Code.

FBI Policy Directive 0535D – Unofficial Contacts and Reporting Requirements, states that all FBI personnel must report unofficial contacts with foreign nationals. FBI personnel must report these contacts through the Enterprise Process Automation System (EPAS) using the FD-981 (Report of Foreign Contact) or FD-1078 (Personnel Self Reporting Requirements) form. This Directive requires FBI employees to report suspicious, unusual, or unexpected contacts involving individuals engaged in or associated with criminal or terrorist activities within 72 hours, and all other unofficial contacts with foreign nationals within five business days. Unofficial contacts are defined as "ongoing, close, personal, intimate, or familial relationships or voluntary associations and friendships." According to

this Directive, unofficial contacts do not typically include "routine commercial transactions for goods or services or unavoidable ad hoc or casual encounters, such as in restaurant or retail shops, during community or sporting events, or through sporadic purchases or contacts via the Internet." In addition, "[c]asual contacts or associations arising from living in a community or while attending a house of religious worship do not normally need to be reported to the FBI."

FBI Policy Directive 0796D – Reporting FBI Employee Misconduct, states that FBI employees are expected to adhere to, and maintain high standards of, professional and ethical conduct in both their professional and private lives. FBI employees are obligated to report misconduct when they: (1) personally witness misconduct, (2) become aware of misconduct committed by another FBI employee and have reason to believe it has not yet been reported, or (3) commit misconduct themselves. An FBI employee who makes a good-faith disclosure of information that may evidence misconduct committed by another FBI employee will not be subjected to any adverse action based on the disclosure.

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Engaging in Commercial Sex During the [REDACTED]

The information provided to the OIG by IIS alleged that, during the [REDACTED] [REDACTED] organized an outing to a bar called [REDACTED] with [REDACTED] [REDACTED] Also present were members of the [REDACTED] police. [REDACTED] stated that at one point during the evening he went to a private room and received oral sex from a prostitute and upon returning to the karaoke room he observed [REDACTED] receiving oral sex from a prostitute. [REDACTED] stated [REDACTED] paid the group's bar bill, the private karaoke room fee, and for his own and [REDACTED] sex acts with prostitutes. [REDACTED] stated that the next morning [REDACTED] told him that the previous night he paid to have a prostitute from [REDACTED] come back to his hotel room, but when the prostitute got to his hotel room, she was too drunk to have sex. According to [REDACTED] stated he still paid the prostitute and let her sleep it off.

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[REDACTED] during [REDACTED] OIG compelled interview, [REDACTED] stated that during the [REDACTED] [REDACTED] he, [REDACTED] along with members of the [REDACTED] police, attended an outing to a karaoke bar named [REDACTED] hosted by [REDACTED] stated that once they were inside [REDACTED] women were brought into the karaoke room where they were located and each of the [REDACTED] picked a woman to sit with him to play dice games and drink. [REDACTED] stated that at one point during the evening, he decided he wanted to go to another room in [REDACTED] and have sex with the woman with whom he had been sitting. [REDACTED] stated that upon informing [REDACTED] of this, [REDACTED] told him that [REDACTED] [REDACTED] clarified his original statement to FBI IIS that "prostitutes" had been brought into the private karaoke room at [REDACTED] He told the OIG that not all the women in the bar were prostitutes and a patron would not know if a woman would have sex with them unless they asked.

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According to [REDACTED] then coordinated with one of the [REDACTED] police officers to negotiate for [REDACTED] to take the woman with whom he was sitting to another room for sex since the woman did not speak English. [REDACTED] stated that the [REDACTED] police officer wanted to take care of him since he was in the company of [REDACTED] The [REDACTED] police officer then informed [REDACTED] the price for sex and oral sex. [REDACTED] did not recall the exact price for sex, except that it was expensive and the price for oral sex was \$70-\$80. [REDACTED] stated that [REDACTED] did not negotiate prices with the woman, but that he was talking to the [REDACTED] police officer who was talking to the woman. The [REDACTED] police officer then showed [REDACTED] a room where he could take the woman for sex. [REDACTED] stated that inside the room, he received oral sex from the woman but that no money was exchanged. [REDACTED] stated that upon returning to the karaoke room he never told [REDACTED] what he did in the

other room with the woman. [redacted] said he then paid [redacted] his portion of the group's bar bill, which included the private karaoke room fee and alcohol. [redacted] also gave [redacted] the \$70-\$80 for the oral sex, which was a separate fee which would not have been listed on the group's bar bill since prostitution is illegal in [redacted]

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[redacted] stated that he witnessed [redacted] receiving oral sex inside [redacted]. However, [redacted] could not recall whether he saw this before or after he went to the private room. [redacted] recalled [redacted] saying something to him later in the evening about having problems. [redacted] stated that he believed the prostitute [redacted]

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b7C Per FBI and OIG

Concerning [redacted] stated that the next morning at breakfast with [redacted] and [redacted] disclosed that the woman sitting next to him at [redacted] had come back to his hotel room and "basically passed out." [redacted] said he let her "sleep it off" and that he paid her even though he did not have sex with her. [redacted] stated that a [redacted] police officer had driven him [redacted] back to their hotel the previous night and that there were no women in the vehicle.

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] during [redacted] OIG compelled interview [redacted] denied telling [redacted] during [redacted] that a prostitute from [redacted] had come back to his hotel room and that he paid the prostitute and let her sleep in his hotel room, even though she was too drunk to have sex. According to [redacted] when [redacted] closed for the evening, a few women from inside [redacted] followed the group outside. [redacted] stated one of these women, whom he did not recognize, got into his vehicle which was driven by a [redacted] police officer. [redacted] told the OIG that [redacted] was in the front seat and that the woman was sitting in the backseat between himself and [redacted] stated that during the car ride back to the hotel, he [redacted] passed out from drinking alcohol and was woken up by the [redacted] police officer upon their arrival at the hotel.

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] stated that upon exiting the vehicle he went directly into the hotel and got on the elevator. When he got off the elevator onto his floor, he realized the woman from the vehicle was walking behind him. [redacted] said he asked the woman, "What are you doing here?" to which she replied, "More party." [redacted] told the woman that there was "no more party" because he was exhausted and wanted to go to sleep. The woman replied, "more party." [redacted] stated he then told the woman "No, no, no," and the woman then asked to use the bathroom. [redacted] stated that he let the woman into his hotel room to use the bathroom. [redacted] told the OIG that she used the bathroom for one to two minutes and then exited his hotel room. [redacted] denied having any sexual contact or making any payment to this woman as alleged by [redacted]. [redacted] told the OIG he would take a polygraph examination pertaining to these events and pass it.

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] told the OIG that he told [redacted] the next morning at breakfast that the woman followed him into the hotel and that she indicated she wanted to party more, but that he was too exhausted. [redacted] stated that he told [redacted] that he let her use the bathroom because "she wanted to use the bathroom and that was it." [redacted] denied that he told [redacted] that he paid her even though they did not have sex and reiterated that he did not pay her or touch her. [redacted] stated he could not recall if [redacted] was at the breakfast table when he told [redacted] this.

Concerning [redacted] allegation that he witnessed [redacted] receiving oral sex on the same night at [redacted] stated that he did not witness [redacted] receiving oral sex at [redacted] stated that [redacted] and [redacted] would not have done that in front of the host nation. [redacted] declared that if he or [redacted] had witnessed [redacted] receiving oral sex, they would have said something to [redacted] added that he did not hear the [redacted] police or [redacted] bargaining for sex on the behalf of [redacted] and that [redacted] did not talk about

b6 Per FBI and OIG
b7C Per FBI and OIG

anything sexual in front of him. [REDACTED] stated that he had "absolutely no idea" that [REDACTED] had gone to another room [REDACTED] to receive oral sex, although it could have happened.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] underwent an OIG compelled polygraph examination. The first series of questions concerned [REDACTED] interaction with prostitutes and whether he made payments for sex acts with prostitutes [REDACTED]. An analysis of the data from this series of questions indicated deception by [REDACTED] in response to the polygraph questions.

b6 Per FBI and OIG
b7C Per FBI and OIG

The second series of questions concerned whether [REDACTED] allowed a prostitute to sleep in his hotel room during the [REDACTED]. During the pre-test, [REDACTED] maintained that he never engaged in or paid for any sex acts with a prostitute after returning to his hotel room from the bar [REDACTED] further maintained that he never allowed any prostitute to stay in his room to "sleep it off" or for any other reason. An analysis of the data from this series of questions indicated deception by [REDACTED] in response to the polygraph questions. [REDACTED] was interviewed after being informed that he was deceptive in his responses to the series of questions presented. During the interview [REDACTED] continued to deny the allegations.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] during [REDACTED] OIG compelled interview [REDACTED] told the OIG that when [REDACTED] closed that evening, a few women from inside the bar followed the group outside [REDACTED] stated that one of these women got into his vehicle which was driven by a [REDACTED] police officer. [REDACTED] told the OIG that [REDACTED] was in the front seat and that the woman was sitting in the backseat between himself and [REDACTED] stated he was not sure if the woman in the car was the woman who had been sitting with [REDACTED] during the night, but that she was not the woman with whom he [REDACTED] had been sitting. [REDACTED] stated if the woman had been someone he recognized from [REDACTED] he would have talked to her during the car ride back to the hotel. Since he did not recognize her, he just slept on the way back to the [REDACTED] Hotel in [REDACTED] did not recall [REDACTED] conversing with the woman and thought it was a quiet ride back to the hotel since they were all "tired and drunk." [REDACTED] said [REDACTED] so, upon arriving at the hotel, he just said "see you guys tomorrow" and "bolted" up to his hotel room. [REDACTED] said when he left [REDACTED] and the woman, they were mingling and conversing. [REDACTED] stated that neither [REDACTED] nor the woman rode on the hotel elevator with him.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] stated that the next morning, he saw [REDACTED] and [REDACTED] at breakfast, but he did not sit with or speak to them as he ate breakfast [REDACTED] stated he never had any conversations with [REDACTED] about the woman that rode with them from [REDACTED] or what happened once they arrived back at the hotel. [REDACTED] added that if [REDACTED] stated he was present at breakfast the next morning when [REDACTED] allegedly told the story about the woman coming to his hotel room, then "he's absolutely lying."

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] denied receiving oral sex from a prostitute at the bar [REDACTED] during the [REDACTED]. [REDACTED] stated he only received a lap dance from a woman at [REDACTED] and did not engage in any sex acts with a woman from the bar. [REDACTED] stated that he believed that [REDACTED] mistakenly extrapolated that he [REDACTED] had received oral sex from the woman from the conversation he and [REDACTED] had in the vehicle that night on the way back to the hotel from [REDACTED] said he mentioned to [REDACTED] and that he did not even get "excited" during the lap dance. According to [REDACTED] replied, [REDACTED]

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] underwent an OIG compelled polygraph examination. The first series of questions concerned whether [REDACTED] engaged in sex acts with a prostitute at [REDACTED] at the [REDACTED] bar. An analysis of the data from this series of questions indicated deception by [REDACTED] in response to the polygraph

questions. [REDACTED] was interviewed after being informed that he was deceptive in his responses to the series of questions presented. During the interview, [REDACTED] continued to deny the allegations.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] during [REDACTED] OIG compelled interview, [REDACTED] stated that [REDACTED] is a nice gentleman's club [REDACTED] with his [REDACTED] counterparts and others.

