



**U.S. Immigration
and Customs
Enforcement**

April 1, 2016

Ms. Carolyn N. Lerner
Special Counsel
U.S. Office of Special Counsel
1730 M Street, N.W., Suite 300
Washington, D.C. 20036-4505

Re: OSC File No. DI-14-2972

Dear Ms. Lerner:

In accordance with Title 5, United States Code (USC), section 1213(c) and (d), the enclosed report is submitted in response to your referral of allegations that an employee of the Department of Homeland Security (DHS), U.S. Immigration and Customs Enforcement (ICE), Office of Enforcement and Removal Operations (ERO), Portland, Oregon, engaged in conduct that may constitute violations of law, rule, or regulation; gross mismanagement; a gross waste of funds; or an abuse of authority. Specifically, the Office of Special Counsel (OSC) received allegations from Supervisory Detention and Deportation Officer Johnathan Kohlman that Assistant Field Office Director David Draisin: (1) falsifies his time and attendance records by claiming he is working when he is not in the office and cannot be reached on his government-issued cellphone and (2) claims administratively uncontrollable overtime (AUO) on a daily basis for hours he does not work, is unreachable, and is not performing duties that qualify for AUO. At the OSC's request, ICE's Office of Professional Responsibility (OPR) conducted an investigation into the allegations. The allegations listed above were substantiated by OPR. As noted in the report, the matter will be referred to ERO management for a determination on possible disciplinary action.

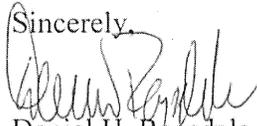
ICE has enclosed two versions of its report along with a plan of action as a result of the investigatory findings. The first version of the report contains the names and positions of ICE law enforcement officers and is For Official Use Only (FOUO), as specified by Title 5, USC, Section 1213(e). Each page of the report has been marked accordingly. We understand that, as required by law, you will provide a copy of the unredacted version of the report to the President of the United States and the appropriate oversight committees in the Senate and House of Representatives for their review. In these legally required re-disclosures of the unredacted report, ICE respectfully requests that OSC retain ICE's FOUO markings and convey the sensitivities of the identifiable information contained in the report.

The second version of the report has been redacted to eliminate references to privacy-protected information and is suitable for release in accordance with the Freedom of Information Act

For Official Use Only (FOUO)

(FOIA). 5 USC Section 552. ICE has redacted the names and positions of law enforcement officers pursuant to FOIA exemptions (b)(6) and (b)(7)(C) because the release of this information would constitute a clearly unwarranted invasion of the law enforcement officers' personal privacy. Accordingly, these exemptions are specifically asserted to protect ICE's law enforcement officers from possible acts of threat, coercion, and bribery. ICE requests that only the redacted version of the report be made available on your website and in your public library, or in any other forum in which it will be accessible to persons not expressly entitled by law to a copy of the unredacted report.

Please do not hesitate to contact my office at (202) 732-3000 should you require any further information regarding these matters.

Sincerely,

Daniel H. Ragsdale
Deputy Director

Enclosure

cc: Chief Human Capital Officer
Principal Deputy General Counsel

I. **Summary of the Information With Respect to Which the Office of Professional Responsibility (OPR) Investigation Was Initiated**

In or around the summer of 2014, Supervisory Detention and Deportation Officer (SDDO) [REDACTED], Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO), Portland, Oregon made the following whistleblower disclosures to the U.S. Office of Special Counsel (OSC) against [REDACTED], ERO/Portland:

Allegation 1: [REDACTED] falsifies his time and attendance records by claiming he is working when he is not.

Allegation 2: [REDACTED] falsifies his administratively uncontrollable overtime (AUO)¹ by claiming hours he does not work and/or is performing duties that do not qualify for AUO.

SDDO [REDACTED] more specifically alleges [REDACTED] claims to work hours when he is not present in the office and is unreachable on his government-issued cell phone. According to him, there have been numerous occasions since his arrival in 2010 when supervisors under [REDACTED] command have been unable to locate him when he is needed to perform work duties. Furthermore, [REDACTED] rarely informs his subordinates of his whereabouts and often fails to assign an acting supervisor in his absence to perform basic work functions such as approving time and attendance. SDDO [REDACTED] further claims [REDACTED] is regularly only in the office for a few hours a day or sometimes never shows up at the office while still claiming to have worked a full day on his time and attendance.

In addition to failing to work his assigned duty hours, SDDO [REDACTED] alleges [REDACTED] routinely claims to work hours beyond his regular shift in order to collect AUO. SDDO [REDACTED] contends [REDACTED] is in a supervisory position with primarily controllable, administrative duties with little opportunity for AUO. He is not a law enforcement officer in the field, which would more regularly justify AUO.

On November 20, 2015, the OSC provided a letter to the Secretary of the Department of Homeland Security (DHS) Jeh Johnson referring the above-referenced allegations to ICE for investigation and further requesting a report of findings within sixty (60) days. In early December 2015, the investigation was assigned to Senior Special Agent (SSA) [REDACTED] with OPR/Seattle. OPR received an extension through March 21, 2016 to complete the investigation.

II. **Investigation Conducted by OPR**

OPR reviewed the allegations made to the OSC and conducted interviews of ERO employees who had in the past few years or currently have direct contact with [REDACTED] and thus could provide detail regarding his regular work schedule. The interviews focused not only on [REDACTED] whereabouts during a typical work day to include arrival and departure times, tasks performed at the office, and tasks performed outside the office but also the general culture of ERO Portland office. OPR interviewed the following individuals:

¹ AUO is a premium paid to employees in positions where the hours of duty cannot be controlled administratively and which require substantial amounts of irregular or occasional overtime work, with the employee being responsible for recognizing circumstances which require the employee to remain on duty (5 CFR § 550.151).

Field Office Director (FOD) [REDACTED]
Deputy Field Office Director (DFOD) [REDACTED]
DFOD [REDACTED]
AFOD [REDACTED]
SDDO [REDACTED]
ERA [REDACTED]

In addition to interviews, SSA [REDACTED] reviewed certified Time and Attendance (hereinafter referred to as “WebTA”) records and, where available, AUO worksheets (hereinafter referred to as “AUO reports”) for [REDACTED] from October 6, 2013 through December 31, 2015 (a total of 59 pay periods).² ICE employees, including ERO, validate hours worked in WebTA, including AUO hours. However, WebTA does not permit employees to enter AUO justifications, as those are submitted separately on AUO forms. To the extent possible, OPR compared AUO hours approved on the AUO forms with hours actually claimed in WebTA to verify consistent reporting. Justifications on the AUO forms were also reviewed for sufficiency.³

OPR also analyzed PIV card reader records from October 15, 2013 to December 31, 2015 for [REDACTED]. Each individually assigned PIV card has a microchip that records a date, time, and location when used to open a gate or doorway upon entering or exiting the various thoroughfares at the ERO Portland office.⁴ SSA [REDACTED] input the data provided into a spreadsheet in order to cross-reference WebTA submissions of work hours and AUO for [REDACTED] with actual comings and goings.

As AUO is granted as a percentage of regular base salary from 10% to 25% depending on the number of hours worked, OPR also reviewed [REDACTED] employee records to determine the percentage of AUO he was receiving during the time period in question. AUO is analyzed several times per calendar year and adjusted according to an average of the number of hours worked during the assessment period. For instance, an employee must average more than 18 hours of AUO per two-week pay period to justify collecting a 25% increase in base salary.

III. Summary of Evidence Obtained from the OPR Investigation

OPR conducted the majority of interviews during the week of January 11-15, 2016 while in Portland. The first subsections below are summaries of the pertinent information provided to OPR during those employee interviews. The remaining subsections discuss the analysis of electronic and documentary evidence relative to [REDACTED] work hours.

² SSA [REDACTED] chose to start in October 2013 not only for a sufficient sample size but also as that time corresponded with PIV card records for the Portland office. ERO moved into the building in or around October 15, 2013 and that is the first time for which PIV readings are available.

³ AUO justifications must be compelling and inherently related to the continuance of one’s duties such that a failure to carry on would constitute negligence, as stated in 5 C.F.R. § 550.153(c)(2).

⁴ Employees may also gain access to the building with the use of a universal key; however, an alarm is sounded on most hallway doors when the key is used instead of a PIV card. Though the alarms do not trigger a monitoring service, they are loud enough to be heard from some distance away.

A. Interview of whistleblower SDDO [REDACTED]

As he was willing for his identity to be revealed, whistleblower SDDO [REDACTED] was interviewed first in Portland on Tuesday January 12, 2016. SDDO [REDACTED] is one of the supervisors in charge of the Criminal Alien Program (CAP) in Portland and first arrived in the office in June 2009 approximately one year before [REDACTED]. At the time of his interview, SDDO [REDACTED] was an acting AFOD for the office.

SDDO [REDACTED] stated he first noticed [REDACTED] was not in the office much in 2010 but did not think much of it, as he was not in his chain of command. He added it was noticeable because [REDACTED] office was prominent in the old field office and the lights were often out during the work day.⁵ SDDO [REDACTED] also explained as an [REDACTED] he is rarely called out of the office for meetings. He added he believes [REDACTED] should be in the office most of the day to sign documents when needed and perform other basic duties as required.

SDDO [REDACTED] said his core hours are from 6:00 am to 2:00 pm, while he believed [REDACTED] core hours to be from 8:30 am to 4:30 pm. SDDO [REDACTED] acknowledged he does not have direct knowledge whether or not [REDACTED] regularly stays late, as he is not in the office at that time. However, he added that given [REDACTED] reputation, he doubted he was.

In the spring of 2012 while [REDACTED] was running the entire Portland office when then [REDACTED] [REDACTED] was on TDY in headquarters, SDDO [REDACTED] said he noticed [REDACTED] was frequently absent when needed to sign documentation. For instance, according to SDDO [REDACTED], [REDACTED] are required to sign field operation worksheets (FOWs), also known as target folders, before investigations can begin on specific individuals. SDDO [REDACTED] added he signed a couple that morning as [REDACTED] and usually does so every day. He further said [REDACTED] would direct subordinates to put the FOWs into a three-ring binder in his office instead of signing them because he claimed his signature was not required.

Additionally, SDDO [REDACTED] claimed [REDACTED] would regularly claim to be in the office despite the fact his office light was out and car was not in the garage.⁶ According to SDDO [REDACTED], [REDACTED] would get angry when anyone would sign paperwork because he could not be located. SDDO [REDACTED] said [REDACTED] refused to allow anyone to sign paperwork for him unless specifically designated by him as [REDACTED], which he often failed to do during his regular absences. SDDO [REDACTED] stated [REDACTED] was often not around to do the basic elements of his job like signing files, performance reviews, and approving work hours, travel and leave. Instead, [REDACTED] would focus his efforts on experimental programs to build his portfolio.

SDDO [REDACTED] described [REDACTED] communication with his subordinates as fragmented and disjointed. He added it was often difficult to reach [REDACTED] by phone when he was not in the office. According to SDDO [REDACTED], [REDACTED] would regularly send emails or texts out saying he would be in a meeting without specifying where, which meeting, or when he would return. SDDO [REDACTED] believes [REDACTED] uses meetings as pretexts for not being in the office working. He stated

⁵ ERO moved to their current location in or around October 2013.

⁶ SDDO [REDACTED] provided emails to support his claim of at least one day in June 2012 when [REDACTED] could not be located.

██████████ likely attends some meetings, but no one in the office believes ██████████ attends that many meetings. SDDO ██████████ said it is a running joke in the office.

In February 2014, SDDO ██████████ said the SDDOs under ██████████ wanted to go directly to FOD ██████████ with their issues with ██████████; however, they decided instead to try to resolve the problems with ██████████. So, SDDOs ██████████ signed a letter dated February 10, 2014 that outlined some of their issues with ██████████. The letter mentions, among other things, ██████████ is frequently not at the office and when he is there, it is only for five or six hours. SDDO ██████████ agreed he drafted the majority of the letter.

SDDO ██████████ said they eventually had a conference call with ██████████ about the letter, but instead of speaking with them to address their issues, SDDO ██████████ said DFOD ██████████ essentially lectured them. According to SDDO ██████████, DFOD ██████████ said he had observed behavior consistent with the alleged complaints against ██████████, but the SDDOs were as much to blame for the problems as ██████████. SDDO ██████████ claimed DFOD ██████████ was complicit in the actions of ██████████ as evidenced by the fact ██████████ behavior continued unabated after the conference call. SDDO ██████████ went further indicating DFOD ██████████ continued to give ██████████ time-off and cash awards despite his frequent absences.⁷

He relayed a story he heard from DFOD ██████████ about ██████████ claimed AUO. According to SDDO ██████████, DFOD ██████████ then an AFOD, went to DFOD ██████████ with concerns about the hours ██████████ was claiming to have worked. SDDO ██████████ said DFOD ██████████ told DFOD ██████████ she did not believe ██████████ was working the hours he claimed. Apparently, DFOD ██████████ response was ██████████ is a "headquarters guy" and to some extent he is above the regulations.

Additionally, SDDO ██████████ talked about statements made by DFOD ██████████ in the past saying he did not know whether ██████████ was home sleeping, out shopping, or working. According to SDDO ██████████, DFOD ██████████ also asked SDDO ██████████ to check to see if his car was parked in the garage, presumably because he was unable to reach ██████████.

SDDO ██████████ said the areas over which ██████████ is in control; non-detained, FUGOPS, and the satellite offices in Medford and Eugene do not justify regular AUO hours. He explained the number of arrests in the CAP Unit in Portland is significantly higher than the other program areas thereby justifying more AUO. SDDO ██████████ believes ██████████ started to more accurately report his AUO only after his reporting of work hours came into question long after everyone else in the office was complying with regulations.

SDDO ██████████ said he does not believe ██████████ has made regular visits to the satellite offices he supervises. He said SDDO Earnest told him ██████████ has only been to Medford a couple of times in the five years he has been in Portland.

SDDO ██████████ then discussed specific days that concerned him pertaining to time and attendance and AUO claims of ██████████. For instance, SDDO ██████████ was on an email chain on May 13, 2014, where ██████████ said he would be, "back in the office" after a 1:00 pm doctor appointment. SDDO ██████████ claimed ██████████ was never in the office that morning, and he stated DFOD ██████████

⁷ ██████████ received cash awards every year he has worked in Portland, including multiple awards in 2011 and 2012, totaling \$17,215. He also received four time-off awards of 24 hours each in 2010, 2013, 2014, and 2015.

would confirm that. On [REDACTED] time and attendance for May 13, 2014, he listed eight (8) hours of work and two (2) hours of AUO. SDDO [REDACTED] did concede [REDACTED] put in one (1) hour of sick leave on the previous day⁸, so [REDACTED] could have confused the days. SDDO [REDACTED] also talked about an agency head meeting in Eugene, Oregon in or around May 2015 that [REDACTED] claimed was canceled when he showed up to the office around 10:00 am. Apparently, the meeting had occurred and [REDACTED] was caught in a lie by then AFOD [REDACTED] SDDO [REDACTED] told the story as evidence of a pattern of behavior of deception on the part of [REDACTED].

