



VIOLATION OF CORPORATE POLICY BY AMTRAK MANAGER
DECEMBER 6, 2016
CASE OIG-I-2017-501

In October 2015, we received an allegation that an Amtrak Manager failed to inform management that he owned shares of stock in a company with whom Amtrak was doing business, and reportedly participated in the Amtrak procurement process with that vendor.

We found that the Manager failed to disclose stock ownership in the company on Amtrak's annual Certificate of Compliance forms or to his supervisor. The Manager also failed to notify Procurement of his stock ownership while he was participating in the contracting process and never sought the advice of the Amtrak's Ethics Officer. The Manager only reported his stock ownership when directly asked by Amtrak Procurement officials. Additionally, we found that following his acknowledgment of stock ownership, the Manager continued his involvement with the contract while retaining his stock shares in the vendor company.

In response to our Report of Investigation, Amtrak Management agreed that the Manager violated company policy regarding failure to disclose stock ownership at the time of hire. The company issued a formal counseling letter to the employee, which included a final warning regarding additional misconduct. In addition, the Manager informed his supervisor that he sold his stock interest.