[REDACTED] stated that [REDACTED] described the VIP rooms as "massive" and containing a pool table and a karaoke machine. Food, drink, and women are brought into the room and everyone picks a woman with whom to sit for the evening.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] stated that on that particular night, he got a VIP room "like every normal night" and that women were brought into the room. [REDACTED] stated that he asked the women to raise their hands if they spoke English so that everyone could communicate with one another. According to [REDACTED] inside the VIP room there were probably 35-40 people, including 10-15 [REDACTED] police officers, himself, and [REDACTED]

[REDACTED] stated there was not a bathroom inside the VIP room so people were coming and going throughout the night. [REDACTED] stated that at one point during the evening a [REDACTED] police officer known as [REDACTED] came to him and stated that [REDACTED] was asking for a private room. [REDACTED] told [REDACTED] to tell [REDACTED] that there were no private rooms at [REDACTED] stated that he believed [REDACTED] wanted a private room to smoke a cigarette or get a lap dance. He stated that prostitution "never crossed [his] mind" as he had been to [REDACTED] and never observed prostitution or even a patron receiving a lap dance. [REDACTED] denied negotiating any sex acts for [REDACTED] and stated that [REDACTED] would have had to negotiate any sex acts on his own.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] stated there was no way that [REDACTED] received oral sex in the VIP room as alleged by [REDACTED] [REDACTED] said that if [REDACTED] saw [REDACTED] receiving oral sex, it had to have been somewhere else in the club. However, he reiterated that he has never heard of someone engaging in sex acts inside [REDACTED] adding "It's just not a place that you do that there."

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] stated that at the end of the night the bill was given to [REDACTED] and [REDACTED] stated, "You owe this per person." [REDACTED] said [REDACTED] then collected money from the [REDACTED] police officers and told [REDACTED] what amount to pay him. After [REDACTED] collected the money from the other [REDACTED] he gave the money to [REDACTED] who then paid the bill. [REDACTED] added that he has never been to [REDACTED] without a [REDACTED] liaison and has never actually seen a bill in person. According to [REDACTED] the [REDACTED] liaison speaks with the manager, obtains the bill, and then tells him how much he owes.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] stated that prostitution is illegal in [REDACTED] so there is no way that the \$70-\$80 (US) that [REDACTED] alleged he paid for oral sex would have been on the bill. He further stated that if the sex act occurred as [REDACTED] alleged, [REDACTED] would have had to pay for the sex act on his own.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] stated he had no knowledge of a woman from [REDACTED] riding back in the vehicle with [REDACTED] and [REDACTED] to their hotel, as he left [REDACTED] before they departed. [REDACTED] stated he did not go to the [REDACTED] the next day since he was working in the office. Therefore, he stated that he had no discussions with [REDACTED] and [REDACTED] about a woman from [REDACTED] returning to their hotel with them.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] underwent an OIG compelled polygraph examination. The first series of questions concerned whether [REDACTED] arranged and/or paid for prostitutes for other FBI employees at the [REDACTED] [REDACTED] An analysis of the data from this series of questions indicated deception by [REDACTED] in response to the polygraph questions. [REDACTED] was interviewed after being informed that he

was deceptive in his responses to the series of questions presented. During the interview, [REDACTED] continued to deny the allegations.

b6 Per FBI and OIG
b7C Per FBI and OIG

Engaging in Commercial Sex [REDACTED]

The information provided to the OIG by IIS alleged that [REDACTED] hosted a [REDACTED] during which [REDACTED] organized an outing to a bar called [REDACTED] with [REDACTED] and [REDACTED]. Also present were members of the [REDACTED] police. [REDACTED] stated that [REDACTED] negotiated a prostitution transaction for him because [REDACTED] did not speak the native language. [REDACTED] stated the negotiation included paying the bar fine to get the prostitute out of the bar; telling the cab driver which hotel to take him and the prostitute to; and how much money he needed to pay the prostitute for the sex act.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED], during [REDACTED] OIG compelled interview, [REDACTED] stated that on a different night during the [REDACTED] the same group [REDACTED] (he, [REDACTED] and [REDACTED] along with members of the [REDACTED] police, attended an event hosted by [REDACTED] at a karaoke bar named [REDACTED]. [REDACTED] stated the scenario was basically the same as at [REDACTED] in that everyone was socializing and drinking with women. After about two hours, [REDACTED] stated he wanted to have sex with the woman with whom he had been sitting but because of a language barrier, he was not personally able to negotiate the transaction. [REDACTED] asked [REDACTED] how it worked at [REDACTED] if he wanted to have sex with the woman with whom he had been sitting. [REDACTED] first spoke to the woman in [REDACTED] in [REDACTED] presence, and then spoke to one of the [REDACTED] police officers, whom [REDACTED] believed to be named [REDACTED] also in [REDACTED] presence.

b6 Per FBI and OIG
b7C Per FBI and OIG

According to [REDACTED] then negotiated between [REDACTED] and the woman the price for sex. [REDACTED] stated that [REDACTED] was standing beside [REDACTED] and knew that [REDACTED] was speaking to the woman on [REDACTED] behalf. [REDACTED] added there was also a time that the woman and [REDACTED] walked off and had an entirely private conversation. Shortly thereafter, [REDACTED] stated that [REDACTED] walked him [REDACTED] and the woman outside and hailed them a taxi. [REDACTED] stated that he told [REDACTED] he wanted to take the woman to a hotel, so [REDACTED] informed the taxi driver which hotel to take them to. [REDACTED] stated that [REDACTED] was present outside while [REDACTED] communicated with the woman and the taxi driver. [REDACTED] described the hotel to which he took the woman as "a by the hour type facility." [REDACTED] added that the hotel cost approximately \$10-\$15 and that once inside the hotel room he paid the woman approximately \$100 for sex.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] during [REDACTED] OIG compelled interview, [REDACTED] acknowledged that on a different night [REDACTED] the same group [REDACTED] (himself, [REDACTED] and [REDACTED] along with members of the [REDACTED] police, attended a karaoke bar called [REDACTED].

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] stated that on that particular night, the women were brought into the room and he again asked the women to raise their hands if they spoke English so that everyone could communicate with one another. According to [REDACTED] at one point in the night [REDACTED] approached him and asked [REDACTED] to wait for him. [REDACTED] told the OIG, "And I said where are you going? He said just wait for me and I said okay. And he literally walked out" with the woman he had picked. [REDACTED] said he asked [REDACTED] if [REDACTED] was going to be okay as he was concerned about [REDACTED] safety. [REDACTED] stated that [REDACTED] replied that [REDACTED] would be fine. At the time, [REDACTED] thought [REDACTED] and the woman were going to get something to eat from one of the food trucks parked outside [REDACTED] or to smoke a cigarette.

[redacted] stated that he had no knowledge that [redacted] wanted to, and did, escort a woman from [redacted] to a hotel, where he paid her for sex. [redacted] stated that [redacted] had known [redacted] for a while and that he remembered [redacted] talking to [redacted] but that he "was not privy to that discussion." When [redacted] was questioned about being outside [redacted] when [redacted] and the woman left in a taxi, [redacted] told the OIG, "Absolutely not. I didn't know until right now that he got in a cab. Until right this second, I had no idea that he got into a cab." [redacted] added that if [redacted] did in fact negotiate sex for [redacted] neither [redacted] nor [redacted] ever mentioned anything about the transaction to him.

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] stated that at the end of the evening, [redacted] had not returned when [redacted] received the bill. Therefore, [redacted] paid for [redacted] share of the bill and then walked outside as [redacted] happened to be walking up the street. [redacted] stated he never asked [redacted] where he went, but just got a taxi for [redacted] and [redacted] to go back to their hotel. Then he hailed a cab back to his own residence.

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] underwent an OIG compelled polygraph examination. The first series of questions concerned whether [redacted] arranged or paid for prostitutes for other FBI employees at the [redacted]. An analysis of the data from this series of questions indicated deception by [redacted] in response to the polygraph questions. [redacted] was interviewed after being informed that he was deceptive in his responses to the series of questions presented. During the interview, [redacted] continued to deny the allegations.

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted]

[redacted] during [redacted] OIG compelled interview, [redacted] acknowledged that on a different night during the [redacted] the same group [redacted] (he, [redacted] and [redacted] along with members of the [redacted] police, went to a karaoke bar called [redacted]

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] stated the scenario was basically the same as at [redacted] in that everyone was hanging out and "drinking, singing, talking, playing dice games" with women. [redacted] stated he had no idea that [redacted] ever left [redacted] with a woman, got into a taxi, and went to a hotel where [redacted] paid the woman for sex. [redacted] did not recall meeting [redacted] on the street outside of [redacted] at the end of the night. He stated, "You know I'd be lying to you if I knew he even left. I didn't know he even left." [redacted] stated the [redacted] was the first time he had spent time with [redacted] so [redacted] questioned "why would I ever imagine he was doing that kind of stuff."

b6 Per FBI and OIG
b7C Per FBI and OIG

Additionally, [redacted] stated he had been drinking and was tired, so he was not keeping tabs on [redacted] also denied having any knowledge of [redacted] negotiating a prostitution transaction for [redacted]

[redacted]

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] during [redacted] OIG compelled interview, [redacted] acknowledged that on a different night during the [redacted] the same group [redacted] (he, [redacted] and [redacted] along with members of the [redacted] police, attended an outing at a karaoke bar. [redacted] believed the [redacted] returned to [redacted] again for the second outing rather than [redacted] as [redacted] and [redacted] recalled [redacted] denied having any knowledge of [redacted] negotiating a prostitution transaction for [redacted] [redacted] also denied having any knowledge that [redacted] left the karaoke bar with a woman, got into a taxi, and went to a hotel where [redacted] paid the woman for sex.