SDDO [REDACTED] also showed agents an AUO analysis report of time entered by [REDACTED] during multiple pay periods in 2014.⁹ SDDO [REDACTED] stated [REDACTED] was at risk of dropping from 25% AUO down to 20% AUO after pay period 10 in 2014. The AUO report shows [REDACTED] claimed 78.5 hours of AUO the following pay period in order to bring his weekly average up to 10 hours thus maintaining 25% AUO. In order to work 78.5 hours of AUO in a pay period, one would need to work nearly sixteen (16) hour days for the entire period.¹⁰

SDDO [REDACTED] also spoke about AUO reports, which are more detailed reports of exactly what AUO was worked on a particular day. Those reports are required to be turned in every pay period. SDDO [REDACTED] stated [REDACTED] would often not submit his reports and suggested OPR speak with AFODs [REDACTED] [REDACTED] in Seattle as both were acting DFODs over [REDACTED] at various times in the past. According to him, both were frustrated [REDACTED] would often not turn in his AUO reports as required.

When asked about specific training on AUO, SDDO [REDACTED] said they were required to sign a directive about AUO as outlined in the premium pay guide. According to SDDO [REDACTED], it was made abundantly clear years earlier what did and did not qualify as AUO. He added it was definitely clear officers were never supposed to simply pencil in eight (8) hours of work time and two (2) hours of AUO per day as he believes [REDACTED] does on a regular basis. SDDO [REDACTED] stated he does not know of any other ERO employees who regularly put in two (2) hours of AUO per day, as it was stressed to the office that AUO was irregular and uncontrollable.

SDDO [REDACTED] was asked about the timing of his allegations against [REDACTED]. He said he first made the allegations to OSC around the summer of 2014 when he was removed from [REDACTED] command and returned to supervise the CAP Program. The allegations did not coincide with the announcement of the DFOD position in Portland, which occurred in the fall of 2015. SDDO [REDACTED] acknowledged he was concerned [REDACTED] might be selected for the DFOD position, but said his concerns were unrelated to the allegations he made.

After the interview, SDDO [REDACTED] provided copies of emails as further evidence of his allegations against [REDACTED]. On Friday June 15, 2012, [REDACTED] starts an email chain to then AFOD [REDACTED] asking if she asked SDDO [REDACTED] to act in her place for the day.¹¹ Apparently he went to sign a file around 4:00 pm that afternoon, but it had already been signed by SDDO [REDACTED] as an [REDACTED] [REDACTED] claimed to then AFOD [REDACTED] he was in the office and working, so it was unnecessary for

⁸ SDDO [REDACTED] showed OPR he had been given access as a supervisor to [REDACTED] time and attendance through WebTA.

⁹ This is separate from a standard AUO report form submitted by each employee every pay period. This looks at AUO reported over multiple pay periods to determine the proper level of pay for employees going forward.

¹⁰ After looking at [REDACTED] WebTA for pay period 11 in 2014, it appears the AUO pay period report of 78.5 hours may be a clerical error. [REDACTED] input only 15 hours of AUO for pay period 11 in 2014.

¹¹ This is during the time when then AFOD [REDACTED] was on detail at headquarters but had returned for a week.

SDDO [REDACTED] to sign the file. At that point, SDDOs were looped into the email chain while [REDACTED] was dropped off and SDDO [REDACTED] explained [REDACTED] was told the file was signed because he could not be located after an officer left him both a voicemail and email about the file needing signature. [REDACTED] apparently told the officer at that time he did not have his Blackberry because he was out on a run. SDDO [REDACTED] also expressed frustration [REDACTED] is never around and often unreachable.

In an email chain from November 12, 2013, [REDACTED] had not shown up at the office by 12:35 pm and his supervisors did not know his whereabouts.¹² He did not put anyone in to act in his place.

In another email on April 23, 2014, [REDACTED] asked SDDO Williams to act in his place for three days while he was out. SDDO [REDACTED] forwarded the message to SDDOs [REDACTED] saying he would be "in meetings all day, but reachable (yeah right)" since he was acting for [REDACTED]. The email was provided as anecdotal evidence supervisors working under and with [REDACTED] perceived him to be regularly unavailable and one to use meetings as a cover for not working.

On May 13, 2014 at 1:10 pm, [REDACTED] sent an email to his supervisors saying he was out at a medical appointment but would be *back* at his desk in an hour. The insinuation was he had been in the office and would return after the appointment. DFOD [REDACTED] verified [REDACTED] had not been in the office that morning.¹³

On July 29, 2015, [REDACTED] attended a social event with co-workers and SDDO [REDACTED] provided photographic evidence with EXIF data showing [REDACTED] sitting at a table at 4:44 pm with several others. [REDACTED] was in the office for six hours and five minutes (6:05) that day but claimed eight (8) hours of work and two hours of AUO.

B. Interview of DFOD [REDACTED]

DFOD [REDACTED] was interviewed on Tuesday January 12, 2016 in Portland. She stated she was recently promoted to DFOD in mid-December 2015. She had been an AFOD in Portland since she started acting in that role in 2006, and by 2007, she was a permanent AFOD. DFOD [REDACTED] started her career in Portland approximately twenty-nine (29) years ago and was in fact born and raised in Portland. DFOD [REDACTED] had run the entire Portland office until [REDACTED] arrived in 2010 and took over supervision of the non-detained unit (NDU), fugitive operations (FUGOPS), and the satellite offices in Eugene and Medford. DFOD [REDACTED] maintained control of the CAP in Portland.

DFOD [REDACTED] stated her belief that most of the job of an AFOD should be done at the field office. She was required to sign files as an AFOD daily, including administrative removal orders for the CAP Program. She also signed off on the field office worksheets (FOWs) on a daily basis. She acknowledged the CAP Program in Portland is significantly larger than those in Eugene and Medford which means she likely signed more than [REDACTED] on a regular basis. DFOD [REDACTED] said [REDACTED] had told the SDDOs, during the time she was on TDY at headquarters back in 2012, he did not need to sign FOWs. She clarified that signing FOWs is a requirement of the AFOD position and necessary before

¹² PIV records show [REDACTED] did not use his card in the office until 1:18 pm.

¹³ PIV records show [REDACTED] did not use his card in the office until 2:38 pm though he claimed eight work hours and 1.5 hours of AUO per WebTA.

investigations can begin in the field. DFOD [REDACTED] speculated [REDACTED] was signing FOWs because it is an activity that allows one to claim AUO.

In reference to [REDACTED] regular work hours, DFOD [REDACTED] stated [REDACTED] is never in the office by 8:30 am as claimed, and she generally does not see him in the office until well after 9:00 am and sometimes not until 10:00 am. DFOD [REDACTED] said [REDACTED] typically arrives well after her in the morning and leaves well before her in the afternoon. In her perception, [REDACTED] is typically in the office no more than five or six hours per day.

DFOD [REDACTED] said [REDACTED] was frequently out of the office without telling her about it when she was an AFOD. She admitted he has been better with communicating with her now that she is his boss. DFOD [REDACTED] said [REDACTED] would typically send an email to his subordinate supervisors saying he was out at a meeting without providing a time he would return. He would also apparently put in "out of office" replies without any indication of when he would return or for how long an SDDO would be acting in his place. DFOD [REDACTED] did not recall any specific instances when she unsuccessfully attempted to contact [REDACTED] during the work day, though it did occur multiple times over the years. She described him as someone difficult to reach when he is not in the office.

She also stated there were multiple times [REDACTED] gave the impression he was in the office when he was not. She recalled a specific time [REDACTED] sent an email to an administrative staffer when DFOD [REDACTED] was at the staffer's desk. In the email, [REDACTED] allegedly claimed he would be, "back in the office" after a 1:00 pm doctor appointment. DFOD [REDACTED] explained his email seemed to indicate he would return to the office when he had not been there at all that morning. She further claimed similar instances happened regularly.

When asked about knowledge of any specific meetings requiring [REDACTED] to be out of the office, DFOD [REDACTED] said she did not know what meetings he attended because he never kept her informed of his comings and goings when she was an AFOD. She later specifically mentioned [REDACTED] attends both the Clark and Washington County law enforcement council meetings. DFOD [REDACTED] added she attended one Washington County meeting years earlier and [REDACTED] arrived half an hour late. She further relayed a belief the meeting provided no information relevant to the ICE mission, so she stopped attending. They also both attend the DHS Partners meetings which take place once every couple of months.

She mentioned a specific time the previous spring when [REDACTED] told her on a Tuesday he would be at an agency head meeting in Eugene the following day. DFOD [REDACTED] said [REDACTED] arrived in the office the next morning after 10:00 am when he was supposed to be in Eugene. He told her the meeting had been canceled. The following day, Assistant Special Agent in Charge (ASAC) [REDACTED], HSI/Portland, was in her office along with [REDACTED] and the agency head meeting was mentioned because ASAC [REDACTED] had attended it. DFOD [REDACTED] said [REDACTED] immediately left her office presumably because he had been caught in a lie. She added she checked with the SDDO in Eugene who said [REDACTED] sent him a text around 8:00 am on the morning of the meeting saying he would not be attending. However, [REDACTED] still did not arrive in the Portland office until more than two hours later. DFOD [REDACTED] said she relayed the details of this to DFOD [REDACTED] in an email but does not know if any disciplinary action was ever taken.

DFOD [REDACTED] mentioned ERO received Virtual University training, were issued memoranda, and participated in teleconferences specifically outlining what is and is not appropriate to enter as AUO.

DFOD ██████ said work that was necessary to complete that day would qualify as AUO but administrative work that could be postponed to the next day would not. She added the calculation of AUO was under heightened scrutiny and supervisors are tasked with reviewing submissions of AUO to determine what does and does not qualify.

Even before receiving the AUO training in the past couple of years, DFOD ██████ said it was not common practice for employees to put in eight (8) hours of work and two (2) hours of AUO every day. It is understood by her to be irregular. She had to counsel an employee at one time to stop that practice and properly record his AUO as required. DFOD ██████ stated the new regulations made it harder to find work qualifying for AUO as upper management. Consequently, she stated she is currently receiving 15% AUO.

She speculated ██████ would not have enough qualifying work to justify 25% AUO covering the areas he does. DFOD ██████ used to run all of the operations in Oregon and acknowledged she was extremely busy then but clarified the CAP Program in Portland did and still does generate a large percentage of the work justifying AUO. According to DFOD ██████, the CAP Program in Portland is two to three times larger than the combined programs in Medford and Eugene, which ██████ supervises.

DFOD ██████ did not have specific instances of ██████ falsifying claims of AUO because she was never in a position to see his AUO reports until December 2015, as she was previously not in his chain of command. DFOD ██████ mentioned seeing one of his AUO reports when she was an acting DFOD in Seattle, and she said she gave it to DFOD ██████ stating she had an issue with it. Her issue was she did not believe ██████ worked the time he claimed. She did state ██████ is more regularly in the office now presumably because he is aware of an OPR investigation.

C. SDDO interviews

The SDDOs from the Portland area of responsibility were interviewed January 12-13, 2016, and they corroborated much of the information about ██████ provided by SDDO ██████ and DFOD ██████. Those working in the Portland office consistently stated ██████ was only in the office for five (5) to six (6) hours per day and his whereabouts were often unknown, even to his superiors. SDDO ██████ recounted he was asked by DFOD ██████ to see if ██████ car was in the parking garage presumably because he could not be located. Most SDDOs indicated ██████ is difficult to reach when out of the office, and it would often take him hours, even days, to respond to messages.

There was a belief ██████ claims to be in meetings when not working and cannot justify the number he says he attends. In support of that, SDDO ██████ indicated ██████ never shares the substance of any of his meetings with his subordinates and never asks anyone to accompany him. The two SDDOs in the satellite offices of Medford and Eugene stated they rarely see ██████ in person and only interact with him at most a couple times per week. According to SDDO ██████ ██████ only visited Medford once in an eleven (11) month period and did not spend any time with those he supervised.

Most SDDOs stated a belief the ██████ position does not warrant a large amount of AUO, which would most likely be justifiable for reviewing and signing A-files and FOWs. The consensus was an ██████ is only required to sign A-files on more complex cases and would only be needed anywhere from once (1) per month to at most five (5) times per week. SDDO ██████ stated the number of A-files ██████ are

required to sign has significantly dropped since Oregon jails stopped honoring ICE detainees. More than one SDDO stated DFOD [REDACTED] typically reviewed and signed A-files on a more consistent basis than [REDACTED]. Several SDDOs stated there were multiple occasions when signatures were needed by [REDACTED] but he could not be located requiring someone to sign in his place.

All SDDOs agreed they had received multiple trainings on what does and does not qualify as AUO, and they expressed, with only slight variation, AUO must be intermittent, mission critical work, not administrative. It was consistently stated meetings would not qualify as AUO.

The SDDOs did not have any direct knowledge of [REDACTED] inputting inaccurate WebTA or AUO reports.

D. Interviews of [REDACTED] supervisors DFOD [REDACTED] and FOD [REDACTED]

FOD [REDACTED] was interviewed on or around January 6, 2016 at her office in Seattle, Washington. She has been the FOD in Seattle since October 2010. She stated she has known [REDACTED] since August 2007. She said she meets with [REDACTED] once a month and speaks with him on the phone a couple times a week on average.

Throughout the years, FOD [REDACTED] had heard informally the SDDOs under [REDACTED] command had complaints about his whereabouts during business hours. She discussed the matter on several occasions with DFOD [REDACTED] and directed him to work with [REDACTED] on improving his communication with his subordinates.

She was unaware of any specific abuses of [REDACTED] in reporting his time and attendance though admittedly, DFOD [REDACTED] approved his WebTA submissions. She further stated it was sometimes difficult to reach [REDACTED] during the work day, but she was unaware of any specific times he claimed to be in the office but was not.

DFOD [REDACTED] was interviewed on or around January 6, 2016 at his office in Seattle. DFOD [REDACTED] has been in that position since November 2005. He has known [REDACTED] since his arrival in the Portland office and was his direct supervisor from the time of his arrival until December 13, 2015 when DFOD [REDACTED] took over. He told agents he physically meets with [REDACTED] approximately once a month and speaks with him a couple times a week. He added [REDACTED] is largely autonomous, and they communicate primarily through email.

