



SOCIAL SECURITY
The Commissioner

Sent Via Overnight Delivery

The Honorable Carolyn Lerner
Special Counsel
U.S. Office of Special Counsel
1730 M St., NW Ste 300
Washington, D.C. 20036

Subject: OSC Case No.: DI-15-3722


Dear Ms. Lerner:

At the request of the Office of Special Counsel (OSC), the Social Security Administration (SSA) conducted an investigation into allegations made by Celeste Moretti (OSC Case No. DI-15-3722). In September 2015, SSA delegated authority to SSA's Office of Inspector General (OIG) to conduct an investigation into this matter.

Ms. Moretti alleged that a co-worker breached an Office of Civil Rights and Equal Opportunity electronic complaint database maintained by SSA's Atlanta region, which resulted in the compromise of Personally Identifiable Information (PII). OIG's investigation revealed that management in the Office of Disability Adjudication and Review, following advice provided by the Office of the General Counsel, found that the breach did not need to be reported under agency policy and that no notifications were required.

The investigation into Ms. Moretti's allegations did not reveal any agency conduct or practices in violation of law, rule, or regulation. Based on the investigation's findings, I do not believe further action or a change in agency procedure is warranted.

SSA is adopting OIG's findings and has enclosed a redacted copy of the Report of Special Investigation. With the conclusion of the OIG investigation, we are closing our inquiry into this matter.

Sincerely,

Nancy A. Berryhill
Acting Commissioner

Enclosures

Cc: John U. Young
Attorney, U.S. Office of Special Counsel

MEMORANDUM

Date: December 11, 2015

Refer To: Case # ATL-15-00066-Z

To:

From: Michael Robinson
Assistant Inspector General for Investigations

Subject: Report of Special Investigation : OSC Case Number DI-15-3722

I am attaching a Report of Special Investigation detailing an investigation that my office conducted at your request, following the above-referenced referral from the Office of Special Counsel (OSC). The referral pertained to an alleged breach of an Office of Civil Rights and Equal Opportunity (OCREO) electronic complaint database maintained by the Atlanta region. As you know, subsequent to the breach, an agency employee filed a whistleblower complaint with the OSC, alleging that the agency failed to notify individuals whose personally identifiable and Privacy Act information had been compromised. You referred this complaint to us for investigation on September 3, 2015. Our investigation substantiated the allegation.

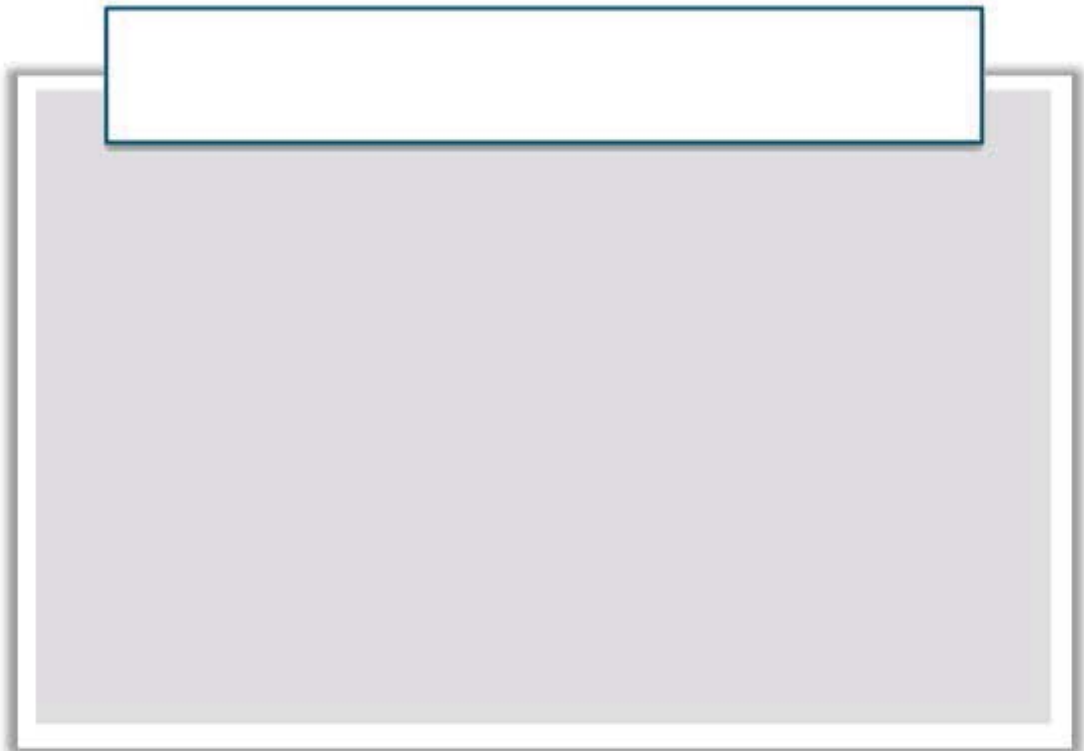
If you have any questions regarding this report, please contact Special Agent in Charge Margaret Moore-Jackson of the Atlanta Field Division at (404) 562-5544.