Engaging in Commercial Sex [REDACTED] at the [REDACTED] [REDACTED] Gentleman's Club

b6 Per FBI and OIG
b7C Per FBI and OIG

The information provided to the OIG by IIS alleged that in [REDACTED] hosted a [REDACTED] in [REDACTED]. According to [REDACTED] and [REDACTED] attended an event that [REDACTED] hosted at a local bar. [REDACTED] stated that during the evening, [REDACTED] had sex with a prostitute in the bar and tried to leave the bar without paying for the sex. After being told he needed to pay, [REDACTED] paid [REDACTED] approximately \$40 for the sex.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] during [REDACTED] OIG compelled interview, [REDACTED] stated that on the second night of the [REDACTED] he took [REDACTED] and [REDACTED] to a gentleman's club called [REDACTED]. Also present were [REDACTED] Police officers [REDACTED]. Once inside the club, [REDACTED] stated that he, [REDACTED] and [REDACTED] went into a private karaoke room where women were brought out and each of them picked a woman with whom to sit. [REDACTED] stated, [REDACTED]

[REDACTED] According to [REDACTED] after a few hours he went downstairs with a prostitute to a private room where the [REDACTED] was located. Here, [REDACTED] stated he paid approximately \$40 for sex with the prostitute and that he wore a condom. [REDACTED] stated that [REDACTED] also left with one of the women, but [REDACTED] could not recall if [REDACTED] also went downstairs to [REDACTED] or to another karaoke room. To [REDACTED] knowledge, [REDACTED] and [REDACTED] never left the original karaoke room until it was time to leave.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] stated that as he, [REDACTED] and [REDACTED] were leaving [REDACTED] for the night, a bar employee approached him [REDACTED] and said, "Hey, your buddy didn't pay," referring to [REDACTED]. [REDACTED] told the OIG that his conversation with [REDACTED] was as follows:

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED]

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] told the OIG that he did not believe the woman would have asked for money if she did not think she was entitled to it.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] during [REDACTED] OIG compelled interview, [REDACTED] acknowledged that he was present on the second night [REDACTED] with [REDACTED] and [REDACTED] at a bar called [REDACTED]. He stated that each [REDACTED] picked a woman to sit with them while in a private karaoke room. During the evening, the woman with whom [REDACTED] had been sitting asked him if he wanted "more privacy." [REDACTED]

stated "sure" and the two got up and went to another room that was "made for only two people." [redacted] stated he only stayed in the private room for two or three songs and received a lap dance. [redacted] acknowledged that the woman let him touch her breasts during the lap dance. [redacted] stated that, as they were leaving the bar for the evening, [redacted] approached him and asked him if he had left the private karaoke room where everyone was sitting. [redacted] told [redacted] that he had gone to an adjacent room with the woman with whom he had been sitting. According to [redacted] gave him a look as if to say, that's what you owe me money for. [redacted] said he ended up giving [redacted] to pay the bar fee. [redacted] stated that he believed he was paying [redacted] for the "VIP" room and denied engaging in any sex acts while in the private room.

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] underwent an OIG compelled polygraph examination. The second series of questions concerned whether [redacted] engaged in sex acts with a prostitute at the [redacted]. An analysis of the data from this series of questions indicated deception by [redacted] in response to the polygraph questions. [redacted] was interviewed after being informed that he was deceptive in his responses to the series of questions presented. During the interview, [redacted] continued to deny the allegations.

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] during [redacted] OIG compelled interview [redacted] acknowledged that he was present on the second night of [redacted] with [redacted] and [redacted] at a bar. [redacted] stated that once they arrived at [redacted] they met with [redacted] in a larger room with a stage and then after about 15-20 minutes, [redacted] and he, along with about two or three [redacted] officers, went to a private karaoke room. [redacted] stated that soon thereafter women entered the room and one woman sat with each [redacted] and [redacted] officer. [redacted] told the OIG that he is a [redacted] so a big part of these situations, where he knows he is never going to see a person again, is to [redacted]. [redacted] stated that he offered to pay [redacted] for the night's food and drink but [redacted] told him "it's covered." [redacted] stated that [redacted] did not explain any further. Based on his prior experience with host nations, [redacted] understood that that generally means that the host country is covering the cost. [redacted] stated, [redacted] added that he was not sure how the women who sat with them were compensated for their time.

b6 Per FBI and OIG
b7C Per FBI and OIG

The OIG questioned [redacted] about whether he observed [redacted] leave the private karaoke room with a woman that night. [redacted] responded, "I don't believe so, no." After the OIG advised [redacted] that [redacted] acknowledged leaving the private karaoke room and going downstairs to [redacted] and that [redacted] further acknowledged having paid \$40 for sex, [redacted] responded, [redacted].

b6 Per FBI and OIG
b7C Per FBI and OIG

The OIG further questioned [redacted] about whether he remembered seeing [redacted] leave the private karaoke room with a woman. [redacted] responded, "I don't. Same situation." [redacted] was also questioned by the OIG about whether anything noteworthy happened when [redacted] and he were leaving the establishment. [redacted] said that [redacted] shook hands with [redacted] but that he was not part of that exchange. [redacted] stated that he [redacted] tends to gravitate a little further away from the group, because [redacted] compared to [redacted].

[redacted] said that if someone from [redacted] had approached [redacted] about [redacted] not paying, he "was [redacted]."

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] during [redacted] OIG compelled interview, [redacted] acknowledged that he was present on the second night of [redacted] with [redacted] and [redacted] at a bar called [redacted] stated that, when they arrived at the bar, [redacted] advised them that [redacted]

[redacted] could not recall [redacted] acknowledged that [redacted]

[redacted] said that once inside [redacted] he [redacted] and [redacted] met with a "bunch" of [redacted] officers and went to a private karaoke room. [redacted] said that women were brought into the room and everyone picked a woman with whom to sit and drink for the evening.

b6 Per FBI and OIG
b7C Per FBI and OIG

The OIG questioned [redacted] as to whether he ever observed [redacted] leave the private karaoke room with a woman. [redacted] responded, "There was a band outside on the stage and you came and left. Yeah he probably left." [redacted] stated he had "no idea" that [redacted] went downstairs to a private room and paid \$40 for sex.

b6 Per FBI and OIG
b7C Per FBI and OIG

The OIG also questioned [redacted] as to whether he ever observed [redacted] leave the private karaoke room with a woman. [redacted] responded, [redacted]

[redacted] stated he thought [redacted] went next door to either smoke a cigarette or receive a lap dance but never asked [redacted] and [redacted] never told him, if he participated in any sex acts in the room next door.

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] was further questioned by the OIG concerning whether anything happened when he, [redacted] and [redacted] were leaving the establishment. [redacted] stated that at the end of the night, he and [redacted] immediately walked out and waited by the vehicle for [redacted] and [redacted] stated, "I did not hear that conversation at all."

b6 Per FBI and OIG
b7C Per FBI and OIG

Host Law Enforcement Provides Prostitutes During [redacted]

The information provided to the OIG by IIS alleged that in [redacted] during which [redacted] and [redacted] participated in prostitution paid for by the Host Law Enforcement, [redacted] Police [redacted] During the course of the OIG investigation, we learned that that [redacted] may also have participated in prostitution paid for by the [redacted] at the [redacted]

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] during [redacted] OIG compelled interview, [redacted] stated that on the third night of the [redacted] [redacted], he took [redacted] and [redacted] to a karaoke bar inside [redacted] Also present were [redacted] officers. In the hotel's karaoke bar, women were brought into the room and each [redacted] chose a woman with whom to sit for the evening. [redacted] stated, [redacted] [redacted] stated that, at one point in the evening, [redacted] walked over, handed each [redacted] a room key, and stated, "Your rooms (sic) ready." [redacted] stated that he and the woman with him stood up, as did the other [redacted] and that he left the karaoke bar and went to his assigned hotel room with the woman. [redacted] said [redacted] and [redacted] all stood up when he did but that he did not see them leave the karaoke bar because he and the woman whom he was with left the karaoke bar first. [redacted] stated

that when he returned to the karaoke bar from the hotel room, not all the [REDACTED] had returned. [REDACTED] believed that [REDACTED] was already in the karaoke bar when [REDACTED] returned, but he could not recall which other [REDACTED] returned before him.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] stated that in the assigned hotel room, he engaged in sexual intercourse with the woman from the karaoke bar. Because he did not pay for the sex, [REDACTED] stated that he believed the [REDACTED] paid for the sex on his behalf. [REDACTED] stated he had no knowledge what [REDACTED] and [REDACTED] did in their respective hotel rooms, stating only, "My understanding is that we all got room keys. And my understating is we all walked out of that karaoke room at some point." [REDACTED] added, "When we came back we didn't have any discussion about who did what."

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] stated that prior to arriving at [REDACTED] he did not inform [REDACTED] or [REDACTED] that the [REDACTED] would offer each [REDACTED] a prostitute, as he did not have any prior knowledge that this would happen. [REDACTED] stated that once he [REDACTED] and [REDACTED] left the hotel he asked, "Did you guys have to pay?" [REDACTED] stated that either [REDACTED] or [REDACTED] answered, "No." [REDACTED] said he replied, "Okay, because I didn't." [REDACTED] stated that he, [REDACTED], and [REDACTED] never spoke about that night again.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] during [REDACTED] OIG compelled interview, [REDACTED] acknowledged that during the [REDACTED] hosted by [REDACTED] he was present with [REDACTED] and [REDACTED] along with members of the [REDACTED]. In the hotel's karaoke bar, each [REDACTED] picked a woman with whom to sit for the evening. At one point in the evening, the women with whom the [REDACTED] had been sitting got up and left the karaoke bar. According to [REDACTED] shortly thereafter, an older woman approached the group at the karaoke bar and handed a set of numbered cards to a high ranking [REDACTED] official who was sitting with the [REDACTED]. [REDACTED] told the OIG that the [REDACTED] official then accompanied the [REDACTED] on the elevator and directed each [REDACTED] to a separate room in the hotel corresponding to the numbered cards. [REDACTED] told the OIG that he went into his designated hotel room without saying anything, because he did not want to offend the [REDACTED]. [REDACTED] stated that once inside his designated hotel room, the woman with whom he had been sitting in the karaoke bar entered. [REDACTED] stated that the woman asked him to get into the shower. [REDACTED] stated that he told her that he would not get into the shower with her, nor do anything else with her, and that he was not going to pay her. [REDACTED] told the OIG that the woman said she would get paid regardless. [REDACTED] said he remembered his earlier conversation in the karaoke bar with this woman [REDACTED]. [REDACTED] so [REDACTED] stated they just conversed about [REDACTED]. [REDACTED] stated that after a short time, [REDACTED] had the woman direct him back to the karaoke bar. [REDACTED] told the OIG that when [REDACTED] came downstairs, [REDACTED] gave him a look and [REDACTED] gave him a look back meaning, "what the hell was that." [REDACTED] stated that the group did not discuss what had gone on in the hotel rooms and no one said a word in the car ride back to the hotel. [REDACTED] denied having any sexual contact with the woman while they were alone in the hotel room.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] underwent an OIG compelled polygraph examination. The second series of questions concerned whether [REDACTED] engaged in sex acts with a prostitute at the [REDACTED]. [REDACTED] An analysis of the data from this series of questions indicated deception by [REDACTED] in response to the polygraph questions. [REDACTED] was interviewed after being informed that he was deceptive in his responses to the series of questions presented. During the interview, [REDACTED] continued to deny the allegations.



[REDACTED]

[REDACTED] told the OIG that he did not feel he needed to report [REDACTED] or [REDACTED] conduct because he did not know what they did in their hotel rooms. [REDACTED] told the OIG that he would never have talked to [REDACTED] or [REDACTED] about what went on in their hotel rooms because of the association of shame with these types of allegations, an association that [REDACTED] attributed to his [REDACTED]

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED]

[REDACTED] during [REDACTED] OIG compelled interview, [REDACTED] acknowledged being present with [REDACTED] and [REDACTED] along with members of the [REDACTED]. In the hotel's karaoke bar, each [REDACTED] chose a woman with whom to sit for the evening. At one point in the evening, the women with whom [REDACTED]

b6 Per FBI and OIG
b7C Per FBI and OIG

the [redacted] had been sitting stood up and left the karaoke bar. [redacted] stated that shortly thereafter, each [redacted] was handed a piece of paper with three or four numbers written on it and directed to the hotel elevator by a member of the [redacted] stated that a [redacted] officer directed him to get off the elevator on a certain floor, and then a hotel employee or another [redacted] officer directed him to a hotel room that corresponded to the number on the piece of paper he had been provided in the karaoke bar.