DFOD [REDACTED] described [REDACTED] as a "headquarters guy" who did not concern himself with the minutiae of case management, being more attuned to taking meetings and discussing budget issues, policies, facilities, and networking. According to DFOD [REDACTED] he likes to be out of the office networking to "raise the prominence" of the agency among the government and law enforcement community.

He started to hear complaints from SDDOs who were having trouble finding [REDACTED] who would not make them aware when he would be out of the office and would rarely answer his cell phone. He said he often counseled [REDACTED] on improving his communication with his subordinates, which would improve for a short period of time before returning to previous poor levels.

DFOD [REDACTED] stated [REDACTED] had several personal issues requiring him to take time during the work day to resolve when he first arrived in Portland. Those issues caused him to come in late, leave

early at times, and take unscheduled leave. He added [REDACTED] has periodically asked to work from home, never for a whole day, and only on a handful of occasions throughout the years. He has granted those rare requests.

DFOD [REDACTED] was satisfied with [REDACTED] work product and stated a belief he was able to accomplish a great deal even when not in the office. DFOD [REDACTED] said he received substantive emails from [REDACTED] at all hours of the day and night, thus he believed [REDACTED] to be honest in his reporting of time and attendance even if he was not always present in the office. He was not aware of any instances when [REDACTED] claimed to be in the office but was not.

E. Interview of Subject [REDACTED]

[REDACTED] was interviewed at the ERO/Portland field office on January 14, 2016. [REDACTED] stated he is currently an [REDACTED] with ERO in Portland and has been in that position since approximately April 2010. Prior to that, he said he was a GS-15 [REDACTED] with ERO at headquarters in Washington, DC. While at headquarters, he also worked several positions within the [REDACTED].

As for his specific supervisory duties, [REDACTED] says he signs charging documents, which used to happen four to six times a week before the Oregon jails stopped accepting detainees. According to him, he now signs approximately two to four charging documents per week. [REDACTED] also stated he reviews legal sufficiency from counsel, deals with the private bar, and maintains liaisons with the Immigration Lawyers Association. [REDACTED] acknowledged DFOD [REDACTED] saw many more charging documents than he did when she was an AFOD because the CAP program in Portland was much larger. As he is needed less to sign documents, [REDACTED] said he deals with legal issues, policy issues, human resource issues, and the intern program, among other duties.

[REDACTED] also discussed regular liaison work with local councils and task forces. He told agents he is on both the Clark County and Washington County law enforcement councils, LEAH (he did not remember the specific name) in Medford, as well as the U.S. Attorney's Office agency head meetings in both Portland and Eugene. According to [REDACTED], each of these groups meets at least once a month, typically in the morning. As for task forces, [REDACTED] claimed to be on the executive board for the Metro Gangs Task Force in Portland and said he has agents assigned to or working with Multnomah County Special Investigations, Calutts (sp?) Narcotics Task Force, Medford Area Drug and Gangs, and the Interagency Narcotics Enforcement Team in Eugene. He conceded the task forces do not require monthly meetings, but he does liaise with them on a regular basis.

[REDACTED] also mentioned being part of a weekly law enforcement liaison meeting at the Portland Airport for coffee. He feels much of his job is to build the brand of ERO in the local law enforcement community because of the negative perception of immigration work. He told agents he is known by most of the police chiefs and sheriffs in and around Portland because of his liaison efforts, and it is paying dividends.

As for other less definable duties, [REDACTED] said he walks around the ERO Portland office regularly putting in "face time" with fellow employees. He also claimed to meet with each of his SDDOs in their offices a couple times a week. [REDACTED], as the GSA contact, also deals a lot with facilities issues as the ERO Portland office still has numerous issues and Medford is looking to lease a new facility. He told agents handling the facilities issues was almost a full-time job in itself when the facility first opened a

few years ago. He further stressed facilities issues still take up part of his day on a regular basis often up to and exceeding ten hours per week.

██████████ says he tries to arrive in the morning sometime between 8:30 and 9:30 am but sometimes arrives as late as 10:00 am. He added he often goes straight to meetings from home before coming to the office. ██████████ says he treats his core hours as 10:00 am to 4:00 pm though he never had any specifically assigned. He feels it is justifiable to only be in the office for those six (6) hours per day as long as he is working his eight (8) hours on either side of those times. He said he typically leaves the building anywhere from 4:00 to 7:00 pm.

At one point, ██████████ directed the conversation towards SDDO ██████████. ██████████ stated he and SDDO ██████████ do not get along professionally. In his opinion, SDDO ██████████ yelled at him and bullied him when under his supervision as SDDO of the FUGOPS program. ██████████ tried to refer SDDO ██████████ to the Employee Assistance Program (EAP), which he expressed, "went terribly." ██████████ stated SDDO ██████████ threatened to report him to the OSC and invoke whistleblower protections.

██████████ said SDDO ██████████ is a "smart guy", but he wishes he would focus more attention on his supervision rather than sabotaging him. ██████████ stated SDDO ██████████ would track his comings and goings from the office, which made for an uncomfortable environment. In his opinion, it became SDDO ██████████ mission to "assassinate" and "undermine" him. He believed there was a chance the allegations against him, which he believes were levied by SDDO ██████████ prevented him from getting the DFOD position in Portland. ██████████ further claimed SDDO ██████████ would have had to have access to ██████████ WebTA in order to make some of the allegations he believes were levied against him. ██████████ did not think SDDO ██████████ had access to such records and stated a belief SDDO ██████████ was given the information by DFOD ██████████

Agents asked ██████████ about a commonly held belief of his co-workers he is regularly not in the office for a full eight hours. ██████████ stated it may have appeared he was not in the office a lot, but he did not think people knew the work he did outside the office. He expressed he had no obligation to tell then AFOD ██████████ and her subordinates of his whereabouts. He stated he got used to how things operate at headquarters where no one questions your comings and goings; they simply expect a final work product. ██████████ believes in giving employees flexibility in their hours to work around life issues as long as the work product is there in the end. In fact, ██████████ claimed he has been told several times by DFOD ██████████ that he gets a lot accomplished and is one of DFOD ██████████ most productive ██████████s.

When confronted with the claim he is hard to reach when not in the office, ██████████ disagreed and stated he usually returns calls within ten minutes and is generally very responsive to his subordinates. As for when subordinates need him to sign documents when he is out of the office, ██████████ said he prefers to sign legal sufficiency paperwork himself but will delegate that responsibility if he is not near a computer. If it is not urgent, he will wait and review the documents upon his return. By his estimation, he has never missed a deadline for transport by failing to provide a timely signature.¹⁴

Agents also asked about communication issues raised by subordinates who expressed frustration at frequently knowing neither where ██████████ was nor when he would return. ██████████ said the

¹⁴ This assertion was directly contradicted by SDDO ██████████.

first time DFOD ██████ told him he needed to be more communicative with the supervisors under his command telling them where he would be when out of the office was only a few months ago. He added the two had a second conversation about improving communication a few weeks ago.

When asked about the February 2014 memo put forth by the four SDDOs under his command to DFOD ██████ specifically outlining their issues with ██████, he stated he was unaware of it. He initially said he did not remember if he was counseled specifically on improving communication with his subordinates back then, but then conceded he was. He claimed again he thought his counseling occurred only a few months ago despite the SDDOs meeting with DFOD ██████ having occurred at least a year and a half ago.

████████ said he currently works between six (6) and nine (9) hours of AUO a pay period. He further stated his AUO has declined recently because of changes in what is eligible for AUO. ██████ told agents his AUO level is currently at 15% and will likely drop to 10% or 0% in the future. He said his AUO dropped from 25% months earlier. He expressed a belief he needs to claim nine hours of AUO a pay period to qualify for 15% but added he does not have enough work to justify that much AUO. He does not know how the calculation of AUO works but stated it takes months to see a change in one's pay and the amount is decreased by 5% at a time except it drops from 10% to 0%.

████████ said he lives within his means and does not rely on AUO. He explained he is capped out in salary, as he used to be a GS-15 and thus loses money every pay period to the salary cap. He contends he is still above the cap at both 20% and 15% AUO.¹⁵ By his calculation, if he were to drop to 0% AUO, he would only lose 10-12% of his salary. Thus, he claimed he has no financial incentive to falsify his AUO.

████████ said everyone used to put in two (2) hours of AUO per day for any work that was in addition to the regular eight (8) hour shift. He said he had done so since he started almost twenty-four years earlier. It was his understanding AUO was entered for hours one was either working or available to work. He claimed his hours for years based on that belief. He acknowledged being very loose with his AUO. For instance, ██████ told agents he used to claim running time as AUO both pre and post-shift.

Then, according to ██████, there was a recent issue with how Customs and Border Protection officers entered AUO, which led to a more strict definition where only certain specifically delineated activities qualify. ██████ understanding is that the lion share of AUO changes have occurred in the last year, and he saw those changes as fluid rather than immediate. For instance, he said his understanding of what qualifies as AUO is different today than it was only three months ago. It was three (3) or four (4) months ago ██████ claimed to finally get a firm grasp on the accurate definition of AUO. He said AUO is now work that must be done that day and is not payable for simply being available.

As examples of what of his responsibilities qualify for AUO, ██████ said signing FOWs, reviewing case files needing immediate attention, and taking phone calls or handling communication on issues after business hours that had to be addressed immediately would all qualify. For instance, he claimed to recently deal with an issue requiring immediate attention of building leaks brought on by heavy rains for which he claimed AUO.

¹⁵ As a GS 14 step 10, ██████ base salary in 2015 was \$135,176. Thus, he would be above the salary cap making 20% AUO but would fall just below it making 15% AUO.

██████████ said the regulations on AUO are confusing even for him. He said there was one video teleconference on what qualifies as AUO, but the examples did not seem applicable to ERO work in his opinion. He further acknowledged he attended meetings and phone conferences on what qualifies as AUO but said he often left more confused than when he entered. As an example, he said pre-shift AUO used to be acceptable until recently but no longer is. He later said pre-shift AUO would be allowable in certain circumstances, such as looking for a fugitive one evening and continuing the search the following morning when learning a target will be around early.

On numerous occasions, ██████████ expressed his confusion on the rules regarding AUO and stated he often had questions for his supervisors and received conflicting responses. He also claimed to regularly get questions about AUO from his subordinates. When shown memos from July 2014 from ERO headquarters that explicitly stated what qualifies as AUO, ██████████ admitted receiving those memos but claimed there was lag time between the release of the memos and the training he received.

When asked about specific pay periods in which he put in for a substantial amount of AUO, ██████████ did not remember any. He was asked about what appeared to be an input of 78.5 hours of AUO in one pay period to bring his average up to ten (10) hours a week to maintain his 25% AUO. He immediately said that number was a mistake.

When asked about his AUO reports, ██████████ said he now submits them every pay period but does not keep copies.¹⁶ He acknowledged there were times he submitted them late, but every pay period should be accounted for. He further agreed the AUO reports were a requirement. According to him, most were submitted to DFOD ██████████ and now to DFOD ██████████. He claimed to have never falsified an AUO report.

When shown his PIV card readings for the past year, ██████████ questioned the time zone¹⁷ for the readings and the accuracy of the computer clocks. He added it was only recently the computer clocks were synced with a GPS to make them accurate. ██████████ then discussed the fact the clocks in the phones were 30 minutes off, which is unrelated to the PIV card readings.¹⁸

██████████ also said he uses his key as much or more often than his PIV card to open doorways. The hallway entry doors sound an audible alarm when opened with a key versus a PIV card that sounds until the door shuts again. In fact, the door on the second floor hallway requires a PIV card to silence the alarm.¹⁹ ██████████ claimed the alarmed doors are not connected to any alarm response service and only sound while the door is open for people nearby to observe who is making entry. ██████████ claimed he often opens the door with his key despite the alarm sounding because his card used to not work well on the doors. He further claimed the alarm was not loud and there is not anyone seated near the doors to hear him enter typically.

¹⁶ ██████████ left a voicemail on SSA ██████████ office line at 6:30 pm Thursday February 11, 2016 confirming he does not keep copies of his AUO reports. He was further unable to retrieve any from his sent emails.

¹⁷ The PIV readings are in EST zone, 3 hours ahead of Portland, OR. Though not adjusted on the Excel spreadsheet, the times are adjusted for analysis purposes.

¹⁸ Regardless of whether or not the time zone was correct, the relative time of how long ██████████ is typically in the office can be gleaned from his PIV card record.

¹⁹ ██████████ made a point of using his key in front of agents for the remainder of the time he was interviewed to move in and out of doors when he had used his PIV card before this discussion.

Agents discussed PIV card readings from 2015 for [REDACTED], which showed there were approximately fifty (50) days when he was in the office for less than four (4) hours. When asked if it would be unusual for him to declare eight (8) hours of work and two (2) hours of AUO on a day he was only in the building for four (4) hours or less, he said, "it depends." He further explained it would depend on his meetings and perhaps his former understanding of AUO. He admitted AUO he claimed last year would likely not be claimed as AUO this year.

When asked about claiming hours of AUO on days he was never in the office, [REDACTED] said there were days he worked a full shift and never came into the ERO Portland office. He said he goes to Seattle or Tacoma once or twice a month and gets down to his satellite offices, Medford and Eugene, once or twice a quarter.

[REDACTED] stated he kept a calendar on Outlook, which lists many of the meetings he attends and attended in the past. Agents asked him to produce his calendar for the previous two years, and he complied. When looking at the calendar, [REDACTED] explained some of his meetings and other obligations for the day may not have printed as there was limited space in each box, which was representative of one day. He acknowledged some of the meetings on his calendar are recurring every week or month though he does not attend every meeting listed. [REDACTED] claimed he attended most of the meetings listed on his Outlook calendar.

OPR reviewed two years (2014 and 2015) of [REDACTED] Outlook calendar. Based both on statements by [REDACTED] and the nature of a calendar in general, there is no way to tell what meetings he attended. Many of the events have overlapping times, which would make it impossible for him to attend them all. Many, if not most of the events on [REDACTED] calendar are recurring every week or month as he specified.

Agents asked [REDACTED] to provide further evidence, in the form of emails or Outlook reminders, as proof he attended the many meetings he claimed. He stated he would not voluntarily provide that information because he felt agents were trying to gather evidence against him. He ultimately reluctantly agreed to review his emails for some proof of the meetings he attended, if any were retained. All parties agreed any information he provided would not be considered the total record for meetings attended. SSA [REDACTED] never received any emails or meeting minutes from [REDACTED] regarding meetings he had attended.

[REDACTED] acknowledged he did not regularly brief his subordinates on the substance of the meetings he attends. He said he needs to do that more and expressed a desire to have subordinates attend more meetings in his place so they understand the value.

