



OFFICE OF  
**INSPECTOR GENERAL**  
U.S. DEPARTMENT OF THE INTERIOR

# **Investigative Operations of the Office of the Special Inspector General for the Troubled Asset Relief Program**

**Conducted Remotely by the  
U.S. Department of the Interior  
Office of Inspector General  
1849 C Street, NW  
Washington, DC 20240**

## **Review Team:**

**Ronald D. Malfi, Special Agent  
William Wiser, Special Agent  
Susan Hatton, Program Analyst**

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March 13, 2024

Melissa Bruce  
Principal Deputy Special Inspector General  
Performing the Duties of the Special Inspector General  
Office of the Special Inspector General for the Troubled Asset Relief Program

Subject: Report – *Qualitative Assessment Review of the Investigative Operations of the Office of the Special Inspector General for the Troubled Asset Relief Program*

Dear Ms. Bruce:

We have reviewed the system of internal safeguards and management procedures for the investigative operations of the Office of the Special Inspector General for the Troubled Asset Relief Program (SIGTARP). Our review was conducted in conformity with the *Quality Standards for Investigations* and the *Qualitative Assessment Review Guidelines* established by the Council of the Inspectors General on Integrity and Efficiency (CIGIE).

We reviewed compliance with SIGTARP's system of internal policies and procedures to the extent we considered appropriate. Additionally, we sampled 20 case files for investigations closed between August 2022 and August 2023. Since SIGTARP no longer maintains physical offices, we conducted this review remotely.

In performing our review, we also considered to the *Attorney General's Guidelines for Office of Inspectors General with Statutory Law Enforcement Authority* and Section 6(e) of the Inspector General Act of 1978, as amended. Those documents authorize law enforcement powers for eligible personnel of each of the various Offices of Inspectors General. Law enforcement powers may be exercised only for activities authorized by the Inspector General Act or other statutes or as expressly authorized by the Attorney General.

In our opinion, the system of internal safeguards and management procedures for the investigative function of SIGTARP in effect for the year ended 2023 is in compliance with the quality standards established by CIGIE and the other applicable guidelines and statutes cited above. These safeguards and procedures provide reasonable assurance of conforming with professional standards in the planning, execution, and reporting of SIGTARP's investigations.

Sincerely,

Mark Lee Greenblatt  
Inspector General  
U.S. Department of the Interior

## **EXHIBIT A. OBJECTIVE, SCOPE, AND METHODOLOGY**

The objective of our Qualitative Assessment Review was to determine whether the Office of the Special Inspector General for the Troubled Asset Relief Program (SIGTARP) had internal control systems in place that provided reasonable assurance that SIGTARP followed professional standards when conducting investigations. The professional standards were the Council of the Inspectors General on Integrity and Efficiency (CIGIE) *Quality Standards for Investigations* and the *Attorney General Guidelines for Offices of Inspector General with Statutory Law Enforcement Authority*.

We performed the review in accordance with the CIGIE *Qualitative Assessment Review Guidelines for Federal Offices of Inspectors General*. We used the questionnaires and checklists attached to these review guidelines. We analyzed existing policies and procedures; spoke with staff; reviewed closed investigative case files; and tested compliance with SIGTARP's internal control systems to the extent we considered appropriate. We conducted the review in January and February 2024.

Given SIGTARP's imminent sunset in March 2024, the timeframe and scope of this review were truncated. Specifically, we reviewed the following items from the CIGIE *Qualitative Assessment Review Guidelines for Federal Offices of Inspectors General*:

- Appendix B-1: "Assessment of Law Enforcement Powers of Implementation"
  - I.C.7.a-d – Did the Office of Inspector General (OIG) consult with the FBI, an appropriate U.S. Attorney's Office (or U.S. Department of Justice (DOJ) Criminal Division litigating component), and/or other appropriate agency (such as the CIGIE Undercover Review Committee) as required?
  - I.D.8 – Did the OIG promptly (within 30 calendar days) notify the Federal Bureau of Investigation in areas of concurrent jurisdiction in all matters involving fraud against the Federal Government when there were reasonable grounds to believe there has been a violation of Federal criminal law and the OIG initiated a criminal investigation in accordance with its policy?
  - I.D.10 – Did the OIG follow DOJ's guidelines for press releases, when required?
  - III.22 – Does the OIG's policy establish the criteria and procedures for the deactivation of Confidential Informants?
  - IV.23-35 – Adherence to CIGIE Guidelines on Undercover Operations (if applicable during review period).
- Appendix C-1: "Assessment of Compliance with the CIGIE Quality Standards for Investigations"

- C.14 – Has the organization issued a weapon to an individual not eligible to carry one, pursuant to the Lautenberg Amendment or other relevant Federal statutes restricting the carrying of firearms?
- C.18 – Does the organization properly receive, identify, store, and preserve evidence?
- C.19 – Does the organization adequately secure, store, and dispose of Federal Grand Jury information consistent with Rule 6(e) of the Federal Criminal Rules of Evidence?
- C.20 – Does the organization periodically inventory law enforcement or investigations-related accountable property such as credentials, specialized technical monitoring equipment, firearms and related equipment, and similar items?
- D.43 – Do the investigative case files reflect the file management described in the Quality Standards?
- Appendix D-1: “CIGIE Investigations Qualitative Assessment Review: Individual Closed Case Review Checklist”

## **EXHIBIT B. Listing of Sampled Closed Investigative Files**

We randomly selected and reviewed the following 20 investigative files that were closed between August 2022, and August 2023.

I-AT-19-015	I-DC-22-008	I-LA-22-006	I-SF-21-010
I-DC-12-013	I-DC-16-009	I-LA-22-011	I-SF-20-030
I-DC-21-015	I-LA-20-003	I-LA-21-026	I-SF-21-020
I-DC-22-010	I-LA-22-012	I-LA-21-023	I-SF-20-029
I-DC-19-004	I-LA-21-027	I-NY-15-018	I-SF-21-005

### **Digital Forensics Program**

SIGTARP did not have a digital forensics program to be reviewed.