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] stated that once inside his designated hotel room, he noticed that the woman with whom he had been sitting in the karaoke bar was already waiting inside. [redacted] stated that he felt "very uncomfortable" and did not know what to do because he had never been in this situation before. He stated that the woman asked him if he would like to "have fun." [redacted] said he sat on the edge of the bed and the woman sat next to him. [redacted] told the OIG that during his conversation with the woman she was "indicating" sex, so he told her he only wanted a massage. [redacted] stated he then received a shoulder and neck massage over the top of his clothing. [redacted] stated that after a short time, the woman escorted him back down to the karaoke bar. [redacted] told the OIG that [redacted] then drove [redacted] and him back to the hotel, and that no one said a word in the car. [redacted] said that he did not say anything in the car because he was angry at [redacted] for having put him in a bad situation and "if I would have said something we would have gotten into a big fight," and that the others "didn't seem happy in the car" either. [redacted] denied having any sexual contact with this woman while they were alone in the hotel room.

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] underwent an OIG compelled polygraph examination. The third series of questions concerned whether [redacted] engaged in sex acts with a prostitute at the [redacted]. An analysis of the data from this series of questions indicated deception by [redacted] in response to the polygraph questions. [redacted] was interviewed after being informed that he was deceptive in his responses to the series of questions presented. During the interview, [redacted] continued to deny the allegations.

Host Law Enforcement Provides Prostitutes [redacted]

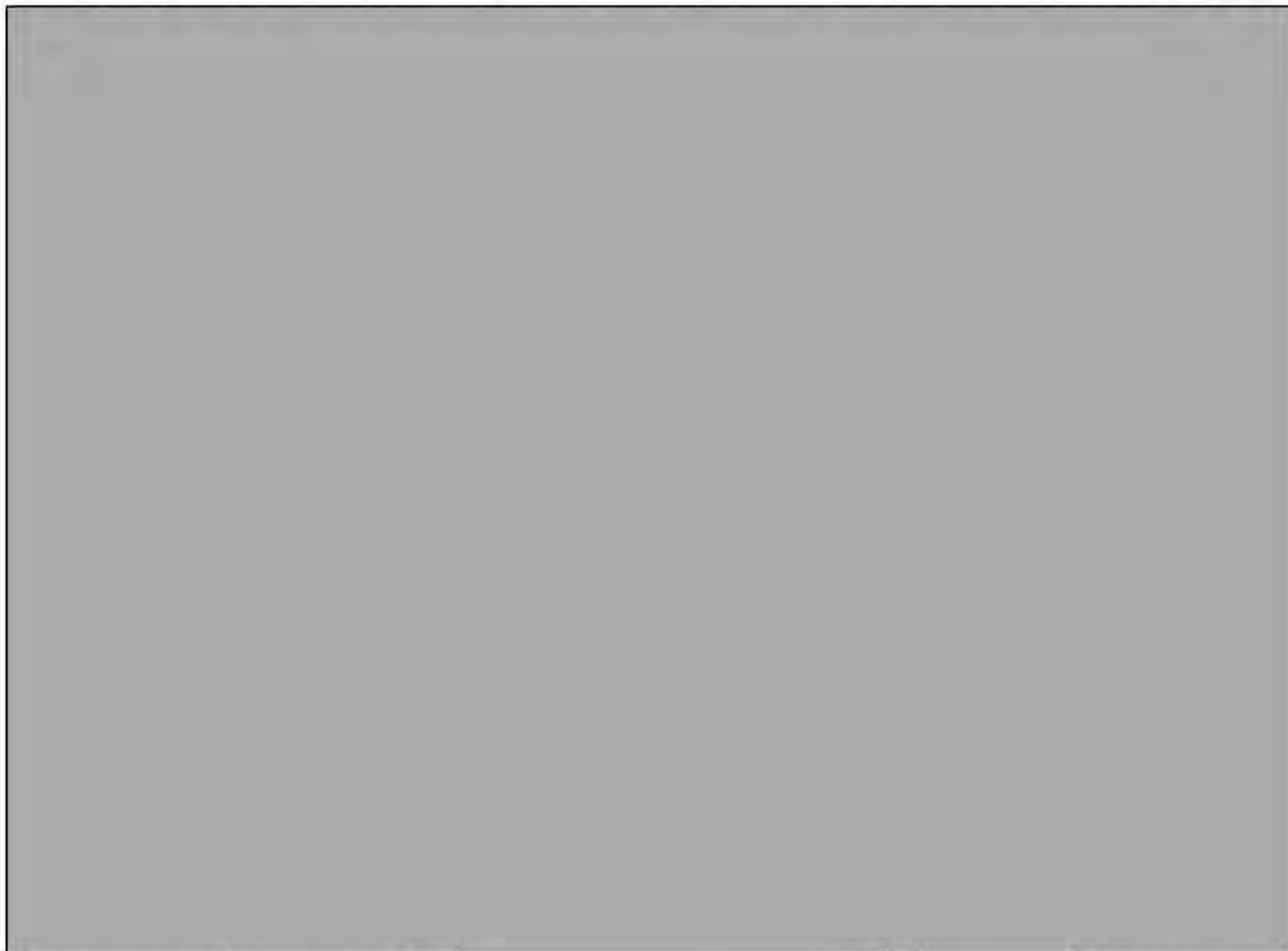
b6 Per FBI and OIG
b7C Per FBI and OIG

The information provided to the OIG by IIS alleged that between [redacted] and [redacted] where they attended a dinner with [redacted]. According to [redacted] officers offered to send prostitutes to his and [redacted] hotel rooms. [redacted] stated that after he returned to his hotel room, a prostitute showed up at his hotel room. Shortly thereafter, [redacted] stated that another prostitute showed up at his hotel room indicating that [redacted] had denied her entry to his room. [redacted] admitted to having sex with both prostitutes separately and to receiving oral sex from one of the prostitutes.

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] during [redacted] OIG compelled interview [redacted] stated that while [redacted] he had [redacted] with [redacted]. During that time, he and [redacted] attended a dinner with [redacted]. According to [redacted] at the dinner, [redacted] officers offered to send prostitutes to [redacted] and [redacted] hotel rooms. [redacted] stated that he and [redacted] were staying in villas that had been reserved by [redacted]. [redacted] stated that that evening, after [redacted] returned to his villa from dinner, a prostitute showed up at his villa. [redacted] stated that shortly thereafter, another prostitute showed up at his villa indicating that [redacted] had denied her entry to his room. [redacted] admitted to having sex with both prostitutes separately and to receiving oral sex from one of the prostitutes. [redacted] added that since [redacted] he has paid for or had sex with prostitutes [redacted] stated that there have been "zero occasions" where the [redacted] tried to leverage him as a result of their providing him with a prostitute, adding this is a "cultural thing unfortunately."

[redacted] stated that the next morning, he and [redacted] had a brief conversation in the vehicle ride back to [redacted] about the previous night [redacted] stated, "I think [redacted] asked me like hey, how was, how did everything go? And I was like yeah, it went great for me. It's, I understand you didn't want her to come in? And he's like yeah, you know." b6 Per FBI and OIG
b7C Per FBI and OIG



Engaging in Commercial Sex [redacted] at [redacted] Massage Parlor

b6 Per FBI and OIG
b7C Per FBI and OIG

The information provided to the OIG by IIS alleged that between [redacted] and [redacted] at the time, visited the massage parlor [redacted] to engage in sex.

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] during [redacted] OIG compelled interview, [redacted] stated that [redacted] he visited the massage parlor [redacted] stated at [redacted] there were women behind glass and patrons could choose a prostitute and then receive a massage for approximately \$30. According to [redacted] after you choose your prostitute you are escorted to a private room and the prostitute asks you to disrobe for the massage and lay on your stomach. The prostitute gives you a massage and

then asks you to flip over on your back. Then, the prostitute asks if you want "extra services." [redacted] stated that on his first trip to [redacted] he told the prostitute it was his first time and that he did not know what was available. The prostitute said sex was \$50 and oral sex was \$30. [redacted] requested sex and engaged in sexual intercourse with the prostitute, thereafter, paying the prostitute for the sex. [redacted] stated that he visited [redacted] and paid for sex with a different prostitute each time. [redacted] and in addition to [redacted] stated that he paid for sex with prostitutes whom he met at various bars [redacted] times.

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] stated that [redacted] he suggested to [redacted] that they go to [redacted] together. [redacted] stated that prior to going to [redacted] he and [redacted] discussed the "girls" and "extra services" one could receive at [redacted] said that it was clear to both him and [redacted] that sex was "for sale" at [redacted] and that was the reason for their visit to the establishment. [redacted] stated that he paid for sex on both visits to [redacted] when [redacted] accompanied him and that [redacted] indicated he had completed a sex act during the visits to [redacted] as well. [redacted] stated that [redacted] called him years later to tell him that [redacted] had closed.

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] during [redacted] OIG compelled interview, [redacted] acknowledged going to [redacted] with [redacted] [redacted] stated that once inside [redacted] there were women located behind a glass wall. The women were scantily dressed and each had a number sign attached to her front. On each of the two occasions, [redacted] stated that he and [redacted] each picked a woman and then went to separate rooms to receive a massage from the woman. [redacted] stated that once inside his room, he undressed but kept on his underwear and undershirt to receive his massage. [redacted] stated that on both occasions he paid ten dollars for the massage. [redacted] denied paying for or receiving oral sex or engaging in sexual intercourse with his masseuse. [redacted] stated that [redacted] never told him that he had paid for or engaged in sexual intercourse while they were at [redacted]

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] underwent an OIG compelled polygraph examination. The first series of questions concerned whether [redacted] engaged in sex acts with prostitutes at the massage parlor [redacted] An analysis of the data from this series of questions indicated deception by [redacted] in response to the polygraph questions. [redacted] was interviewed after being informed that he was deceptive in his responses to the series of questions presented. During the interview, [redacted] continued to deny the allegations.

[redacted] Search for Information about How to Delete Data from an SD Card

Following the initiation of the OIG's investigation, the OIG conducted a forensic data extraction for [redacted] FBI-issued [redacted] purchased by [redacted] containing an FBI-purchased SIM card that he used as his "in country" phone. According to [redacted] International Operations Division, both the FBI-issued phones and the in country phones "fall under the FBI policy guides and directives governing mobile devices, social media, ethics etc."

b6 Per FBI and OIG
b7C Per FBI and OIG

The OIG's Cyber Investigations Office (CIO) conducted a forensic data extraction that uncovered information indicating that on [redacted] used the Safari search engine on his [redacted] to Google search the term "How to Fully Erase an SD Card Chron.com." The OIG identified <https://smallbusiness.chron.com/fully-erase-sd-card-43450.html> as the URL web address that was generated and captured in the forensic data extraction results when [redacted] had entered this internet search term into his phone. This URL returned an article written by [redacted] titled *How to Fully Erase an SD Card*, which provided directions on how to remove images, audio files, documents and email messages from a phone's SD card.

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] the day after [redacted] conducted this search, [redacted] had a previously scheduled appointment with [redacted] FBI, to discuss [redacted] recall to the United States from [redacted] and the other subjects of this investigation were being recalled by the FBI to the United States due to [redacted] allegations regarding [redacted] involvement in solicitation of prostitution and the other allegations discussed in this report.

b6 Per FBI and OIG
b7C Per FBI and OIG

CIO sent [redacted] FBI-issued [redacted] to a DOJ contractor specializing in Android mobile device analysis to determine if an SD card had ever been installed in [redacted] FBI-issued [redacted]. The contractor's forensic research did not discover evidence of an external SD card present on [redacted] device and was unable to determine if an SD card had ever been present.