[REDACTED] told agents he is responsible for caring for his elderly grandmother and his daughter, so there are times he needs some flexibility in his work schedule to accommodate their needs. For instance, he does not have consistent day care for his daughter in the morning, so there are times he is on conference calls or responding to emails in the morning before his daughter goes to school. He said he works mornings from home a handful of times in a month but is usually at the office by 10:00 am. [REDACTED] said his supervisors are aware of his flexible schedule, and he now makes his subordinates aware of it after receiving counseling from DFOD [REDACTED]

[REDACTED] said he never intentionally falsified his time and attendance or AUO. He further stated a belief he has worked all of the hours claimed with the caveat his understanding of AUO has evolved.

When shown he claimed eight (8) work hours and two (2) AUO hours for the majority of days in 2015, up until at least October, ██████████ conceded it took a long time for it to “sink in” that he had to alter the way he input AUO. He did not have an explanation for why others in the office expressed a clear understanding of how to input AUO long before he did. When asked if he worked ten (10) hours on the days he claimed two (2) hours of AUO, ██████████ admitted he could not say that and “did not know.” He further claimed he could not recall specific dates from the previous year. ██████████ finally acknowledged he claimed eight (8) hours of work and two (2) hours of AUO on a regular basis out of habit and there were days he likely input his time incorrectly. He incorrectly thought being available for work justified AUO.

Ultimately, all parties interviewed, with the exception of ██████████, were consistent in their assessments of the amount of time he spends in the office (which was corroborated with PIV card readings discussed below) as well as in their understanding of AUO and its proper applications. Those interviewed were also believable and did not appear to have any personal or emotional motivations for statements pertaining to ██████████. ██████████, on the other hand, was inconsistent and contradictory on multiple occasions as well as being vague with provided timelines. He often minimized the scope of the allegations against him, claiming for instance AUO policy changes and concerns about his lack of communication with his employees only arose in the last couple months when they were, in fact, made clear years earlier.

F. Analysis of PIV Card Readings for ██████████ October 2013 through December 2015

SSA ██████████ reviewed PIV card readings, which showed all times ██████████ used his card to enter or exit the various thoroughfare at the ERO Portland office. The PIV card readings began on October 15, 2013 as those are the first readings from the new facility. Below is a summary of the information which was input to an Excel spreadsheet for easier manipulation and interpretation of the data.²⁰

In that time period, there were five hundred eight (508) total days during which ██████████ either claimed at least some work time on WebTA submissions or his PIV card showed he spent some time at the office. As that does include seven (7) days when his PIV card registered at the office on either a Saturday or Sunday, the total number of work days will be lowered to five hundred one (501) for analytical purposes. Of those 501 days, ██████████ claimed some form of leave (sick, annual, or comp time) on forty-nine (49) of them with an average number of leave hours per day equaling 3.8. Thus, in order to avoid skewing the statistics, SSA ██████████ eliminated days with any leave declared, which brings the total down to four hundred fifty-two (452). Of those, ██████████ never registered PIV card readings on seventy-two (72) days, bringing the total number of PIV card days analyzed down to three hundred eighty (380).

During those 380 days, ██████████ spent an average time of six hours and two minutes (6:02) in the office from the time of his first PIV card reading of the day to his last. His average arrival time in the morning for the days with PIV card readings was 10:40 am and average departure time in the evening was 4:35 pm.

However, those days include many on which his first PIV reading was not at the vehicle entry gate and his last reading of the day was not showing the exit of his vehicle at the gate. ██████████ acknowledged during his interview that days showing the entry and exit of his vehicle as the first and

²⁰ SSA ██████████ will include a copy of the Excel spreadsheet as an attachment to this report.

last PIV entries of the day would certainly be indicative of the entire time he spent at the office. There were only one hundred sixty-seven (167) days out of the 380 when he both entered and exited the vehicle gate as his first and last PIV card entries respectively. Yet, if one analyzes only those days, his average amount of time in the office increases by thirty-eight (38) minutes up to six hours and forty minutes (6:40).

That being said, most of ██████████ first PIV card readings, if not at the entry gate, show him at stairwells, elevator, or hallway lobbies around the same general time he arrives at work with the most common entry point being the 3rd floor lobby outside his office. During interviews, agents learned the entry gates are often left open during high traffic arrival and departure times in order to avoid excess wear and tear. So, it is logical the majority, if not all, of ██████████ first PIV card readings reflect entry made very near his arrival time at the office.

His last PIV card readings of the day, when not at the exit gate, consistently fall in the range between 3:00 pm and 5:00 pm suggesting the gates may often be open during those hours as stated by both ██████████ and DFOD ██████████. Generally, though not exclusively, if his PIV card was used to exit the gate at the end of the day, it was after 5:00 pm. It is unlikely ██████████ managed to stay at the office working for hours on a consistent basis after his last PIV card reading for multiple reasons. First, the consistent testimony from all managers in the Portland office was that ██████████ does not work late being in the office for only five or six hours a day. DFOD ██████████ said she regularly leaves after him. Second, he only averaged roughly a half hour more at work as discussed above when he both entered and exited the vehicle gate on a given day with his PIV card. Finally, it is simply improbable given the number of doorways that require PIV cards in the ERO Portland office one could be there for hours without another logged entry.²¹

██████████ admittedly took many different routes both in and out of the office, so OPR agents walked various routes to see if it was easy to get to the inner offices or garage without using a PIV card. It was possible to take a stairwell in the garage up and travel through unused office space to enter near the 3rd floor management offices. However, getting to the offices themselves once on the 3rd floor required a PIV card or use of a key on one occasion. Upon exit, a PIV card was generally needed to enter the garage if entering from the 1st or 2nd floors, which would likely be the most common exit path. However, if one went back through the unused office space and took the garage stairwell back down from the 3rd floor, the use of a PIV card is not required at any point. Also, one could enter the 2nd floor fitness room and exit to the garage without the use of a PIV card. It is possible that is why many of ██████████ last entries for the day show him entering either the 3rd floor offices or the 2nd floor fitness room.

G. Evidence Obtained From Days Without PIV Card Readings

As mentioned earlier, there were 72 days where ██████████ never registered a PIV card reading but declared that he worked a full day. The number of days without a PIV reading rises to ninety-four (94) if you include days when some but not a full day of leave was declared. Thus, OPR examined work that would require ██████████ to be out of the office for an entire day. ██████████ told agents he was called back to headquarters a couple of times on TDY shortly after arriving in Portland. That information was discounted as the period of time examined by OPR did not start until ██████████ had been in Portland for more than three (3) years. Next, OPR looked at time periods where ██████████ was out

²¹ Though ██████████ claimed to use his key frequently to open doors, there was no other testimony to support his claim, and OPR found his assertion lacked credibility especially given the number of doors where alarms would sound with the use of a key.

for three to five days at a time suggesting he may be at a conference or other out of town training. There were four such periods during the time examined: September 8-11, 2015, May 26-29 2015, April 20-24 2015, and April 28-30 2014. Those account for sixteen (16) days.

Recalling information learned during interviews, ██████████ claimed to visit the satellite offices of Eugene and Medford once or twice per quarter. However, SDDO ██████████ in Medford stated ██████████ had only visited once in the past eleven (11) months and no more than twice per year. SDDO ██████████ in Eugene further stated he rarely ever sees ██████████ in person. Moreover, as Eugene is only a two hour drive from Portland, it may not require a full day for an office visit. It is likely satellite office visits accounted for no more than four days per year or roughly eight or nine days during the time period examined.

██████████ claimed to attend five different monthly meetings that typically met in the mornings to include the Clark and Washington County law enforcement councils, LEAH in Medford, as well as the USAO agency head meetings in both Portland and Eugene²². Three of the five were in the local area with one each in Medford and Eugene that would require a longer drive. The local meetings would not require him to be out of the office for the whole day, while the other two might. However, given ██████████ rare visits to the Medford field office, which is at least a four-hour drive from Portland, it is not likely he attended that meeting monthly.

██████████ also stated he is on the Executive Board of a gang task force and liaises with multiple task forces. He admitted those meetings are not monthly and given their proximity to the office would not require him to be absent an entire day.

According to FOD ██████████ and DFOD ██████████ the managers in Portland travel to Seattle approximately once a month for supervisory meetings that include a working lunch. Those events likely take all day given the three-hour drive between Portland and Seattle. OPR has not been able to confirm if those meetings actually occur every month. It should be noted there were not regular monthly day-long managerial meetings listed in ██████████ Outlook calendar, which is further evidence of its limited reliability as a record of his whereabouts.

DFOD ██████████ claimed he authorized ██████████ to work from home on a handful of occasions. ██████████ also stated a need to work from home some mornings to take care of his daughter before school or to care for his elderly grandmother. Both men agreed work from home was never intended or authorized for a full day.

Giving ██████████ the benefit of the doubt and assuming he attends most of the out-of-town quarterly meetings, there are still more than three weeks' worth of work days where he was not in the office and a justification has not been provided or is not readily apparent. Emails he sent out to subordinates were vague and inconclusive. It is improbable ██████████ work duties required him to be out of the office so frequently and for the entire day.

²² In direct contradiction to his claim, when examining ██████████ calendar, the USAO meeting in Eugene is listed as a quarterly, not monthly meeting.

H. Analysis of ██████████ AUO Through Both WebTA Submissions and AUO Reports

SSA ██████ examined ██████████ declared AUO in WebTA, which he input directly on a bi-weekly basis before certifying the veracity and sending forward electronically to DFOD ██████ for approval. Separate from the WebTA transactions, ██████████ was required to prepare AUO reports each bi-weekly pay period, which provide further detail on the type of AUO worked. Those would also be submitted to DFOD ██████ for review before being stored with a timekeeper per policy. As discussed below, the limited sample size received by OPR prevented any meaningful analysis of the data. Our office received AUO reports for six (6) of the fifty-nine (59) pay periods reviewed.

1. AUO submissions via WebTA for ██████████

██████████ WebTA submissions for the 501 day period in question show an average AUO input of 1.6 hours per day. Thus, on average he claimed to work 9.6 hours a day or 9:36. During that time frame, he declared two (2) hours of AUO on two hundred seven (207) days, one and a half (1.5) hours AUO on one hundred seventy (170) days, and one (1) hour of AUO on thirty-eight (38) days. On 377 days, or roughly 75% of the time, ██████████ declared he worked either 2 or 1.5 hours of AUO.

Looking only at the days on which ██████████ first PIV card reading and last PIV card reading of the day were at the vehicle gate, he was only in the office on average for 6:40, which is almost exactly three (3) hours less than his average declared work time of 9:36. Factoring in the days when his PIV did not register at the office, but he declared he was working, there is a more than three and one half hour discrepancy (6:02 to 9:36). Thus, for his submissions to be accurate, ██████████ would have had to be out of the office working for more than three hours per day every day on average.

2. AUO reports submitted by ██████████

SSA ██████ attempted to match up ██████████ WebTA submissions with his required AUO reports to determine if the justifications were sufficient. Despite repeated requests made to at least five different individuals with ERO in both Portland and Seattle, OPR was only able to obtain six AUO reports submitted by ██████████ during the review period and those were found in old emails provided by DFOD ██████. Despite a requirement that such records be maintained, they simply were not. This is in direct contradiction to claims made by ██████████ during his interview in which he stated he was sometimes late in turning in his AUO reports but eventually turned in every single one. OPR has made an additional request of ██████████ to search sent emails for any AUO reports still in storage. ██████████ responded via phone to that request on February 18, 2016 and stated he searched his email and could not find any records of AUO reports. He further stated though the majority of reports were likely submitted via email, some were signed in person or faxed. Below is more in-depth analysis of the AUO reports OPR received.

In the AUO reports that were provided to OPR, the two (2) from 2014 (pay periods 3 and 17) listed 1.5 hours per day of AUO, which is too uniform to be considered irregular or uncontrolled suggesting his overtime was administrative in nature. The same held true on the earliest two (2) AUO reports received from 2015 (pay periods 9 and 19). There ██████████ declared two (2) hours of AUO per day worked. The AUO justifications were predominantly vague and uniform, lacking the necessary specificity to be sufficient. And, though his justifications from pay period 19 did include A-file numbers for specificity, the generic "case review and approval" term was used for most days.

██████████ also listed his work hours on the six (6) AUO reports as 8:30 am to 4:30 pm, 8:30 am to 5:00 pm, or 9:00 am to 5:00 pm. When comparing those declarations to his PIV readings, there are significant discrepancies. He was never in the office at 8:30 or even 9:00 am on most mornings and often left before 5:00 pm. Again, PIV readings are not conclusive evidence of his time in the office, but as discussed in detail above are certainly probative.

IV. Apparent or real violations of law, rule, or regulation

SSA ██████████ reviewed the various statutes, regulations, and policies within ICE specific to full-time employment and the proper application of AUO. The first subsection lists the applicable regulations and policies for reference while the second discusses how the actions of ██████████ were determined to constitute violations of those regulations and policies.

A. Relevant regulations, guidance, and policy with respect to work hours and AUO

5 Code of Federal Regulations (CFR) § 610.121, which states in relevant part, except when the head of an agency determines that the agency would be seriously handicapped in carrying out its functions or that costs would be substantially increased, he or she shall provide that; (2) the basic 40-hour workweek is scheduled on 5 days, Monday through Friday when possible; (3) the working hours in each day in the basic workweek are the same; and (4) the basic non-overtime workday may not exceed 8 hours.

5 CFR § 550.151, which states in relevant part, an agency may pay premium pay on an annual basis to an employee in a position in which the hours of duty cannot be controlled administratively and which requires substantial amounts of irregular or occasional overtime work, with the employee generally being responsible for recognizing, without supervision, circumstances which require the employee to remain on duty. Premium pay under this section is determined as an appropriate percentage, not less than 10 percent nor more than 25 percent, of the employee's rate of basic pay.

5 CFR § 550.153(c) provides further guidance indicating the words in *5 CFR § 550.151* that an employee is generally "responsible for recognizing, without supervision, circumstances which require him to remain on duty" mean that:

- (1) The responsibility for an employee remaining on duty when required by circumstances must be a definite, official, and special requirement of his position.
- (2) The employee must remain on duty not merely because it is desirable, but because of compelling reasons inherently related to continuance of his duties, and of such a nature that failure to carry on would constitute negligence.
- (3) The requirement that the employee is responsible for recognizing circumstances does not include such clear-cut instances as, for example, when an employee must continue working because a relief fails to report as scheduled.

5 CFR § 550.153(d) further defines the words "circumstances which require him to remain on duty" as used in *5 CFR § 550.151* as follows, in part:

- (1) The employee is required to continue on duty in continuation of a full daily tour of duty or that after the end of his regular workday, the employee resumes duty in accordance with a prearranged plan or an awaited event.
- (2) The employee has no choice as to when or where he may perform the work when he remains on duty in continuation of a full daily tour of duty. This differs from a situation in which an employee has the option of taking work home or doing it at the office; or doing it in continuation of his regular hours

of duty or later in the evening. It also differs from a situation in which an employee has such latitude in his working hours, as when in a travel status, that he may decide to begin work later in the morning and continue working later at night to better accomplish a given objective.

5 CFR § 550.154, states in relevant part, an agency may pay the premium pay on an annual basis to an employee who meets the requirements of that section, at one of the following percentages of the employee's rate of basic pay:

- (1) A position which requires an average of at least 3 but not more than 5 hours a week of irregular or occasional overtime work—10 percent;
- (2) A position which requires an average of over five but not more than 7 hours a week of irregular or occasional overtime work—15 percent;
- (3) A position which requires an average of over seven but not more than 9 hours a week or irregular or occasional overtime work—20 percent;
- (4) A position which requires an average of over 9 hours a week of irregular or occasional overtime work—25 percent.

Beyond statutory authority, as with some other DHS components, ICE continues to reference guidance and policies from prior agencies who administered AUO such as the Immigration and Naturalization Service (INS). The INS Administrative Manual, Section 1.3.103, defines AUO in virtually the same language as the CFR, but it goes further in providing examples of its incorrect application, which include:

1. Payment of AUO to an employee who almost always works in a supervised office environment and does not perform independent investigative or other administratively uncontrollable work;
2. Crediting of hours of work for AUO pay that are clerical or administrative in nature, can be easily scheduled in advance, and do not involve independent investigative or other administratively uncontrollable work.

In June 2007, the ICE ERO Assistant Director for Management sent a memorandum to all Field Office Directors requesting review of the general statutory and regulatory requirements pertaining to AUO to ensure its proper administration via supervisors.

On July 21, 2014, the ICE Principal Deputy Assistant Secretary issued a guidance memorandum for ICE supervisors pertaining to AUO. It served as a reminder to ICE supervisors of "their responsibility to review the accuracy of their subordinates' time and attendance records, specifically with regard to AUO." Supervisors are responsible for certifying AUO for individual employees at the appropriate percentage rate and monitoring subordinates to ensure they are performing justifiable AUO work, which is irregular and occasional. The memo further states, "AUO is not intended to address administrative or clerical duties that can easily be scheduled in advance of the administrative work week or performed during a regular shift...Where it is not operationally necessary to perform a duty outside of the employee's regular tour of duty, and the duty can be performed during the employee's next tour of duty, it cannot be used to justify AUO. " All of the examples provided of justifiable AUO involved field work typical for ERO officers.

Supervisors were further instructed to "reject those AUO records that contain insufficient justifications, and will be held responsible if they approve records that are improper. Supervisors should not approve AUO justifications that fail to sufficiently describe the bases for the overtime (i.e. vague descriptions like

“file review” or “Supervisory Detention and Deportation Officer duties”). Furthermore, supervisors are responsible for identifying employees who consistently provide justifications that appear administrative in nature or suggest a pattern of overtime performed for the purpose of accruing hours or for the benefit of the employee, rather than operational considerations. In such instances, supervisors, in consultation with the Office of Human Capital, must assess whether decertification of that employee’s AUO is necessary to remain consistent with law and regulation.”

The following day on July 22, 2014, the ICE Principal Deputy Assistant Secretary issued a guidance memorandum for ICE employees pertaining to AUO. Its purpose was to “remind ICE employees of their responsibility to submit accurate time and attendance records, and to be especially careful and attentive when claiming AUO.” The second memo had much of the same language as the one issued the previous day directed at supervisors. It reminded employees claiming irregular or occasional overtime that they, “should do so for the efficiency of the Agency, as opposed to the employees’ personal convenience or for the purpose of accruing hours.”

The above guidance and policies were pushed out to the ICE field offices through video teleconference (VTC) training to bolster all ERO employees’ understandings of proper reporting requirements. Upon receipt of said training, supervisors were expected to monitor and ensure subordinates were accurately inputting both WebTA and AUO reports. And, all employees were expected to understand their responsibilities with respect to accurate record keeping.

B. [REDACTED] violations of rule and regulation pertaining to work hours and AUO

The OPR investigation substantiated the following allegations made by the whistleblower, SDDO [REDACTED]:

Allegation 1: [REDACTED] falsifies his time and attendance records by claiming he is working when he is not.

After interviewing witnesses in this investigation, a general pattern quickly emerged with respect to subject [REDACTED] time in the ERO Portland field office. Witnesses consistently stated their belief he was only in the office four (4) to six (6) hours per day and further indicated he uses meetings as pretexts to avoid work. Indeed, [REDACTED] himself told agents he considered his core hours to be from 10:00 am to 4:00 pm, though he added he typically worked on either side of those hours. The office’s perception was bolstered by supporting evidence of PIV card readings for 59 pay periods through the end of 2015, which revealed [REDACTED] averaged just over six (6) hours per day in the office excluding the seventy-two (72) days he declared a full day of work and never registered a PIV card reading at the office.

Now this information must be counterbalanced by a couple factors weighing in [REDACTED] favor. First, it was clear from interviews he has a very different style of management from his once counterpart and now supervisor DFOD [REDACTED]. He employs a more hands-off approach preferring to spend his time in the field making connections with local law enforcement and those in the legal community to improve the reputation of ICE in the area, which was corroborated by his supervisor DFOD [REDACTED]. While [REDACTED] expressed a belief that an [REDACTED]’s job should be done primarily in the office, and, by all accounts, she spent and still spends the majority of her time there reviewing files and conducting other business. There was also admittedly some tension between the two early on probably based both on a personality conflict and joint perceptions the two were jostling for power as [REDACTED].

Second, PIV card readings are not conclusive evidence of the time ██████████ was working for the day. He recounted a need to work from home on occasion in the morning to get his daughter ready for school or at various other times to take care of his elderly grandmother. DFOD ██████████ agreed he gave ██████████ authorization to work from home a handful of times due to extenuating circumstances, though never for a full day. Also, as discussed above, his desire to increase ICE's visibility in the community meant he had to attend meetings outside the office, which he no doubt did. OPR disputes the number of meetings ██████████ claims to have attended.

Finally, in the past month or two, ██████████ has shown an increase in the amount of time spent in the office, which is confirmed by PIV records. Moreover, several witnesses said he is easier to reach and quicker to respond as of late. They expressed he is also more likely to tell subordinates of his whereabouts and to designate someone to act in his absence. This must be tempered by the possibility his increase in office visibility correlates with an awareness his behavior had been reported to OSC.

That being stated, the OPR investigation substantiated this allegation based on the overall weight of the evidence. While ██████████ certainly attended meetings outside the office, there is nothing to support the number of meetings that would require his absence for an average of three (3) to four (4) hours²³ per day. ██████████ could not provide any more than a handful of regular meetings he attended, some of which he claimed were monthly, but were in fact quarterly. He further exaggerated the number of times he visited the satellite offices over which he has supervisory control. He also failed to provide any email or other documentary proof he attended the meetings he alleged as requested by OPR. His Outlook Calendar was of very limited value as many of the entries merely repeated every week and often overlapped in time with other events making it impossible for him to have attended most meetings as claimed. Perhaps most telling was the statement by witnesses and acknowledgement by ██████████ himself that subordinates were not briefed on the substance of the meetings he asserted were important for the prestige of the office. One would think if valuable information was being shared at the various meetings, it would be pushed down the chain to subordinates for use in the field.

As for PIV card readings, though they are not conclusive evidence of his exact time in the office, they are a useful tool to help determine a pattern of behavior. ██████████ pattern of behavior for the time period analyzed was to arrive at work between 9:30 and 11:00 am and leave between 4:00 and 5:00 pm. It further appears he attempted to obscure the times he left the office by taking routes that would not leave a PIV trail, for instance through the 3rd floor unused office space and the fitness room. While this has improved recently, he is still only averaging around seven (7) hours in the office over the last few months.

Allegation 2: ██████████ falsifies his AUO by claiming hours he does not work and/or is performing duties that do not qualify for AUO.

Analysis of ██████████ WebTA submissions showed his input of AUO followed consistent patterns that were more controlled than the requisite irregularity and uncontrollability defined in the regulations. Approximately 75% of the time he claimed either two (2) hours or one and on-half (1.5) hours of AUO. There were often periods of weeks in a row where one or the other amount was claimed daily. AUO was also often input when he never showed at the office and his whereabouts were unknown or unverifiable. Those same hours of AUO were also regularly declared when he was on leave

²³ That number is obtained by subtracting his average time in the office from a standard 8 hour work day and average AUO declared

for part of the day. On those partial leave days, [REDACTED] was rarely ever in the office for even as much time necessary to complete a regular eight (8) hour work day let alone the AUO alleged.

[REDACTED] admitted it took him a while to comprehend AUO was not intended to be availability pay where it could be collected merely by having your government phone on you to respond if needed. He further acknowledged he often input two (2) hours of AUO out of habit and would declare time he now knows would not qualify for AUO, such as time running. Though he received training, likely more than a non-supervisory employee, on the proper application of AUO over the last several years, he did not have a plausible explanation why it took him longer than everyone else to understand the requirements. All other employees interviewed provided coherent and cohesive definitions of AUO and understood its proper application. Most claimed to have understood the requirements for a long time.

Several sources doubted [REDACTED] had enough work to justify his input of AUO given his areas of supervisory responsibility. In fact, he told agents he was likely to drop down to 10 or 0% AUO in the near future as the availability of qualifying work was limited. Yet, neither he nor anyone else gave an indication during the investigation that his work responsibilities have recently changed. Thus, it is fair to presume there never was sufficient work to warrant the amount of AUO [REDACTED] was claiming.

But, would the duties he did perform even qualify for AUO? OPR sought to review his justifications for sufficiency but were unable to given the lack of retained records. Aside from the obvious record-keeping violations, it is readily apparent [REDACTED] never submitted many of his required AUO reports, as was alleged by multiple sources. Though the majority were submitted via email according to [REDACTED] [REDACTED] he never retained any and his supervisor was only able to produce 6 reports. Others were apparently hand-delivered to DFOD [REDACTED] for signature or faxed, but none of those managed to make it into a file for retention. In fact no timekeepers, who would normally be tasked with maintaining such records, in either Seattle or Portland have any AUO reports from [REDACTED] other than pay period 1 in 2016 and a handful from the latter half of 2015.

OPR thus substantiates this allegation on both grounds that [REDACTED] did not work AUO hours he claimed and claimed hours for work that did not qualify for AUO.

V. Planned Action Resulting From This Investigation

ICE is committed to administering overtime pay in a manner consistent with law, regulation, and policy. Specifically, ICE has issued guidance in the form of memoranda and provided training on various platforms that explain proper AUO practices, which have been disseminated to supervisors and subordinates alike. Further, a more detailed AUO report form was developed to ensure ICE employees provide proper justifications for AUO submissions, which was mentioned in a footnote above. Not only are employees accountable for their justifications, but supervisors have been tasked with conducting thorough examinations and reviews of submitted AUO and will be held accountable for reports submitted that do not meet the requisite standards.

Further, OPR contacted the Management Inspections Unit (MIU) in ICE Headquarters to conduct an audit of all AUO submissions in the ERO Portland field office. Inspections and Compliance Specialists conducted the audit in late January 2016 and will prepare a report and make recommendations to ensure employees are in compliance with regulations and policies. Additional employee training will be provided as needed based on MIU findings.

In this particular case, the two substantiated allegations against [REDACTED] will be referred to ERO management for a determination on discipline. OPR further recommends [REDACTED] go through supplemental training on what does and does not qualify for AUO and the proper preparation of AUO reports. Moreover, as reports were not maintained per policy, OPR recommends a refresher on records retention requirements.

Date	Time In	Vehicle Gate	First Entry Point	Time off facility	Time Out	Vehicle Gate	Last Exit Point	Total time in office (Bold are days where first and last entry are at vehicle gate)	Hours declared	AUO declared ("C" indicates comp time)	Excludable Day	Leave declared	emails
10/15/2013	16:38	N							8	2.0			
10/16/2013	13:11	N			20:18	N	Lvl 1 SW stair ST-1	7:07	8	2.0			
10/17/2013	12:57	N	Lvl 2 west elev lobby		19:26	N	Lvl 1 SW stair ST-1	6:29	8	2.0			
10/18/2013	14:25	N	Lvl 2 fitness center		19:08	N	Lvl 1 SW stair ST-1	4:43	8	2.0			
10/21/2013	13:19	N	Lvl 2 west elev lobby		20:47	Y		7:28	8	2.0			
10/22/2013	12:35	N	Lvl 3 west elev lobby stair		20:34	Y		7:59	8	2.0			
10/23/2013	13:55	N	Lvl 1 west elev lobby 116B		23:02	N	Lvl 1 west elev lobby 116B	9:07	4		1	4	said he'd be out and [redacted] would be acting
10/24/2013								0:00	8	2.0			
10/25/2013								0:00	8	2.0			
10/28/2013	12:22	N	Lvl 2 west elev lobby		20:26	Y		8:04	8	2.0			
10/29/2013	12:25	N	Lvl 2 west elev lobby		13:59	N	Lvl 3 open office (in)	1:34	8	2.0			
10/30/2013	12:42	N	Lvl 1 sw stair st-1		19:18	N	Lvl 1 west elev lobby 116B	6:36	8	2.0			
10/31/2013	12:47	N	Lvl 1 sw stair st-1	18:23-23:33	23:58	Y		11:11	8	2.0			
11/1/2013	13:30	N	Lvl 2 west elev lobby macadam		20:03	N	Lvl 2 west elev lobby parking (in)	6:33	8	2.0			Said [redacted] would be acting for him in the morning but he would be working remotely in the afternoon and available.
11/4/2013								0:00	8	2.0			
11/5/2013	14:22	N	Lvl 1 west elev lobby 116B		19:03	N	Lvl 1 west elev lobby 116B	4:41	8	2.0			
11/6/2013	12:23	N	Lvl 1 west elev lobby 116B		16:13	N	Lvl 1 west elev lobby 116B	3:50	8	1.0			
11/7/2013	13:35	N	Lvl 2 milo rm 229B		17:13	N	Lvl 2 fitness center (in)	3:38	8	1.0			
11/8/2013	15:01	N	Lvl 2 west elev lobby 214B		19:47	N	1st floor entry vestibule	4:46	8	2.0			
11/9/2013	17:59	N	Lvl 1 sw stair st-1		20:09	Y		2:10					gave no notice to supervisors of his whereabouts and put no one in as acting
11/12/2013	16:18	N	Lvl 1 west elev lobby 116B		20:40	Y		4:22	8	2.0			
11/13/2013	13:51	N	Lvl 1 mail recvng 114D		20:38	Y		6:47	8	2.0			
11/14/2013	12:20	N	312D-1 level 3 corridor		22:28	Y		10:08	8	2.0			
11/15/2013	14:25	N	Lvl 2 west elev lobby macadam		18:33	N	Lvl 2 west elev lobby 214B (in)	4:08	8	2.0			
11/19/2013								0:00	8	1.5			
11/20/2013	12:27	N	Lvl 2 west elev lobby 214B	16:28-19:15	19:47	N	Lvl 2 milo rm	7:20	8	1.5			
11/21/2013	12:41	N	Lvl 3 west elev lobby stair		21:47	Y		9:06	8	1.5			
11/22/2013	12:44	N	Lvl 2 west elev lobby 214B		20:10	Y		7:26	8	1.5			
11/25/2013	12:27	Y			20:23	Y		7:56	8	1.5			
11/26/2013	12:42	Y			19:39	N	Lvl 2 fitness center (in)	6:57	8	1.5			
11/27/2013	14:08	N	Lvl 2 vestibule 208B		21:47	Y		7:39	8	1.5			
11/29/2013	13:33	Y			20:23	Y		6:50	7	0.0			
12/2/2013	10:48	N	Lvl 2 west elev lobby 214B	13:31-15:30	20:04	Y		9:16	8	1.5			
12/3/2013	12:37	Y			19:50	N	Lvl 2 milo rm	7:13	8	1.5			
12/4/2013	13:14	Y		16:03-18:24	20:14	Y		7:00	8	1.5			
12/5/2013	12:22	N	Lvl 2 sw stair 1 223B		22:22	Y		10:00	8	1.5			
12/6/2013								0:00	5			3	
12/9/2013	12:48	Y			19:28	N	Lvl 2 fitness center (in)	6:40	8	1.5			
12/10/2013	14:23	Y			18:11	N	Lvl 1 west elev lobby 116B	3:48	7	1.5			
12/11/2013	12:46	Y			21:22	Y		8:36	8	1.5			