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] during [redacted] OIG compelled interview [redacted] stated that he did not remember using the Safari search engine to Google search the term "How to Fully Erase an SD Card Chron.com" or reading the article written by [redacted] titled *How to Fully Erase an SD Card*. [redacted] further denied removing an SD card from his FBI-issued [redacted] prior to relinquishing custody of it to FBI Inspections Division [redacted]

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] underwent an OIG compelled polygraph examination. The third series of questions concerned whether [redacted] removed the SD card from an FBI-issued cell phone. An analysis of the physiological data from this series of questions indicated an inconclusive result; based on this, the polygraph examiner was unable to render a definitive opinion concerning [redacted] answers to this series of questions.

Payment of Money to a Foreign National

b6 Per FBI and OIG
b7C Per FBI and OIG

During the course of the investigation, the OIG reviewed the forensic data extraction results for [redacted] FBI-issued [redacted] and for the [redacted] purchased by [redacted] and containing an FBI-purchased SIM card. The extracted evidence reflected that [redacted] had paid a female [redacted] national [redacted]

b6 Per FBI and OIG
b7C Per FBI and OIG

CIO conducted a forensic data extraction that uncovered a Google Translate from English to [redacted] that [redacted] entered on [redacted] at 07:05pm EST. The following text was recovered, [redacted]

[redacted]

[redacted] Internet searches found that on [redacted] According to the above text, [redacted]

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] during [redacted] OIG compelled interview, after being confronted with these text messages, [redacted] acknowledged paying a female [redacted] national [redacted] [redacted] stated [redacted] and that he would make payments to the woman's [redacted] stated he did not know the woman's proper name. He stated that he only knew her nickname, [redacted] which she used as an employee of the bar [redacted] where [redacted] met her [redacted] stated that he and [redacted] had become friends. He further stated that his friend from the [redacted] police told him that [redacted] [redacted] stated [redacted] added, [redacted]

[REDACTED] said that after a period of time he had to stop making payments to [REDACTED]. [REDACTED] denied that [REDACTED] was a prostitute and that the two of them had ever had a sexual relationship.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] underwent an OIG compelled polygraph examination. The fourth series of questions concerned [REDACTED] alleged unauthorized payments to a [REDACTED] foreign national. An analysis of the data from this series of questions indicated deception by [REDACTED] in response to the polygraph questions. [REDACTED] was interviewed after being informed that he was deceptive in his responses to the series of questions presented. During the interview, [REDACTED] continued to deny that the woman to whom he paid money was a prostitute or that the two of them had ever had a sexual relationship.

Failure to Report Foreign Contacts

b6 Per FBI and OIG
b7C Per FBI and OIG

During the course of the investigation, the OIG reviewed the forensic data extraction results for [REDACTED] and [REDACTED] FBI-issued cell phones. The review included evidence that [REDACTED] and [REDACTED] were each engaged in an unreported sexual relationship with a foreign national. Additionally, the OIG determined during the investigation that [REDACTED] had unreported foreign contact with approximately 10-20 [REDACTED] women. [REDACTED] stated to the OIG that he had sexual contact with more than half of these foreign [REDACTED] nationals.

b6 Per FBI and OIG
b7C Per FBI and OIG

The OIG's Cyber Investigations Office's (CIO) forensic data extraction uncovered evidence that from [REDACTED] [REDACTED] exchanged "WhatsApp³" messages with a person he referred to as [REDACTED] with the WhatsApp number [REDACTED]. Based on the content of the messages exchanged, it was evident that [REDACTED] is a [REDACTED] national with whom [REDACTED] was having a sexual relationship while assigned [REDACTED]. According to the text messages, [REDACTED] met [REDACTED] while she was working as a cocktail waitress at [REDACTED].

b6 Per FBI and OIG
b7C Per FBI and OIG

CIO conducted a forensic data extraction which revealed that from [REDACTED] [REDACTED] exchanged "Viper⁴" messages with a person he referred to as [REDACTED] with the Viper number [REDACTED]. Based on the content of the messages exchanged, it appeared that [REDACTED] was a [REDACTED] national with whom [REDACTED] was having a sexual relationship while assigned as [REDACTED].

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] during [REDACTED] OIG compelled interview, after being confronted with the forensic evidence described above, [REDACTED] acknowledged that in [REDACTED] he had a sexual relationship with a [REDACTED] national whom he met at [REDACTED]. Initially, [REDACTED] denied the sexual relationship, but after consulting with his attorney, [REDACTED] acknowledged the sexual relationship. [REDACTED] claimed to only have known this [REDACTED] national by her nickname [REDACTED] and stated that he did not know her proper name. [REDACTED] stated that [REDACTED] worked as a waitress [REDACTED] not as a prostitute. [REDACTED] stated he had approximately three sexual encounters with [REDACTED] during the [REDACTED].

³ WhatsApp is an American freeware, cross-platform messaging and Voice over IP service owned by Facebook, Inc. It allows users to send text messages and voice messages, make voice and video calls, and share images, documents, user locations, and other media.

⁴ Viper is a cross-platform Voice over IP and instant messaging software application operated by Rakuten. Users are registered and identified through a cellular telephone number. In addition to instant messaging, it allows users to exchange media such as images and videos.

_____ aforementioned timeframe and that all these sexual encounters took place at _____ apartment. _____ further acknowledged that he violated FBI policy by not disclosing his sexual relationship with _____

b6 Per FBI and OIG
b7C Per FBI and OIG

_____ during _____ OIG compelled interview, _____ acknowledged that he had an approximately _____ sexual relationship from _____ with a _____ national known as _____ whom he met at a bar. _____ stated that he did not report the relationship to the FBI. He acknowledged that by not reporting the foreign contact, he was in violation of FBI policy governing such contact. _____ stated that he did not report the aforementioned foreign contact to the FBI because he was too busy with work.

b6 Per FBI and OIG
b7C Per FBI and OIG

_____ underwent an OIG compelled polygraph examination. During _____ first series of pre-test questions, _____ stated that between _____ while posted in _____ he had two additional unreported foreign contacts of a sexual nature that had not been previously reported to the OIG or the FBI. _____ identified the first woman with whom he had a sexual relationship in _____ stated that he and _____ became romantically involved after meeting through a friend and explained that _____ may have been a United States citizen. The second unreported foreign contact was an unnamed _____ woman whom _____ stated he met at a bar in _____ later corrected himself and stated that he met the unnamed _____ national in _____

b6 Per FBI and OIG
b7C Per FBI and OIG

The third series of questions concerned whether _____ withheld any additional sexual contacts with foreign nationals or whether he had any additional unreported foreign contacts. An analysis of the data from this series of questions indicated deception by _____ in response to the polygraph questions.

b6 Per FBI and OIG
b7C Per FBI and OIG

During _____ third series of post-test questions, _____ maintained that, other than the one unreported foreign contact of a sexual nature that he had previously disclosed during his OIG interview, and the two additional unreported foreign contacts of a sexual nature that he had disclosed during the first series of pre-test questions, he was not withholding any other unreported contacts with foreign nationals. _____ further acknowledged that he did not know if the two unreported female contacts that he had disclosed during the first series of pre-test questions were foreign nationals or United States citizens.

b6 Per FBI and OIG
b7C Per FBI and OIG

_____ during an interview with the FBI Security Division (SecD), Analysis and Investigations Unit, that was memorialized in an FD-302, _____ stated that he had a sexual relationship with a woman named _____ while in _____ stated that he _____ also stated that he had had sexual relations with a woman named _____ whose last name he did not know, while in _____ stated that _____ was an adult _____ national who participated in group sex with _____ stated that he had not had sexual relations with anyone else in _____ or any other countries in the region during his _____

b6 Per FBI and OIG
b7C Per FBI and OIG

_____ underwent an OIG compelled polygraph examination on _____ During _____ post-test interview, _____ acknowledged that between _____ while posted in _____ with the FBI, he had unreported foreign contact with approximately 10-20 _____ women. _____ further stated that out of the aforementioned contacts, he had sexual contact with more than half of these foreign nationals.

[REDACTED] and [REDACTED] Lack of Candor Concerning Sex Acts with Prostitutes

The information provided to the OIG by IIS alleged that in [REDACTED] and then [REDACTED] [REDACTED] now retired, solicited two prostitutes and brought them back to [REDACTED] hotel room in [REDACTED] where they had sex with the prostitutes.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] during [REDACTED] OIG compelled interview, [REDACTED] stated that [REDACTED] told him a story that involved [REDACTED] and [REDACTED] soliciting prostitutes. Specifically, [REDACTED] stated that [REDACTED] had told him that while [REDACTED] and [REDACTED] they went to a club in [REDACTED] solicited two prostitutes, and brought the two prostitutes back to [REDACTED] hotel room where they had sex. [REDACTED] stated that [REDACTED] never indicated whether or how he paid for the sex, but that it was [REDACTED] who specifically used the word "prostitute" when describing these women.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] during [REDACTED] OIG compelled interview, [REDACTED] stated that [REDACTED] acknowledged that [REDACTED] During this same time, specifically from [REDACTED] [REDACTED] stated that on one occasion [REDACTED] asked him if he would like to go out for drinks. Later that evening [REDACTED] met [REDACTED] in front of the [REDACTED] Hotel, where [REDACTED] stated that they went to a bar and paid a cover charge to access an upper level. [REDACTED] stated that it was there that he and [REDACTED] met two women, with whom they had drinks and danced. [REDACTED] said he believed the women to be patrons of the bar rather than employees. [REDACTED] stated that at the end of the night, he and [REDACTED] split the cost of the bill. [REDACTED] said he never saw the bill but just gave [REDACTED] the amount of money that [REDACTED] stated he owed. [REDACTED] stated that after the bill was paid [REDACTED] told him that the two women with whom they had been drinking and dancing were going to leave with them.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] stated that he, [REDACTED] and the two women went back to [REDACTED] hotel room at the [REDACTED] Hotel. [REDACTED] stated that in [REDACTED] hotel room, he and [REDACTED] had sex with their respective women from the bar. [REDACTED] stated he had sex with one of the women on one side of the room, and [REDACTED] had sex with the other woman on the opposite side of the room. [REDACTED] stated that he did not pay the woman with whom he had sex and that he did not know if [REDACTED] paid either or both of the women for sex.

b6 Per FBI and OIG
b7C Per FBI and OIG

Additionally, [REDACTED] stated that he returned to this same bar later [REDACTED] without [REDACTED] There he met a different woman and provided her with his hotel and suite number. [REDACTED] stated that he then returned to his hotel and that in the early morning hours the hotel front desk receptionist called his room to say that there was a woman in the lobby for him. [REDACTED] went to the lobby and met the woman from the bar and her girlfriend. [REDACTED] stated that he then escorted both women back to his suite and had sex with both women separately. [REDACTED] stated that shortly thereafter, he gave the woman he had met at the bar money for her and her girlfriend to get a taxi and some food. He did not give any money directly to the girlfriend.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] stated that he did not pay for sex in either of the aforementioned sexual encounters. [REDACTED] stated he has never paid for sex and never would. [REDACTED] stated that he believed the women with whom he had sex were just patrons of the bar and that the situation would be no different than if he had met a woman at a bar in the United States and taken her back to his residence or a hotel and had sex.

[redacted] underwent an OIG compelled polygraph examination. The first series of questions concerned whether [redacted] made payments for sex acts with prostitutes during [redacted]. An analysis of the data from this series of questions indicated deception by [redacted] in response to the polygraph questions.

b6 Per FBI and OIG
b7C Per FBI and OIG

During the post-test part of [redacted] OIG compelled polygraph examination, after being told that the analysis of the polygraph examination indicated deception, [redacted] admitted that between [redacted] [redacted] he paid women for sex. [redacted] explained that during the incident where he had sex with two separate women in his hotel room two weeks prior to his departure [redacted] he paid one of the women approximately \$80 for the sole purpose of engaging in sex acts with both women. [redacted] further stated that there was no negotiation of sex upfront and that he paid the \$80 after he engaged in the sex acts with both women.

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] further admitted to lying during his previous OIG compelled interview on [redacted] regarding whether he made payments to women for engaging in sex acts [redacted] stated that he did not want to admit to the aforementioned payment for sex during his previous OIG interview due to his "pride."

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] during [redacted] OIG compelled interview, [redacted] denied the event described by [redacted] and [redacted] ever happened. Specifically, [redacted] stated that [redacted] he never went to a club with only [redacted] solicited a prostitute with [redacted] brought a prostitute back to [redacted] hotel room, or engaged in sex acts with a prostitute. [redacted] stated about [redacted] Additionally, [redacted] stated that he never paid for any type of sexual contact with a prostitute in [redacted] or any other country.

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] underwent an OIG compelled polygraph examination. The third series of questions concerned whether [redacted] engaged in sex acts with prostitutes in [redacted] in the company of [redacted]. An analysis of the data from this series of questions indicated deception by [redacted] in response to the polygraph questions. [redacted] was interviewed after being informed that he was deceptive in his responses to the series of questions presented. During the interview, [redacted] continued to deny the allegations.

Delivery of a Package on Behalf of [redacted]

b6 Per FBI and OIG
b7C Per FBI and OIG

The information provided to the OIG by IIS alleged that in [redacted] provided [redacted] with a package containing approximately 100 white pills that [redacted] was to deliver to [redacted] Police.

b6 Per FBI and OIG
b7C Per FBI and OIG

[redacted] during [redacted] OIG compelled interview, [redacted] stated that in [redacted] he and [redacted] worked together in the [redacted] stated that during this time, [redacted] provided him with a package and requested that [redacted] deliver the package to [redacted] Police known as [redacted] stated that he was to deliver the package when he attended either [redacted] According to [redacted] he received a sealed package from [redacted] stated that when he arrived home, he opened the sealed package and found it to contain [redacted] and approximately 100 white pills. [redacted] stated

that the pills were not commercially wrapped and bore no markings that he recognized. [REDACTED] stated he was not comfortable with transporting the pills, so he disposed of them at his residence before going on the trip. Once in [REDACTED] gave the package, now containing [REDACTED] Police officer whom [REDACTED] had designated.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] during [REDACTED] OIG compelled interview, [REDACTED] acknowledged that [REDACTED] he gave a package to [REDACTED] to take to [REDACTED] Police officer known as [REDACTED] stated that the package contained [REDACTED] When questioned by the OIG as to the origin of the approximately 100 white pills that [REDACTED] alleged to have been inside the package [REDACTED] stated that he had no knowledge of any pills being inside the package. [REDACTED] stated that the package had been mailed to him by [REDACTED] who resided in [REDACTED] at the time. [REDACTED] did not recall the name of [REDACTED] [REDACTED] then stated that he "misspoke" when he said the package had contained [REDACTED] [REDACTED] because he never opened the package to check its contents before giving the package to [REDACTED] stated he knew how [REDACTED] but because that is what [REDACTED] had told him was inside the package. [REDACTED] stated that [REDACTED] was an [REDACTED] [REDACTED] so he trusted [REDACTED] and had no need to open the package to check its contents.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] underwent an OIG compelled polygraph examination. The second series of questions concerned whether [REDACTED] observed or placed pills in a package to [REDACTED] An analysis of the data from this series of questions indicated deception by [REDACTED] in response to the polygraph questions. [REDACTED] was interviewed after being informed that he was deceptive in his responses to the series of questions presented. During the interview, [REDACTED] continued to deny the allegations.

OIG's Conclusion

b6 Per FBI and OIG
b7C Per FBI and OIG

The OIG substantiated the allegations that [REDACTED] and [REDACTED] solicited and procured commercial sex and that [REDACTED] solicited commercial sex. The OIG concluded that [REDACTED] [REDACTED] and [REDACTED] all violated FBI Offense Code 4.6, Indecent/Lascivious Acts, on one or more occasions each, and that [REDACTED] and [REDACTED] violated the AG Memo Prohibiting Prostitution, as described below.⁵ We concluded that [REDACTED] and [REDACTED] made false statements about their interactions with prostitutes during their OIG compelled interviews and that [REDACTED] also made such false statements during his compelled polygraph examination, in violation of 18 U.S.C. § 1001. In addition, we concluded that [REDACTED] [REDACTED] and [REDACTED] violated FBI Offense Code 2.6, Lack of Candor/Lying – Under Oath, for lying during their OIG compelled interviews and that [REDACTED] and [REDACTED] violated FBI Offense Code 2.5, Lack of Candor/Lying – No Oath, for lying during their OIG compelled polygraph examinations. We also found that [REDACTED] violated FBI Offense Code 2.5, Lack of Candor/Lying – No Oath, when he lied during an interview with the FBI SecD, [REDACTED] In addition, we concluded that [REDACTED] and [REDACTED] all violated FBI Offense Code 5.7, Failure to Report – Administrative, and FBI Policy Directive 0535D – Unofficial Contacts and Reporting Requirements, when they failed to report financial or intimate relationships with foreign nationals, including foreign nationals from whom some of them procured commercial sex.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED] However, the OIG investigation concluded that [REDACTED] violated the AG Memo Prohibiting Prostitution and FBI Offense Code 5.23, by failing to report suspected violations of the AG Memo Prohibiting Prostitution by [REDACTED] and [REDACTED] at [REDACTED]

b6 Per FBI and OIG
b7C Per FBI and OIG

⁵ The OIG did not include findings for violating the AG Memo Prohibiting Prostitution for [REDACTED] and [REDACTED] because his misconduct occurred prior to April 10, 2015.

[REDACTED] We similarly concluded that [REDACTED] and [REDACTED] violated FBI Policy Directive 0796D - Reporting FBI Employee Misconduct, and FBI Offense Code 5.8, Failure to Report - Criminal/Serious, by failing to report their own misconduct and/or the misconduct of others in connection with the solicitation and procurement of commercial sex.

In addition, the OIG investigation concluded that [REDACTED] violated FBI Offense Code 5.8, Failure to Report - Criminal/Serious, and FBI Policy Directive 0796D - Reporting FBI Employee Misconduct, when he failed to report that [REDACTED] provided him with a package containing approximately 100 white pills that [REDACTED] was to deliver to [REDACTED] Police.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED]

As a general matter, we credited the testimony of [REDACTED] who made many of the allegations contained in this report. [REDACTED] testimony implicated not only others but also himself, which we found lent credibility to his testimony. In addition, while [REDACTED] implicated others in misconduct, we found no indication that he embellished; rather, he described to us the limits of his observations and knowledge. For example, [REDACTED] told the OIG that he had a conversation with [REDACTED] about the additional money [REDACTED] had neglected to pay [REDACTED] for the services of a woman, but caveated that he had not asked [REDACTED] whether he had sex with the woman. Similarly, regarding [REDACTED] and [REDACTED] and the events at the [REDACTED] said, "My understanding is that we all got room keys. And my understanding is we all walked out of that karaoke room at some point," but noted that "[w]hen we came back we didn't have any discussion about who did what." [REDACTED] also made a point of telling the OIG that he could not "reiterate...enough" that not all the women in the establishments described were prostitutes. Finally, [REDACTED] testimony was often consistent with other evidence, including the results of the OIG compelled polygraph examinations of other witnesses.

b6 Per FBI and OIG
b7C Per FBI and OIG

We detail our findings by FBI employee in the subsections that follow.

[REDACTED]

The OIG investigation substantiated the allegations that [REDACTED] solicited, procured, and accepted commercial sex. The OIG concluded that [REDACTED] violated the AG Memo Prohibiting Prostitution and FBI Offense Code 4.6, Indecent/Lascivious Acts, on several occasions. Specifically, [REDACTED] 1) admittedly procured and paid for commercial sex in [REDACTED] during an outing at the karaoke bar, [REDACTED] while attending the [REDACTED] in [REDACTED] (2) admittedly procured and paid for commercial sex [REDACTED] at the karaoke bar [REDACTED] also while attending [REDACTED] (3) admittedly procured and paid for commercial sex [REDACTED] at a gentleman's club [REDACTED] while attending the [REDACTED] in [REDACTED] (4) admittedly accepted commercial sex provided by Host Law Enforcement - [REDACTED] in [REDACTED] at the [REDACTED] while attending the [REDACTED] in [REDACTED] and (5) admittedly accepted commercial sex provided by the [REDACTED] between [REDACTED] [REDACTED] Additionally, [REDACTED] admitted that during [REDACTED] he procured and paid for commercial sex on several occasions between approximately [REDACTED] in [REDACTED] including [REDACTED] at the massage parlor [REDACTED] Additionally, the OIG concluded that [REDACTED] violated FBI Policy Directive 0535D - Unofficial Contacts and Reporting Requirements, and FBI Offense Code 5.7, Failure to Report - Administrative, by failing to report his interactions with the foreign nationals with whom he admittedly engaged in commercial sex. Pursuant to FBI Policy Directive 0535D, all FBI personnel must report unofficial contacts, including intimate contacts, with foreign nationals within five business days.

b6 Per FBI and OIG
b7C Per FBI and OIG

The OIG investigation also concluded that [REDACTED] violated FBI Offense Code 5.8, Failure to Report – Criminal/Serious, and FBI Policy Directive 0796D – Reporting FBI Employee Misconduct. FBI Policy Directive 0796D requires all FBI personnel to report misconduct when they (1) personally witness misconduct, (2) become aware of misconduct committed by another FBI employee and have reason to believe it has not yet been reported, or (3) commit misconduct themselves. Moreover, the AG Memo Prohibiting Prostitution states that “supervisors and managers are subject to discipline for failing to report suspected violations,” and that “suspected violations by Department employees must be immediately reported to the internal affairs personnel of the relevant component’s headquarters . . . Allegations determined to be non-frivolous must also be reported to the component’s security personnel.” [REDACTED] admitted that he procured commercial sex and that he was aware that several of his colleagues procured commercial sex, yet he did not timely report this information to the FBI. In addition, [REDACTED] failed to report that [REDACTED] provided him with a package containing approximately 100 white pills that [REDACTED] was to deliver to [REDACTED]. This conduct occurred in [REDACTED] when [REDACTED] and [REDACTED] worked together [REDACTED].