12/12/2013	13:18 Y		19:21 N	Lvl 2 fitness center (in)	6:03	8	1.5	
12/13/2013	12:41 Y		18:53 N	Lvl 2 west elev lobby parking (in)	6:12	8	1.5	
12/16/2013	12:21 Y		18:31 N	Lvl 2 fitness center (in)	6:10	8	1.5	
12/17/2013	12:11 Y		18:01 N	Lvl 2 milo rm (in)	5:50	8	1.5	
12/18/2013	14:30 Y		19:10 N	Lvl 2 fitness center (in)	4:40	8	1.5	
12/19/2013					0:00	8	1.5	
12/20/2013	12:47 N	Lvl 1 sw stair st-1	18:14 N	Lvl 2 fitness center (in)	5:27	8	1.5	
12/23/2013	12:32 Y		14:45 Y		2:13	8	1.5	
12/24/2013					0:00	8	1.5	
12/30/2013	13:18 Y		18:24 N	Lvl 2 milo rm (in)	5:06	8	1.5	
1/3/2014					0:00	8	1.5	
1/6/2014	10:42 N	Lvl 2 west elev lobby macadam	19:18 N	Lvl 2 fitness center (in)	8:36	8	1.5	
1/7/2014	12:34 N	Lvl 2 sw stair 1 223B	20:08 Y		7:34	8	1.5	
1/8/2014	13:05 Y		22:43 Y		9:38	8	1.5	
1/9/2014	17:39 N	Lvl 1 west elev lobby 116B	18:19 N	Lvl 2 bond rm 206B	0:40	8	1.5	
1/10/2014	13:28 Y		17:27 Y		3:59	8	1.5	
1/13/2014	14:02 Y		20:24 Y		6:22	8	1.5	
1/14/2014					0:00	8	1.5	
1/15/2014	13:58 Y	16:50-18:39	20:18 Y		6:20	8	1.5	
1/16/2014					0:00	8	1.5	
1/17/2014					0:00	8	1.5	
1/21/2014	13:42 Y		18:42 N	Lvl 2 milo rm (in)	5:00	8	1.5	
1/22/2014	12:59 Y	16:02-17:14	22:51 Y		9:52	8	1.5	
1/23/2014	15:02 Y		18:35 N	Lvl 2 fitness center (in)	3:33	6	1.5	2
1/24/2014	13:42 Y		19:30 N	Lvl 1 west elev lobby 116B	5:48	8	1.5	
1/27/2014	12:32 Y		20:01 Y		7:29	8	1.5	
1/28/2014	12:30 N	Lvl 2 west elev lobby 214B	20:30 Y		8:00	8	1.5	
1/29/2014	14:21 Y		0:47 Y		10:26	8	1.5	At a morning meeting.
1/30/2014	12:41 Y		19:53 N	Lvl 2 fitness center (in)	7:12	7	1.5	1
1/31/2014	11:33 N	Lvl 3 west lobby	20:11 Y		8:38	8	1.5	
2/3/2014	14:19 Y		20:36 Y		6:17	8	1.5	
2/4/2014	12:22 N	Lvl 2 corridor 206F	20:30 Y		8:08	8	1.5	
2/5/2014	12:32 Y	15:58-17:51	23:34 Y		11:02	8	0.5	
2/6/2014	13:15 N	Lvl 2 west elev lobby 214B	20:48 Y		7:33	8	2	
2/9/2014	19:47 Y		20:50 N	Lvl 1 inside east pedastal garage	1:03			
2/10/2014	15:43 N	Lvl 3 west lobby	20:22 Y		4:39	8	1.5	
2/11/2014	13:06 Y		20:46 Y		7:40	8	1.5	
2/12/2014	12:39 N	Lvl 3 training 309H	20:50 Y		8:11	8	1.5	
2/13/2014	13:06 Y	16:03-17:21	20:30 Y		7:24	8	1.5	
2/14/2014	11:24 N	Lvl 2 west elev lobby 214B	20:42 Y		9:18	8	1.5	
2/18/2014					0:00	8	1.5	
2/19/2014	14:16 Y		0:20 Y		10:04	8	1.5	
2/20/2014	14:36 Y		18:25 N	Lvl 3 open office (in)	3:49	8	1.5	
2/21/2014	10:54 N	Lvl 2 vestibule 208B	16:38 N	Lvl 3 open office (in)	5:44	8	1.5	
2/24/2014	12:18 Y		19:41 N	Lvl 2 fitness center (in)	7:23	8	1.5	
2/25/2014	12:06 N	Lvl 3 open office	18:09 N	Lvl 3 open office (in)	6:03	8	1.5	
2/26/2014	13:07 Y		23:19 Y		10:12	8	1.5	

2/27/2014	13:22 Y			18:12 N	Lvl 3 open office (in)	4:50	8	1.5		
2/28/2014	15:54 N	Lvl 3 west lobby		17:55 N	Lvl 3 break room (in)	2:01	4	1.5		4
3/3/2014	12:51 Y			21:57 Y		9:06	8	1.5		
3/4/2014	12:31 N	Lvl 3 open office		18:17 N	Lvl 3 open office (in)	5:46	8	1.5		
3/5/2014	13:13 Y			21:07 Y		7:54	8	1.5		
3/6/2014						0:00	3		1	Claimed to be out today and 5 tomorrow with [REDACTED] acting.
3/10/2014	13:06 Y			20:39 Y		7:33	4	1.5		4
3/11/2014	11:10 N	Lvl 3 west lobby		19:15 N	Lvl 3 open office (in)	8:05	8	1.5		
3/12/2014	14:35 Y			20:36 Y		6:01	8	1.5		
3/13/2014	15:14 Y			18:25 Y		3:11	8	1.5		Meeting in Beaverton in the morning.
3/14/2014	13:04 Y		15:08-16:09	17:57 Y		4:53	8	1.5		
3/17/2014	16:59 Y			20:57 Y		3:58	8	1.5		
3/18/2014	12:16 Y			20:37 Y		8:21	8	1.5		
3/19/2014	11:18 N	Lvl 3 west lobby		19:12 N	Lvl 3 open office (in)	7:54	8	1.5		
3/20/2014	17:09 Y			20:26 Y		3:17	8	1.5		
3/21/2014						0:00	8	1.5		
3/24/2014	13:00 Y			17:05 Y		4:05	8	1.5		
3/25/2014	13:06 N	Lvl 3 west lobby		19:20 N	Lvl 3 training 309H	6:14	8	1.5		
3/26/2014	12:43 Y		16:41-18:55	21:07 Y		8:24	8	1.5		
3/27/2014	12:42 Y			18:54 N	Lvl 3 training 309H	6:12	8	2		
3/28/2014	12:54 N	Lvl 3 west lobby		19:36 N	Lvl 1 west elev lobby 116B	6:42	8	1.5		
3/31/2014	12:02 N	Lvl 3 west lobby		18:53 N	Lvl 3 open office (in)	6:51	8	1.5		
4/1/2014	12:57 Y			18:18 N	Lvl 3 break room (in)	5:21	8	1.5		
4/2/2014	12:28 N	Lvl 3 break room		18:24 N	Lvl 2 fitness center (in)	5:56	8	0		
4/3/2014	12:40 Y			20:06 Y		7:26	8	1.5		
4/4/2014	11:37 N	Lvl 3 west lobby		22:09 Y		10:32	8	1		
4/7/2014	13:28 Y			22:22 Y		8:54	8	1.5		
4/8/2014	12:44 Y			18:29 N	Lvl 3 open office (in)	5:45	8	1.5		
4/9/2014	11:40 N	Lvl 3 west lobby	16:51-18:49	21:34 Y		9:54	8	1.5		
4/10/2014	13:01 Y		16:18-17:33	18:16 N	Lvl 3 open office (in)	5:15	8	1.5		
4/11/2014	12:50 Y			15:20 Y		2:30	5		1	3
4/14/2014	12:53 Y			21:01 Y		8:08	8	1.5		
4/15/2014						0:00	8	1.5		
4/16/2014	12:33 Y			17:53 Y		5:20	8	1.5		
4/17/2014	17:28 Y			21:00 Y		3:32	8	1.5		
4/18/2014	18:09 N	Lvl 3 west lobby		20:31 Y		2:22	8	1.5		
4/21/2014	13:18 Y			21:49 Y		8:31	8	1.5		
4/22/2014	13:15 Y			20:09 Y		6:54	8	1.5		
4/23/2014	13:30 Y		16:12-17:40	20:34 Y		7:04	8	1.5		
4/24/2014	12:59 Y		13:46-15:14	19:07 N	Lvl 3 open office (in)	6:08	8	1.5		
4/25/2014						0:00	4		1	4
4/28/2014						0:00	8	1.5		
4/29/2014						0:00	8	1.5		
4/30/2014						0:00	8	1.5		
5/1/2014	12:35 Y			19:52 N	Lvl 2 vestibule (in)	7:17	8	1.5		
5/2/2014	13:24 N	Lvl 3 west lobby		18:38 N	Lvl 3 open office (in)	5:14	8	1.5		

5/5/2014					0:00	8	1.5		
5/6/2014	13:19 Y			17:42 Y	4:23	8	1.5		
5/7/2014	12:35 Y			20:53 Y	8:18	8	1.5		
5/8/2014	13:28 Y			20:35 Y	7:07	8	1.5		
5/9/2014	14:43 Y		20:19-21:15	21:33 Y	6:50	8	1.5		
									In and out for meetings until 1 early afternoon.
5/12/2014					0:00	7	1.5		
5/13/2014	17:38 Y			20:20 Y	2:42	8	1.5		
5/14/2014	14:40 Y			18:01 N	Lvl 3 open office (in)	3:21	8	1.5	
5/15/2014	15:04 Y			20:57 Y		5:53	8	1.5	
5/16/2014	14:34 Y			18:41 N	Lvl 3 open office (in)	4:07	8	1.5	
5/19/2014					0:00	8	1.5		
5/20/2014	11:17 N	Lvl 3 west lobby		17:23 Y		6:06	8	1.5	
5/21/2014	13:07 Y			20:15 Y		7:08	8	1.5	
5/22/2014	17:13 Y			18:41 N	Lvl 2 west elevator lobby parking	1:28	8	1.5	
5/23/2014					0:00	2		1	6
5/27/2014					0:00	8	0		
5/28/2014					0:00	4		1	4
6/2/2014	12:58 Y			20:51 Y	7:53	8	1.5		
6/3/2015	12:51 N	Lvl 3 west lobby		17:57 N	Lvl 3 open office (in)	5:06	8	1.5	
6/4/2014	12:51 Y		14:51-16:58	20:35 Y	7:44	8	1.5		
6/5/2014	13:39 Y			19:46 N	Lvl 2 fitness center (in)	6:07	8	1.5	
6/6/2014	18:42 N	Lvl 2 sw stair 1 223B		18:44 N	Lvl 3 open office (in)	0:02	8	1.5	
6/9/2014					0:00	8	1.5		
6/10/2014					0:00	8	1.5		
6/11/2014	12:01 N	Lvl 3 west lobby		20:10 Y		8:09	8	1.5	
6/12/2014	14:10 N	Lvl 3 west lobby		17:57 N	Lvl 3 open office (in)	3:47	8	1.5	
6/13/2014	14:15 N	Lvl 3 west lobby	15:28-17:34	19:11 N	Lvl 3 open office (in)	4:56	8	1.5	
6/16/2014					0:00	8			
6/17/2014	13:33 N	Lvl 3 west lobby		15:23 Y		1:50	8	2	
6/18/2014	13:42 N	Lvl 3 west lobby		15:50 N	Lvl 2 fitness center (in)	2:08	8	2	
6/19/2014					0:00	8	1.5		
6/20/2014	12:42 Y			16:16 Y	3:34	8	1.5		
6/23/2014	12:41 Y		14:25-15:45	21:08 Y	8:27	8	1.5		
6/24/2014	13:29 Y			21:05 Y	7:36	8	1.5		
6/25/2014	13:01 Y			19:34 N	Lvl 2 fitness center (in)	6:33	8	1.5	
6/26/2014	13:12 Y		14:34-15:37	18:53 N	Lvl 3 open office (in)	5:41	7	1.5	
6/28/2014	19:29 N	Lvl 2 west elevator lobby		20:02 N	Lvl 1 CCTV/security room (in)	0:33		1	8
6/30/2014	13:09 Y			13:33 Y		0:24	8	1.5	
7/1/2014	12:51 N	Lvl 3 west lobby		20:52 Y		8:01	8	1.5	
7/2/2014	12:49 Y			20:41 Y		7:52	8	1.5	
7/3/2014	15:57 Y			18:29 N	Lvl 3 open office (in)	2:32	8	1.5	
7/7/2014					0:00	8	1.5		
7/8/2014	16:52 Y			21:00 Y	4:08	8	1.5		
7/9/2014	13:48 N	Lvl 3 west lobby		20:37 Y		6:49	8	1.5	
7/10/2014					0:00	6			2
7/11/2014	13:03 Y			17:17 Y	4:14	5			3
7/14/2014	12:52 Y		15:39-17:35	20:06 Y	7:14	8	0		