b6 Per FBI and OIG
b7C Per FBI and OIG

The OIG investigation substantiated the allegations that [REDACTED] solicited commercial sex. The OIG concluded that [REDACTED] violated the AG Memo Prohibiting Prostitution by allowing a prostitute to sleep in his hotel room and paying her following an outing to the karaoke bar [REDACTED]. We further concluded that [REDACTED] violated FBI Offense Code 2.6, Lack of Candor/Lying – Under Oath, and FBI Offense Code 2.5, Lack of Candor/Lying – No Oath, by lying about this incident during his [REDACTED] OIG compelled interview and his [REDACTED] compelled polygraph examination, respectively. This outing occurred while [REDACTED] was attending [REDACTED]. We credited [REDACTED] testimony regarding this event for the reasons stated in the beginning of this conclusion. We did not credit [REDACTED] conflicting testimony that the woman left his hotel room after using the bathroom and that he did not pay her. [REDACTED] had a motivation to conceal his own misconduct and the misconduct of his colleagues. Moreover, the [REDACTED] OIG compelled polygraph examination indicated deception in [REDACTED] responses to questions concerning his interactions with prostitutes, made payments to prostitutes, and allowed a prostitute to sleep in his room during [REDACTED]. The OIG further concluded that [REDACTED] violated FBI Offense Code 5.8, Failure to Report – Criminal/Serious, and FBI Policy Directive 0796D – Reporting FBI Employee Misconduct, when he failed to report this incident to the FBI.

b6 Per FBI and OIG
b7C Per FBI and OIG

The OIG investigation also concluded that [REDACTED] violated FBI Offense Code 5.7, Failure to Report – Administrative, and FBI Policy Directive 0535D – Unofficial Contacts and Reporting Requirements, which requires all FBI personnel to report unofficial contacts, including intimate contacts, with foreign nationals within five business days. During [REDACTED] OIG compelled interview, [REDACTED] admitted having an unreported intimate relationship with a [REDACTED] national whom he met at a bar between the end of [REDACTED]. [REDACTED] acknowledged that by not reporting the foreign contact, he was in violation of FBI policy governing such contact. On [REDACTED] was issued an OIG compelled polygraph examination. During the pre-test, [REDACTED] acknowledged having an additional intimate foreign contact that had not been previously reported to the OIG or the FBI. In addition, the analysis of [REDACTED] responses to the polygraph questions concerning whether he withheld any additional sexual contacts with foreign nationals or any additional unreported foreign contacts indicated deception. Thus, we also concluded that [REDACTED] violated FBI Offense Code 2.5, Lack of Candor/Lying – No Oath, by lying during his [REDACTED] OIG compelled polygraph examination about additional unreported foreign contacts.

b6 Per FBI and OIG
b7C Per FBI and OIG

The OIG investigation substantiated the allegations that [REDACTED] solicited, procured, and accepted commercial sex. The OIG concluded that [REDACTED] violated the AG Memo Prohibiting Prostitution and FBI Offense Code 4.6,

Indecent/Lascivious Acts, on three separate occasions. We further concluded that [redacted] violated FBI Offense Code 2.6, Lack of Candor/Lying – Under Oath, and FBI Offense Code 2.5, Lack of Candor/Lying – No Oath, by lying about each of these incidents during his [redacted] OIG compelled interview and his [redacted] compelled polygraph examination, respectively.

b6 Per FBI and OIG
b7C Per FBI and OIG

First, we concluded that [redacted] engaged in a sex act with a prostitute during [redacted] [redacted] For the reasons stated at the beginning of this conclusion, we credited [redacted] testimony that [redacted] received oral sex from a prostitute inside [redacted] We did not credit [redacted] conflicting testimony that he only received a lap dance from a woman at [redacted] that he did not engage in sex acts, and that [redacted] was extrapolating this allegation from a conversation they had in the vehicle that same night. [redacted] had a motivation to conceal his own misconduct and the misconduct of his colleagues. Moreover, the [redacted] OIG compelled polygraph examination indicated deception in [redacted] responses to questions concerning whether he engaged in sex acts with a prostitute during [redacted]

b6 Per FBI and OIG
b7C Per FBI and OIG

Second, the OIG investigation concluded that [redacted] paid for a sex act at the gentleman's club [redacted] [redacted] while he was attending [redacted] For the reasons stated at the beginning of this conclusion, we credited [redacted] testimony that [redacted] made an additional payment after taking a woman to a private room. We found that [redacted] did not embellish; rather, he caveated his testimony by stating that he had not asked [redacted] whether [redacted] had sex with the woman. We did not credit [redacted] testimony that he only received a lap dance from a woman, fondled her breasts, and kissed the back of her neck in a private room in [redacted] and that he paid [redacted] for the VIP room and not for sex acts. [redacted] had a motivation to conceal his own misconduct and the misconduct of his colleagues. Moreover, the [redacted] OIG compelled polygraph examination indicated deception in [redacted] responses to questions concerning whether he engaged in sex acts with a prostitute during the [redacted]

b6 Per FBI and OIG
b7C Per FBI and OIG

Third, we concluded that [redacted] accepted commercial sex provided by Host Law Enforcement – [redacted] Police [redacted] [redacted] The OIG did not credit [redacted] testimony that he only received a massage from a prostitute at [redacted] given that he admittedly joined the prostitute in a private room arranged by the [redacted] and the prostitute was "indicating sex." [redacted] had a motivation to conceal his own misconduct and the misconduct of his colleagues. Moreover, the [redacted] OIG compelled polygraph examination indicated deception in [redacted] responses to questions concerning whether he engaged in sex acts with a prostitute at the [redacted]

b6 Per FBI and OIG
b7C Per FBI and OIG

The OIG further concluded that [redacted] violated FBI Offense Code 5.8, Failure to Report – Criminal/Serious, and FBI Policy Directive 0796D – Reporting FBI Employee Misconduct, by failing to report the incidents described above in which he and his fellow FBI employees procured commercial sex. [redacted] not only was aware of his own misconduct, but he also acknowledged that the [redacted] handed each of his colleagues a piece of paper with numbers written on it and directed them to the hotel elevator [redacted] Based on this evidence, we found that [redacted] was aware that the [redacted] supplied prostitutes for both him and the other [redacted] and, thus, had a duty to report this information through his chain of command at the FBI. In addition, the OIG investigation concluded that [redacted] violated FBI Offense Code 5.7, Failure to Report – Administrative, and FBI Policy Directive 0535D – Unofficial Contacts and Reporting Requirements, which requires all FBI personnel to report unofficial contacts, including intimate contacts, with foreign nationals within five business days. [redacted] did not report his intimate contacts with foreign national prostitutes in connection with the incidents described above.

b6 Per FBI and OIG
b7C Per FBI and OIG

[REDACTED]

We substantiated the allegations that [REDACTED] solicited, procured, and accepted commercial sex. We concluded that [REDACTED] engaged in misconduct on several different occasions. Overall, we did not credit [REDACTED] testimony. [REDACTED] testimony was significantly undermined by the evidence that he researched how to erase an SD card the day before his scheduled appointment with the FBI to discuss his recall to the United States from [REDACTED] was being recalled by the FBI to the United States due to [REDACTED] allegations regarding [REDACTED] involvement in solicitation of prostitution and the other allegations discussed in this report. We found that this behavior showed that [REDACTED] was aware that he had engaged in wrongful conduct and was looking for a way to cover it up. In addition, [REDACTED] made several statements that were particularly incredible in light of all the other evidence. The only misconduct [REDACTED] admitted was that for which he knew the OIG had documentary evidence. Moreover, [REDACTED] had a motivation to conceal his own misconduct and the misconduct of his colleagues. Indeed, [REDACTED] denied having an intimate relationship with a foreign national and then changed his position once he consulted with his attorney, after the OIG notified him and his attorney that the OIG had evidence to the contrary.

b6 Per FBI and OIG
b7C Per FBI and OIG

The OIG investigation concluded that [REDACTED] violated the AG Memo Prohibiting Prostitution, which prohibits soliciting, procuring, or accepting commercial sex, on three separate occasions. The first two incidents, discussed below, involved [REDACTED] negotiating sex for others, which we found constituted procuring commercial sex within the meaning of the AG Memo. The third act, discussed below, involved [REDACTED] accepting commercial sex within the meaning of the AG Memo. We determined that the third act also constituted a violation of FBI Offense Code 4.6, Indecent/Lascivious Acts. We further concluded that [REDACTED] violated FBI Offense Code 2.6, Lack of Candor/Lying – Under Oath, and FBI Offense Code 2.5, Lack of Candor/Lying – No Oath, by lying about each of these incidents during his [REDACTED] OIG compelled interview and [REDACTED] OIG compelled polygraph examination, respectively. In addition, the OIG concluded that [REDACTED] violated FBI Offense Code 5.8, Failure to Report – Criminal/Serious, and FBI Policy Directive 0796D – Reporting FBI Employee Misconduct, by failing to report his and his colleagues' procurement of commercial sex. [REDACTED] was not only aware of his own misconduct but was also aware of the misconduct of [REDACTED] and the other FBI employees for whom he negotiated commercial sex.

b6 Per FBI and OIG
b7C Per FBI and OIG

First, we found that [REDACTED] negotiated sex acts for [REDACTED] and other FBI employees at the [REDACTED]. For the reasons stated at the beginning of this conclusion, we credited [REDACTED] testimony that [REDACTED] coordinated with one of the [REDACTED] police officers so that [REDACTED] could take a woman to a private room for commercial sex. We did not credit [REDACTED] conflicting testimony that he believed [REDACTED] wanted a private room to smoke a cigarette or receive a lap dance. We found [REDACTED] statement that prostitution "never crossed [his] mind" when [REDACTED] asked for a private room at [REDACTED] to be incredible in light of all of the other evidence, including the name of the bar itself. Moreover, the [REDACTED] OIG compelled polygraph examination indicated deception in [REDACTED] responses to questions concerning whether he arranged or paid for prostitutes for other FBI employees at the [REDACTED].

b6 Per FBI and OIG
b7C Per FBI and OIG

Second the OIG investigation concluded that [REDACTED] negotiated sex acts for [REDACTED] at the karaoke bar [REDACTED] during [REDACTED]. For the reasons stated at the beginning of this conclusion, we credited [REDACTED] testimony that [REDACTED] coordinated with one of the [REDACTED] police officers so that [REDACTED] could have commercial sex with the woman with whom he had been sitting. We did not credit [REDACTED] conflicting testimony that he thought [REDACTED] and the woman were going to get food from one of the food trucks parked outside [REDACTED] or smoke a cigarette. As noted above, the [REDACTED] OIG compelled polygraph examination indicated deception in [REDACTED] responses to questions concerning whether he arranged or paid for prostitutes for other FBI employees at the [REDACTED].