7/15/2014	12:24 Y			17:53 N	Lvl 2 west elevator lobby parking	5:29	5	0		
7/16/2014						0:00	8	0		
7/17/2014						0:00	8	0		
7/21/2014	13:29 Y	16:28-18:29		21:00 Y		7:31	8	0		
7/22/2014	13:02 Y			20:30 Y		7:28	8	0		
7/23/2014	14:16 Y			20:33 Y		6:17			8.	
7/29/2014						0:00	8	1		
7/30/2014	12:48 Y			16:36 N	Lvl 3 break room (in)	3:48	8	1.5		
7/31/2014	14:19 Y			21:09 Y		6:50	8	1.5		
8/1/2014						0:00	8	1.5		
8/4/2014	14:20 Y			17:23 N	Lvl 2 fitness center (in)	3:03	8	1.5		
8/5/2014						0:00	8	1.5		
8/14/2014	11:28 N	Lvl 3 west lobby		18:33 N	Lvl 2 milo rm 229B	7:05	6	1.5	2	
8/15/2014	12:20 Y			16:03 Y		3:43	8	1.5		
8/18/2014	13:00 Y			15:33 Y		2:33	8	1.5		
8/19/2014	13:12 Y			14:40 Y		1:28	8	1.5		
8/20/2014						0:00	4		1	4
8/25/2014	13:34 Y			17:08 N	Lvl 3 open office (in)	3:34	7	1.5		1
8/26/2014	13:52 N	Vehicle gate (out)		21:37 Y		7:45	6	1.5		2
8/27/2014	14:23 Y		15:21-16:13	19:45 N	Lvl 1 west elev lobby 116B	5:22	8	1.5		
8/28/2014	11:59 N	Lvl 3 west lobby	16:48-18:46	20:12 Y		8:13	4	1.5		4
9/2/2014	13:09 Y			21:19 Y		8:10	8	1.5		
9/3/2014	13:14 Y		13:57-16:40	19:37 N	Lvl 2 fitness center (in)	6:23	8	1.5		
9/4/2014	12:01 N	Lvl 3 break room		18:12 N	West elevator cab	6:11	8	1.5		
9/5/2014						0:00	5	1.5		3
9/8/2014	13:26 Y			20:49 Y		7:23	8	1.5		
9/9/2014	13:07 Y			20:40 Y		7:33	8	1.5		
9/10/2014	13:11 Y			20:56 Y		7:45	8	1		
9/11/2014	13:24 Y			18:48 N	Lvl 1 west elev lobby 116B	5:24	8	2		
9/12/2014	19:13 N	Lvl 2 sw stair 1 223B		19:45 N	Lvl 2 west elev lobby parking (in)	0:32	8		1	
9/15/2014	14:35 Y			20:08 Y		5:33	8	2		
9/16/2014						0:00	8	1.5		
9/17/2014	12:19 Y			20:14 Y		7:55	8	1.5		
9/18/2014	13:28 Y			17:07 Y		3:39	8	1.5		
9/22/2014						0:00	8	1.5		
9/23/2014	12:31 Y		15:48-17:04	20:46 Y		8:15	8	1		
9/24/2014	14:13 Y			18:33 N	Lvl 3 open office (in)	4:20	8	2		
9/25/2014	11:43 N	Lvl 3 west lobby	14:41-16:51	17:52 Y		6:09	8	1.5		
9/26/2014	12:46 Y			21:15 Y		8:29	8	1.5		
9/29/2014	13:26 N	Lvl 3 west lobby		21:02 Y		7:36	8	1		
9/30/2014	12:39 Y			19:08 N	Lvl 3 open office (in)	6:29	8	2		
10/1/2014	16:29 Y			19:24 N	Lvl 2 fitness center (in)	2:55	6	2		2
10/2/2014	12:03 Y			16:59 N	Lvl 3 west lobby (in)	4:56	8	1.5		
10/3/2014	11:42 N	Lvl 3 west lobby		20:38 Y		8:56	8	1.5		
10/6/2014	13:10 N	Lvl 3 west lobby		20:02 N	Lvl 2 milo rm 229B	6:52	8	0		
10/7/2014	12:48 Y			21:01 Y		8:13	8	1		
10/8/2014	16:39 Y			16:43 N	Lvl 3 west lobby (in)	0:04	8	2		

10/9/2014						0:00	8	2
10/14/2014	13:44 N	Lvl 3 open office		19:17 N	Lvl 2 west elevator lobby parking	5:33	8	2
10/15/2014	12:46 Y			20:53 Y		8:07	8	1.5
10/16/2014	17:01 Y			21:21 Y		4:20	8	1.5
10/17/2014	12:53 N	Lvl 3 west lobby		17:15 N	Lvl 3 open office (in)	4:22	8	2
10/20/2014	13:07 N	Lvl 3 west lobby		20:38 N	Lvl 2 sw stair 1 223B	7:31	8	1.5
10/21/2014	12:33 N	Lvl 3 west lobby		20:26 Y		7:53	8	2
10/22/2014	13:26 Y			20:53 Y		7:27	8	2
10/23/2014						0:00	8	2
10/24/2014						0:00	8	
10/27/2014	11:37 N	Lvl 3 west lobby	15:31-17:13	17:24 N	West elevator cab	5:47	8	2
10/28/2014	13:19 Y		17:50-18:44	20:36 N	Lvl 3 open office (in)	7:17	8	2
10/29/2014	14:14 N	Lvl 2 fitness center		21:22 Y		7:08	8	2
10/30/2014	11:49 N	Lvl 2 sw stair 1 223B		19:59 Y		8:10	8	2
10/31/2014	12:14 Y			19:27 N	Lvl 2 milo rm 229B	7:13	8	1.5
11/3/2014	13:16 N	Lvl 2 milo rm 229B		17:40 Y		4:24	7	1
11/4/2014	13:53 Y			19:42 N	Lvl 2 fitness center (in)	5:49	8	2
11/5/2014	12:43 Y			21:10 Y		8:27	8	2.5
11/6/2014	11:54 N	Lvl 3 west lobby		16:04 N	Lvl 3 open office (in)	4:10	8	2
11/7/2014						0:00	8	2
11/13/2014						0:00	8	2
11/14/2014	13:56 N	Lvl 3 west lobby		17:55 N	Lvl 2 fugitive ops	3:59	8	1
11/17/2014	12:57 Y		16:54-18:38	21:24 Y		8:27	8	2
11/18/2014	12:36 N	Lvl 3 west lobby		20:25 N	Lvl 2 milo rm 229B	7:49	8	2
11/19/2014	13:16 N	Lvl 3 west lobby		13:18 N	Lvl 3 open office (in)	0:02	8	2
11/20/2014	13:17 N	Lvl 3 open office		20:45 N	Lvl 3 break room (in)	7:28	8	2
11/21/2014	14:33 N	Lvl 3 west lobby		20:16 N	Lvl 2 fitness center (in)	5:43	8	2
11/24/2014	13:00 N	Lvl 2 sw stair 1 223B		20:50 N	Lvl 3 break room (in)	7:50	8	2
11/25/2014	13:49 N	Lvl 3 west lobby		18:30 N	Lvl 3 training 309H	4:41	8	2
11/26/2014	16:37 N	Lvl 3 west lobby		17:39 N	Lvl 3 open office (in)	1:02	8	2
11/28/2014						0:00	8	1
12/1/2014	13:52 N	Lvl 3 west lobby		20:26 Y		6:34	8	2
12/2/2014						0:00	8	1
12/3/2014	16:45 N	Lvl 3 west lobby		19:50 N	Lvl 2 west elevator lobby parking	3:05	8	2
12/4/2014	12:56 N	Lvl 3 west lobby	15:05-16:26	17:31 N	West elevator cab	4:35	8	2
12/5/2014	13:57 N	Lvl 3 west lobby		17:07 N	Lvl 3 open office (in)	3:10	8	2
12/8/2014	12:20 N	Lvl 3 west lobby	15:31-16:34	21:00 Y		8:40	8	2
12/9/2014	13:19 N	Lvl 3 west lobby		19:33 N	Lvl 2 fitness center (in)	6:14	8	2
12/10/2014	14:38 N	Lvl 3 west lobby		20:35 Y		5:57	8	2
12/11/2014	16:44 N	Lvl 2 sw stair 1 223B		19:06 N	Lvl 3 open office (in)	2:22	8	2
12/12/2014	12:35 N	Lvl 2 sw stair 1 223B		20:15 Y		7:40	8	2
12/15/2014	14:21 N	Lvl 2 sw stair 1 223B		21:18 Y		6:57	8	2
12/16/2014	13:05 Y		16:47-18:09	20:43 Y		7:38	8	2
12/17/2014	16:47 Y			20:07 Y		3:20	8	2
12/18/2014	16:46 Y			17:25 N	West elevator cab	0:39	8	2
12/19/2014						0:00	8	2
12/22/2014	11:21 N	Lvl 3 west lobby		15:40 N	Lvl 3 open office (in)	4:19	8	2

1

1

12/23/2014	14:51 Y			16:33 Y		1:42	8	2		
12/24/2014						0:00	4		1	4
12/29/2014						0:00	8	2		
1/2/2015						0:00	8	2		
1/5/2015	12:10 Y			17:45 N	Lvl 3 open office (in)	5:35	8	2		
1/6/2015	14:19 Y			20:29 Y		6:10	8	2		
1/7/2015	13:17 Y			19:08 N	Lvl 2 corridor 206F	5:51	8	2		
1/8/2015	12:39 N	Lvl 2 west elevator lobby		19:42 N	Lvl 3 open office (in)	7:03	8	2		
1/9/2015	12:43 Y		15:24-17:40	20:35 Y		7:52	8	2		
1/12/2015	14:25 Y			21:02 Y		6:37	8	2		
1/13/2015	13:50 Y			21:21 Y		7:31	8		1	
1/14/2015	18:56 N	Lvl 1 corridor 112G		20:22 Y		1:26	8	2		
1/15/2015						0:00	8	2		
1/16/2015	13:08 N	Lvl 3 west lobby		19:45 N	Lvl 3 open office (in)	6:37	8	2		
1/20/2015						0:00	8	2		
1/21/2015						0:00	8	1		
1/22/2015	12:19 Y			20:14 Y		7:55	8	2		
1/23/2015	12:21 N	Lvl 3 west lobby		20:17 Y		7:56	8	2		
1/26/2015	13:06 N	Lvl 3 west lobby		18:49 N	Lvl 2 milo rm 229B	5:43	8	2C		
1/27/2015	13:28 Y			21:11 Y		7:43	8	2C		
1/28/2015	18:14 N	Lvl 2 sw stair 1 223B		18:51 N	Lvl 1 control room	0:37	8	3C		
1/29/2015	12:10 Y			18:25 N	Lvl 3 open office (in)	6:15	8	2C		
1/30/2015	12:06 N	Lvl 3 west lobby		20:22 Y		8:16	8	2C		
2/2/2015	15:04 Y			19:47 N	Lvl 3 west lobby	4:43	8	2C		
2/3/2015	13:00 Y			20:36 Y		7:36	8	2C		
2/4/2015						0:00	8	4		
2/5/2015	14:57 Y			15:53 Y		0:56	8	1C 2		
2/6/2015	11:54 N	Lvl 3 west lobby		16:43 N	Lvl 1 control room	4:49	8	2C		
2/9/2015	13:01 Y		16:49-18:36	21:12 Y		8:11	8	2		
2/10/2015	14:33 Y			21:01 Y		6:28	8	2		
2/11/2015	15:10 Y		16:34-21:38	21:49 Y		6:39	8	2		
2/12/2015	14:46 N	Lvl 2 sw stair 1 223B		20:02 Y		5:16	8	2		
2/13/2015	12:34 N	Lvl 2 sw stair 1 223B		21:05 Y		8:31	8	2		
2/17/2015	13:39 Y			20:28 Y		6:49	8	2		
2/18/2015	16:22 Y			16:27 N	Lvl 3 west lobby	0:05	8	1		
2/23/2015	13:06 Y			20:49 Y		7:43	8	2		
2/24/2015						0:00	8	2		
2/25/2015	14:32 Y			20:29 Y		5:57	8	2		
2/26/2015	11:49 N	Lvl 2 west elevator lobby		19:19 N	Lvl 3 west lobby	7:30	8	2		
2/27/2015	13:54 N	Lvl 3 west lobby		20:41 Y		6:47	8	2		
3/2/2015	12:44 Y			20:50 Y		8:06	8	2		
3/3/2015	13:17 Y			20:45 Y		7:28	8	2		
3/4/2015	13:21 Y		15:17-16:05	17:49 N	Lvl 3 training 309H	4:28	8	2		
3/6/2015	11:57 N	Lvl 3 west lobby		18:10 N	Lvl 2 corridor 206F	6:13	8	1		
3/9/2015	12:29 Y			21:14 Y		8:45	8	2		
3/10/2015						0:00	8		1	
3/11/2015	14:16 Y			20:00 N	Lvl 2 fitness center (in)	5:44	8	2		
3/12/2015	18:31 N	Lvl 3 west lobby		20:45 Y		2:14	8	2		
3/13/2015						0:00	8		1	

3/16/2015	14:05	Y		21:00	Y	6:55	8	2		
3/17/2015						0:00	8	2		
3/18/2015						0:00	8	2		
3/19/2015	12:13	N	Lvl 3 west lobby	22:43	Y	10:30	8	2		
3/20/2015	12:38	Y		23:19	Y	10:41	8	1		
3/23/2015	14:11	Y		14:45-16:07	21:16	Y	7:05	8	2	
3/24/2015	13:38	Y		15:34-16:19	21:05	Y	7:27	8	2	
3/25/2015	13:26	Y			19:30	N	6:04	8	2	
3/26/2015	13:54	Y			17:09	N	3:15	8	1	
3/27/2015	11:53	N	Lvl 2 sw stair 1 223B		15:26	N	3:33		1	8
3/30/2015	14:14	Y		14:44-17:25	20:28	Y	6:14	8	2	
3/31/2015	13:33	Y			20:21	Y	6:48	8	2	
4/2/2015	17:19	Y			20:55	Y	3:36	4	2	4
4/3/2015	14:02	Y		15:19-17:28	21:15	Y	7:13	8	2	
4/7/2015	14:11	Y		14:14-17:27	22:19	Y	8:08	8	2	
4/8/2015	13:20	Y			22:02	Y	8:42	8	2	
4/9/2015	18:04	N	Lvl 2 sw stair 1 223B		20:48	Y	2:44	8	2	
4/10/2015	12:26	Y			0:29	Y	12:03	8	2	
4/13/2015	13:10	Y			21:13	Y	8:03	8	2	
4/14/2015	14:27	Y			21:07	N	6:40	8	2	
4/15/2015	17:23	Y			17:43	Y	0:20	4	2	4
4/16/2015	11:29	N	Lvl 3 west lobby	12:44-15:23	21:09	Y	9:40	8	2	
4/17/2015	11:37	N	Lvl 2 west elevator lobby		17:54	N	6:17	8	2	
4/20/2015							0:00	8		1
4/21/2015							0:00	8		1
4/22/2015							0:00	8		1
4/23/2015							0:00	8		1
4/24/2015							0:00	8		1
4/27/2015	14:14	Y		21:23	Y	7:09	8	2		
4/28/2015	13:46	Y		15:18-17:21	19:38	N	5:52	8	2	
4/29/2015	13:50	Y			20:59	Y	7:09	8	2	
4/30/2015	17:25	Y			20:14	Y	2:49	4	1	
5/1/2015							0:00	1		7
5/5/2015	13:29	Y		17:38	N	Lvl 2 open office 203G (in)	4:09	8	2	
5/6/2015	13:48	N	Lvl 3 west lobby	19:38	N	Lvl 3 HSDN (in)	5:50	8	2	
5/7/2015	12:48	Y		12:52	N	Lvl 3 west lobby	0:04	8	2	
5/8/2015	12:29	Y		20:21	Y		7:52	8	2	
5/11/2015	13:36	N	Lvl 3 west lobby	19:39	Y		6:03	8	2	
5/12/2015	13:28	Y		21:20	N	1st floor visitor entrance	7:52	8	2	
5/13/2015	13:08	Y		20:59	Y		7:51	8	2	
5/14/2015	16:37	Y		21:12	Y		4:35	8	2	
5/15/2015	12:18	Y		13:21-14:30	20:53	Y	8:35	8	2	
5/20/2015	13:24	Y		15:39	N	Lvl 3 open office (in)	2:15	8	2	
5/21/2015	12:44	Y		20:42	Y		7:58	8	2	
5/22/2015							0:00	8	2	
5/26/2015							0:00	8	2C	
5/27/2015							0:00	8		1
5/28/2015							0:00	8		1
5/29/2015							0:00	8		1

6/8/2015					0:00	8	2C	
6/9/2015	13:08 Y		20:13 Y		7:05	8	2	
6/10/2015	15:03 Y		19:03 N	Lvl 3 west lobby	4:00	8	2	
6/11/2015	13:29 N	Lvl 2 open office	20:16 Y		6:47	8	2	
6/12/2015	12:56 Y		18:45 Y		5:49	8	2	
6/15/2015					0:00	8	2C	
6/16/2015	12:53 Y		18:37 Y		5:44	8	2	
6/17/2015	16:50 Y		20:25 Y		3:35	8	2	
6/18/2015	12:21 Y		20:48 Y		8:27	8	2	
6/19/2015	13:39 Y		17:47 Y		4:08	8	2	
6/22/2015	13:44 Y		21:47 Y		8:03	8	2	
6/23/2015	15:32 Y	17:43-19:58	20:21 Y		4:49	8	2	
6/24/2015	17:22 Y		19:44 Y		2:22	4	2	4
6/25/2015	14:50 Y		20:40 Y		5:50	8	2	
6/26/2015	11:26 Y		16:03 Y		4:37	5	0	3
6/29/2015	12:34 Y		17:58 Y		5:24	8	2	
7/6/2015	13:38 Y	16:21-17:47	21:36 Y		7:58	8	2	
7/7/2015	13:48 Y		20:14 Y		6:26	8	2	
7/8/2015	13:03 Y		20:06 Y		7:03	8	2	
7/9/2015	16:14 Y		19:53 Y		3:39	8	2	
7/10/2015	14:56 Y		20:12 Y		5:16	8	2	
7/13/2015	12:07 Y		20:16 Y		8:09	8	2	
7/14/2015	14:09 Y		21:48 Y		7:39	8	2	
7/15/2015	12:13 Y		18:46 Y		6:33	8	2	
7/16/2015					0:00	4	0	4
7/17/2015					0:00	2	0	6
7/20/2015					0:00	2	0	6
7/28/2015					0:00	8	2	
7/29/2015	13:19 Y		19:24 Y		6:05	8	2	At a social event with photographic evidence
7/30/2015	12:16 Y		22:20 Y		10:04	8	2	
8/31/2015					0:00	8	2	
8/3/2015	18:53 Y		20:27 Y		1:34	4	2	4
8/4/2015	12:44 Y	17:28-18:36	19:52 Y		7:08	8	2	
8/5/2015	13:27 Y	14:44-16:28	20:53 Y		7:26	8	2	
8/6/2015					0:00	1		7
8/7/2015					0:00	1		7
8/10/2015	14:49 Y		20:23 Y		5:34	4	2	4
8/11/2015	13:29 Y		21:16 Y		7:47	8	2	
8/12/2015	13:26 Y		19:51 Y		6:25	8	2	
8/13/2015					0:00	8	2	
8/14/2015	20:07 Y	21:57-23:37	23:37 N	vehicle gate in	3:30	4	2	4
8/15/2015	12:14 N	1st floor entry vestibule	15:32 Y		3:18			
8/17/2015	13:26 Y	SATURDAY	20:49 Y		7:23	8	2	
8/18/2015	14:39 Y		18:09 Y		3:30	8	2	
8/19/2015	13:17 Y		20:22 Y		7:05	8	2	
8/20/2015	18:13 Y		20:27 N	Lvl 3 open office (in)	2:14	8	2	
8/21/2015	16:47 N	Lvl 3 break room	22:31 Y		5:44	8	2	
8/24/2015	13:06 Y		19:57 Y		6:51	8	2	

8/25/2015	13:44 Y			20:04 Y		6:20	8	2		
8/26/2015	13:37 Y			19:55 Y		6:18	8	2		
8/27/2015	15:44 Y			17:46 Y		2:02	5	2		3
8/31/2015	13:09 Y			20:22 Y		7:13	8	2		
9/1/2015	12:32 Y		15:11-17:57	20:48 Y		8:16	8	2		
9/2/2015	12:33 Y			20:12 Y		7:39	8	2		
9/3/2015	12:57 Y			20:27 Y		7:30	8	2		
9/4/2015	13:18 Y			19:29 Y		6:11	8	2		
9/8/2015						0:00	8	2		
9/9/2015						0:00	8	2		
9/10/2015						0:00	8	2		
9/11/2015						0:00	4	2		4
9/14/2015	12:56 Y			18:50 Y		5:54	8	2		
9/15/2015	12:32 Y			21:14 Y		8:42	8		1	
9/16/2015						0:00	8		1	
9/17/2015	12:27 Y			22:15 Y		9:48	8		1	
9/18/2015						0:00	8	2		claimed to be in Washington County at meetings
9/21/2015	12:29 Y		14:20-16:30	20:11 Y		7:42	8	2		stepped out for a noon meeting
9/22/2015	12:30 N	Lvl 3 west lobby		21:19 Y		8:49	8	2		
9/23/2015	16:17 Y			17:46 N	Lvl 3 open office (in)	1:29	5	2		3
9/24/2015	12:28 Y			18:28 N	Lvl 3 open office (in)	6:00	8	2		
9/25/2015						0:00	8		1	
9/28/2015	15:02 Y			17:45 N	Lvl 3 open office (in)	2:43	5	2		3
9/29/2015	12:43 Y			14:54 N	Lvl 2 corridor 206F	2:11	8	2		
9/30/2015	13:21 N	Lvl 3 open office		20:00 Y		6:39	8	2		
10/1/2015	14:46 Y			20:37 Y		5:51	8	2		
10/2/2015	12:03 Y			20:58 Y		8:55	8	2		
10/5/2015						0:00	1			7
10/6/2015	13:02 Y			20:57 Y		7:55	8	1		
10/7/2015	13:44 Y			20:16 Y		6:32	8	0		
10/8/2015	11:43 N	Lvl 3 west lobby		19:57 N	Lvl 2 fitness center (in)	8:14	8	1		
10/9/2015	13:22 N	Lvl 3 west lobby		20:01 N	Lvl 2 milo rm 229B	6:39	8	0		
10/13/2015	13:12 N	Lvl 3 west lobby		20:53 N	Lvl 2 corridor 206F	7:41	8	1		
10/14/2015	12:43 N	Lvl 3 west lobby		21:21 Y		8:38	8	0		
10/15/2015	17:05 N	Lvl 2 sw stair 1 223B		19:28 N	Lvl 3 training 309H	2:23	8	1		
10/20/2015	16:04 N			20:50 Y	1st floor panel #3	4:46	8	1		
10/21/2015	11:08 N	west elevator cab 3		21:59 Y		10:51	8	0		
10/22/2015	16:46 N	Lvl 3 training 309H		20:47 Y		4:01	8	2		
10/23/2015	12:06 N	Lvl 2 sw stair 1 223B		18:07 N	Lvl 2 milo rm 229B	6:01	7.5	1.5		
10/26/2015	13:09 Y			19:20 N	Lvl 2 milo rm 229B	6:11	7	1		1
10/27/2015	11:53 N	Lvl 3 west lobby		19:50 N	Lvl 3 training 309H	7:57	8	1.5		
10/28/2015						0:00	8	1		
10/29/2015	15:18 N	Lvl 3 training 309H		15:18 N	Lvl 3 training 309H	0:00	8	2		
10/30/2015	14:54 N	Lvl 2 west elevator lobby		17:51 N	Lvl 3 west lobby	2:57	8	1		
11/2/2015	11:59 N	Lvl 3 west lobby		18:40 N	Lvl 3 open office (in)	6:41	7	1		1
11/3/2015	20:24 N	Lvl 3 west lobby		20:36 Y		0:12	8	0		
11/4/2015	11:58 Y			21:10 Y		9:12	8	1		

11/5/2015	12:24 N	Lvl 3 training 309H		20:46 Y		8:22	8	2	
11/6/2015						0:00	8	2C	
11/9/2015	13:33 Y			19:20 N	Lvl 2 corridor 206F	5:47	7	2	1
11/10/2015	11:47 N	Lvl 3 west lobby		19:08 N	Lvl 2 corridor 206F	7:21	8	1	
11/12/2015						0:00	8	3C	
11/13/2015	11:44 N	Lvl 2 sw stair 1 223B		16:07 Y		4:23	5	0	3
11/16/2015	12:23 N	lvl 3 source file		22:02 Y		9:39	8	2	
11/17/2015	11:13 N	Lvl 2 west elevator lobby		20:27 N	Lvl 2 elevator lobby	9:14	8	0	
11/18/2015	12:20 N	Lvl 2 elevator lobby		20:05 N	Lvl 2 west elevator lobby parking	7:45	8	2	
11/19/2015	15:08 N	1st floor CCTV/security room		18:08 N	Lvl 3 training 309H	3:00	8	1	
11/20/2015	12:10 N	Lvl 2 west elevator lobby		20:43 Y		8:33	8	1	
11/23/2015	12:16 N	Lvl 2 sw stair 1 223B		19:20 N	Lvl 3 open office (in)	7:04	8	2	
11/24/2015	12:20 N	Lvl 2 fitness center		20:32 Y		8:12	8	1	
11/25/2015	13:32 N	Lvl 2 west elevator lobby		20:40 Y		7:08	8	0	
11/30/2015						0:00	8	2	
12/1/2015	12:26 N	Lvl 3 west lobby		21:03 Y		8:37	8	1	
12/2/2015	20:31 N	Lvl 2 vestibule 208B		20:47 Y		0:16	8	1	
12/3/2015	13:31 Y			19:18 N	1st floor visitor entrance	5:47	8	1	
12/4/2015						0:00	4	0	4
12/7/2015	13:32 N	Lvl 2 sw stair 1 223B		20:45 Y		7:13	8	2	
12/8/2015	13:27 N	Lvl 2 milo rm 229B		21:15 Y		7:48	8	1	
12/9/2015	12:40 N	Lvl 3 open office	13:07-15:06	20:05 N	Lvl 2 fitness center (in)	7:25	8	2	
12/10/2015	15:32 N	Lvl 2 sw stair 1 223B		18:13 N	Lvl 3 open office (in)	2:41	8	1	
12/14/2015						0:00	8	0.5	
12/15/2015	14:40 N	Lvl 3 west lobby		14:40 N	Lvl 3 west lobby	0:00	8	0	
12/16/2015	12:29 N	Lvl 2 elevator lobby		19:50 N	West elevator cab	7:21	8	0.5	
12/17/2015	16:22 N	Lvl 3 west lobby		19:54 N	Lvl 2 milo rm 229B	3:32	8	0.5	
12/18/2015	12:37 Y			21:28 Y		8:51	8	1	
12/21/2015	15:45 N	Lvl 3 ice server room		20:07 N	Lvl 2 fitness center (in)	4:22	8	0	
12/22/2015	14:24 N	Lvl 3 open office		20:33 N	Lvl 2 fitness center (in)	6:09	8	1	
12/23/2015	13:07 N	Lvl 2 sw stair 1 223B		20:31 N	Lvl 1 inside east pedastal garage	7:24	8	0.5	
12/28/2015	13:25 N	Lvl 3 west lobby		20:59 Y		7:34		0.0	
12/29/2015	11:41 N	Lvl 3 west lobby		19:12 N	Lvl 3 IT storage (in)	7:31		0.0	
12/30/2015	14:16 N	Lvl 3 ice server room		20:29 N	Lvl 2 corridor 206F	6:13		0.0	

Average arrival time	13:40	Average departure time	19:32	Average time in office (all days):	4:54 Average AUO	Average leave	1.6 in hours per day	3.816326531
Average arrival time minus leave days and days out of office	13:36	Average departure time minus leave days and days out of office	19:35	Average time minus days with leave declared and days not in the office at all	6:02 declared	Days with 2 hours of AUO	207.0	

Number of days not in the office with no leave declared	72	Days with 1.5 hours AUO declared	170.0	
Number of gate entry/exit days	Average time for gate entry/exit 167 days:	Days with 1 hour of AUO 6:40 declared	Days with some 38.0 leave declared	49
	Number of days not in office with some work declared:	Days with less than 1 hour 93 AUO declared	33.0	
		Days comp time declared as AUO	14.0	