Third, the OIG investigation concluded that [REDACTED] accepted commercial sex paid for by [REDACTED] during the [REDACTED]. The OIG did not credit [REDACTED] testimony that he only conversed with the prostitute, given that he acknowledged that he went to a private room with the prostitute and that the prostitute said she would get paid regardless. Moreover, the [REDACTED] compelled polygraph examination indicated deception in [REDACTED] responses to questions concerning whether he engaged in sex acts with a prostitute [REDACTED].

b6 Per FBI and OIG
b7C Per FBI and OIG

The OIG investigation further concluded that [REDACTED] violated FBI Offense Code 5.7, Failure to Report - Administrative, and FBI Policy Directive 0535D - Unofficial Contacts and Reporting Requirements. First, [REDACTED] failed to report his intimate contact with a foreign national prostitute at the [REDACTED]. In addition, [REDACTED] failed to report a financial relationship with a [REDACTED] national, known only by her nickname [REDACTED] that occurred around [REDACTED] while [REDACTED]. After being confronted with text messages recovered from his FBI-issued cell phone, [REDACTED] admitted he met [REDACTED] while she was working at the bar [REDACTED]. FBI Policy Directive 0535D - Unofficial Contacts and Reporting Requirements, states that all FBI personnel must report unofficial contacts with foreign nationals within five business days. Unofficial contacts include "ongoing...relationships" and "voluntary associations." We concluded that [REDACTED] relationship with [REDACTED] was both ongoing and voluntary and, thus, should have been reported.

b6 Per FBI and OIG b7C
Per FBI and OIG

The OIG investigation further concluded that [REDACTED] violated FBI Offense Code 5.7, Failure to Report - Administrative, and FBI Policy Directive 0535D - Unofficial Contacts and Reporting Requirements, when he failed to report an intimate relationship with a [REDACTED] national, known only by her nickname [REDACTED] that occurred between [REDACTED] while [REDACTED]. FBI Policy Directive 0535D requires all FBI personnel to report unofficial contacts, including intimate contacts, with foreign nationals within five business days. [REDACTED] acknowledged that he violated FBI policy by not disclosing his sexual relationship with [REDACTED].

Finally, the OIG concluded that [REDACTED] violated FBI Offense Code 2.5, Lack of Candor/Lying - No Oath, by lying during the [REDACTED] OIG compelled polygraph examination about his unreported contacts with foreign nationals.

b6 Per FBI and OIG
b7C Per FBI and OIG

However, the OIG investigation concluded that [REDACTED] violated the AG Memo Prohibiting Prostitution and FBI Offense Code 5.23, Violation of Miscellaneous Rules/Regulations, by failing to report suspected violations of the AG Memo Prohibiting Prostitution by [REDACTED] and [REDACTED]. The AG Memo prohibits soliciting, procuring, or accepting commercial sex at all times regardless of whether the activity is legal or tolerated in a particular jurisdiction. The AG Memo further states that "supervisors and managers are subject to discipline for failing to report suspected violations," and that "suspected violations by Department employees must be immediately

b6 Per FBI and OIG
b7C Per FBI and OIG

reported to the internal affairs personnel of the relevant component's headquarters.... Allegations determined to be non-frivolous must also be reported to the component's security personnel." [REDACTED]

[REDACTED] told the OIG that the [REDACTED]

[REDACTED] acknowledged that [REDACTED]

[REDACTED] further acknowledged that, [REDACTED]

[REDACTED] told the OIG [REDACTED]

[REDACTED] also said [REDACTED]

[REDACTED] told the

OIG [REDACTED] Under these facts, the preponderant evidence is that [REDACTED] suspected or was willfully blind to the likelihood that [REDACTED] and [REDACTED] had violated the AG Memo by accepting commercial sex [REDACTED] were all senior officials who managed other employees. Regardless of whether they actually engaged in sex acts with prostitutes, each [REDACTED] after being supplied with alcohol, went into a hotel room that was designated by the [REDACTED] and supplied with a prostitute. As [REDACTED] especially ones [REDACTED] each should have been aware of the ways in which the solicitation of prostitution threatens the core mission of the DOJ, regardless of whether prostitution is legal or tolerated in a particular jurisdiction. As the AG Memo explains, the solicitation of prostitution not only "invites extortion, blackmail, and leaks of sensitive or classified information," but also undermines DOJ's efforts to combat human trafficking by "creating a greater demand for human trafficking victims and a consequent increase in the number of minor and adult persons trafficked into commercial sex slavery." Each [REDACTED] had a duty to report to the appropriate FBI official or supervisor, in a timely manner, that Host Law Enforcement had provided them with prostitutes.

b6 Per FBI and OIG
b7C Per FBI and OIG

The OIG investigation substantiated the allegations that [REDACTED] procured, solicited, and accepted commercial sex. The OIG concluded that [REDACTED] violated FBI Offense Code 4.6, Indecent/Lascivious Acts, by engaging in a sex act with a prostitute at the [REDACTED] massage parlor [REDACTED] The OIG investigation further concluded that [REDACTED] violated FBI Offense Code 2.6, Lack of Candor/Lying - Under Oath, and FBI Offense Code 2.5, Lack of Candor/Lying - No Oath, when he lied about this incident during his [REDACTED] OIG compelled interview and [REDACTED] compelled polygraph examination, respectively. We credited [REDACTED] testimony that prior to going to [REDACTED] he and [REDACTED] discussed the "girls" and "extra services" one could receive and that it was clear to both him and [REDACTED] that sex was "for sale" at [REDACTED] and that was the reason for their visit to the establishment. We did not credit [REDACTED] conflicting testimony that he only received a massage during his visits to [REDACTED] and did not engage in sex acts. [REDACTED] called [REDACTED] years later to tell him that [REDACTED] had closed, indicating that he and [REDACTED] had experienced something memorable there. In addition, [REDACTED] had a motivation to conceal his own misconduct. Moreover, the [REDACTED] OIG compelled polygraph examination indicated deception in [REDACTED] responses to questions concerning whether he engaged in sex acts with prostitutes at the [REDACTED] massage parlor [REDACTED]

b6 Per FBI and OIG
b7C Per FBI and OIG

In addition, the OIG investigation concluded that [REDACTED] violated FBI Offense Code 4.6, Indecent/Lascivious Acts, 18 U.S.C. § 1001, FBI Offense Code 2.6, Lack of Candor/Lying - Under Oath, and FBI Offense Code 2.5, Lack of Candor/Lying - No Oath, by engaging in a sex act with a prostitute at the [REDACTED] and then lying about it during his [REDACTED] OIG compelled interview and [REDACTED] OIG compelled polygraph examination. We credited [REDACTED] testimony that he, [REDACTED] and two women from a karaoke bar went to [REDACTED] hotel room at the [REDACTED] and that he and [REDACTED] each had sex with the respective women from the bar. [REDACTED] testimony implicated not only [REDACTED] but also himself, which we found lent credibility to his testimony. [REDACTED] testimony also was consistent with [REDACTED] testimony that [REDACTED] had told him that [REDACTED] and [REDACTED]

solicited prostitutes together in the [REDACTED]. On the other hand, we did not credit [REDACTED] conflicting testimony that he "barely knew" [REDACTED] and that he never solicited a prostitute in [REDACTED] company. [REDACTED] had a motivation to conceal his own misconduct and the misconduct of his colleague, and his testimony was inconsistent with that of two other witnesses. Indeed, [REDACTED] testimony was directly contradicted by [REDACTED] who testified that he was in the same room as [REDACTED] when [REDACTED] and [REDACTED] both engaged in sex acts with prostitutes. Moreover, the [REDACTED] OIG compelled polygraph examination indicated deception in [REDACTED] responses to questions concerning whether he engaged in sex acts with prostitutes in [REDACTED] in the company of [REDACTED].

b6 Per FBI and OIG
b7C Per FBI and OIG

The OIG concluded that [REDACTED] violated FBI Offense Code 5.8, Failure to Report – Criminal/Serious, and FBI Policy Directive 0796D – Reporting FBI Employee Misconduct, by failing to report his own misconduct and the misconduct of fellow FBI employees in procuring commercial sex. The OIG concluded that [REDACTED] not only was aware of his own misconduct, but also was aware that [REDACTED] and [REDACTED] engaged in commercial sex. [REDACTED] testified that he and [REDACTED] discussed in advance that their purpose for going to [REDACTED] was to procure commercial sex. In addition, [REDACTED] testified that he and [REDACTED] had sex with prostitutes in the same room as each other.

b6 Per FBI and OIG
b7C Per FBI and OIG

The OIG investigation further concluded that [REDACTED] violated FBI Offense Code 5.7, Failure to Report – Administrative, and FBI Policy Directive 0535D – Unofficial Contacts and Reporting Requirements. First [REDACTED] failed to report his intimate contact with the foreign national prostitutes described above. In addition, [REDACTED] admitted having unreported foreign contact with approximately 10-20 [REDACTED] women and sexual contact with more than half of them. FBI Policy Directive 0535D requires all FBI personnel to report unofficial contacts, including intimate contacts, with foreign nationals within five business days. The OIG investigation further concluded that [REDACTED] violated FBI Offense Code 2.5, Lack of Candor/Lying – No Oath, during an [REDACTED] interview with the Office of the Security Division (SecD), Analysis and Investigations Unit, FBI. During this interview, [REDACTED] stated, contrary to his admission during his OIG compelled polygraph examination, that he had sexual relations with only two specific foreign nationals while in [REDACTED] and other countries in the region [REDACTED].

b6 Per FBI and OIG
b7C Per FBI and OIG

Finally, the OIG investigation concluded that [REDACTED] violated FBI Offense Code 2.6, Lack of Candor/Lying – Under Oath, by lying during a [REDACTED] OIG compelled interview about a package he had asked [REDACTED] to deliver in [REDACTED]. We based this conclusion on our assessment that [REDACTED] provided multiple conflicting accounts concerning his knowledge of the contents of the package he gave to [REDACTED] in [REDACTED]. In addition, we found [REDACTED] explanation that he "misspoke" when he originally stated that he observed [REDACTED].

[REDACTED] We credited [REDACTED] description of the contents of the packages because in providing this description he implicated himself and, thus, did not have a motivation to lie. In addition, on [REDACTED] underwent an OIG compelled polygraph examination which indicated deception in [REDACTED] answers to questions concerning his knowledge of the contents of the package.

b6 Per FBI and OIG
b7C Per FBI and OIG

The OIG investigation substantiated the allegations that [REDACTED] solicited, procured, and accepted commercial sex. The OIG concluded that [REDACTED] violated FBI Offense Code 4.6, Indecent/Lascivious Acts, when he admittedly procured commercial sex between [REDACTED]. [REDACTED] admitted that he, [REDACTED] and two women from a karaoke bar went to [REDACTED] hotel room at the [REDACTED] and that he and [REDACTED] each had sex with the respective women from the bar. Additionally, [REDACTED] stated that on a later date without [REDACTED] he had sex with two additional women that he met at the same bar. [REDACTED] initially denied that he paid for these sexual encounters. However, after being told that an analysis of his compelled polygraph examination indicated deception, [REDACTED] admitted that between [REDACTED], he paid women for sex. We further concluded that [REDACTED] violated 18 U.S.C. § 1001 and FBI Offense Code 2.6, Lack of Candor/Lying – Under Oath, when he admittedly lied about such conduct during his

[REDACTED] OIG compelled interview. In addition, the OIG concluded that [REDACTED] violated FBI Offense Code 5.8, Failure to Report – Criminal/Serious, and FBI Policy Directive 0796D – Reporting FBI Employee Misconduct, by failing to report his own and [REDACTED] misconduct in procuring commercial sex.

b6 Per FBI and OIG
b7C Per FBI and OIG