Attachments

OIG

Office *of the* Inspector General

SOCIAL SECURITY ADMINISTRATION





Office of the Inspector General

SOCIAL SECURITY ADMINISTRATION

Executive Summary

Celeste Moretti, Group Supervisor with the Social Security Administration (SSA), Atlanta Region Office of Disability Adjudication and Review (ODAR), alleged that SSA management failed to notify the individuals whose Personally Identifiable Information (PII) maintained in an Office of Civil Rights and Equal Opportunity (OCREO) database was compromised. The Office of the Inspector General (OIG) focused its investigation on determining whether the SSA notified the owners of the PII in the OCREO database about the breach.

The OMB defines a breach as “the loss of control, compromise, unauthorized disclosure, unauthorized access, or any similar term referring to situations where persons other than authorized users and for an other than authorized purpose have access...to personally identifiable information.” In determining whether breach notification is required, OMB requires an agency to assess the likely risk of harm. Such a risk assessment takes into account the nature of the data elements breached, the number of individuals affected, the likelihood information is accessible and usable, the likelihood the breach may lead to harm, and the ability of the agency to mitigate the risk of harm. Under this policy, “agencies should provide notification without unreasonable delay following the discovery of a breach.”

OIG’s investigation revealed that the Atlanta (Region 4) management decided, under the advisement of the Office of General Counsel (OGC), that the incident did not constitute a reportable PII breach and that no notifications were required. The investigation therefore substantiated Moretti’s allegation that the individuals whose PII was compromised not notified.

Summary of Allegations

This special investigation relates to a breach of an SSA, OCREO, electronic complaint database by former SSA employee Adrienne Bloodworth. Subsequent to the breach, Ms. Celeste Moretti, Group Supervisor, SSA, Office of Disability Adjudication and Review (ODAR), Atlanta North Office, filed a whistleblower complaint with the Office of Special Counsel (OSC), alleging that despite Bloodworth’s removal from the Federal service, none of the employees whose PII was compromised was notified of the breach. Ms. Moretti consented to the release of her name. Moretti alleged that the agency’s failure to notify victims of the breach violated Office of Management and Budget guidance and internal SSA

policies. On August 18, 2015, OSC referred the complaint to SSA, and on September 3, 2015, the agency referred the matter to the OIG for investigation.

Investigative Findings

This special investigation was assigned to Special Agent (SA) Scott Johnson, SSA OIG, Office of Investigations (OI), Atlanta Field Office. SA Johnson contacted SA Michael Davis, SSA, OIG, OI, Birmingham, Alabama, to discuss the OIG's previous investigation of Bloodworth's misconduct.¹ SA Davis stated that the investigation was initiated on a referral from Larry Auerbach (Retired), ODAR Chief Administrative Law Judge (CALJ), Atlanta North. CALJ Auerbach reported that Contact Representative Adrienne Bloodworth was found to be in possession of a number of confidential Equal Employment Opportunity (EEO) complaint documents submitted electronically by other SSA employees. SA Davis' investigation revealed that CR Bloodworth accessed SSA's OCREO database and viewed other SSA employees' complaint information via an internal security vulnerability, printing and disseminating some of these complaints.

The investigation also determined that CR Bloodworth was able to exploit the security vulnerability through the internet web portal of another SSA employee, Michael Henderson. Review of the case file further indicated that approximately 13 confidential EEO reports, filed by nine unique complainants, were found on Bloodworth's desk during a desk audit by Bloodworth's supervisors. SA Davis subsequently presented the case for criminal prosecution; the case was declined based on "identified security vulnerabilities within the OCREO website." Ultimately, the OCREO site was permanently disabled, and Bloodworth was removed from Federal service.

The OIG investigation confirmed that the OCREO database, referred to as "Virtual CREO," maintained 785 complaints filed by 561 complainants. When a complainant entered a complaint in Virtual CREO, the complainant entered basic demographic information and a narrative description of his or her complaint. SSA provided the OIG with an Excel spreadsheet [REDACTED] listing all 561 complainant's names and personal data. The agency did not provide narrative descriptions of individual complaints and informed OIG investigators that reconstructing those complaints would require significant time and resources.

¹ Office of Investigations Case No. ATL-13-00057-D

A “Notice of Proposed Removal” from Moretti to Bloodworth dated January 16, 2014 is attached as [REDACTED]. The notice and attachments detail the evidence relied on to terminate Bloodworth. Reference is also made to the Form OI-97, from Thomas Caul (Retired), OIG Special Agent in Charge, to Ollie Garmon, ODAR Regional Chief Administrative Law Judge, dated March 21, 2014, summarizing OIG’s findings in the initial investigation of Bloodworth after the OCREO data breach [REDACTED].

SA Johnson reviewed SSA policy relating to data breaches involving personal identifiable information (PII), which is outlined in the SSA’s Administrative Instructions Manual System (AIMS) [REDACTED]. According to AIMS, a “[b]reach includes the loss of control, compromise, unauthorized disclosure, unauthorized acquisition, unauthorized access, or any similar term referring to situations where persons other than authorized users and for other than authorized purposes have access or potential access to PII, whether physical or electronic.” Other relevant definitions outlined are Employee, Harm, Level of Impact, PII and Reportable Loss. According to AIMS, “the Deputy Commissioner or equivalent level official of a component that experiences a PII loss or breach is the decision-maker.” AIMS provides that “he or she is the lead for managing the incident and is responsible for ensuring that the component responds to the breach in accordance with agency policy.”

During the course of this special investigation, SA Johnson interviewed the following individuals on the following dates:

1. Celeste Moretti on September 17, 2015.
2. Christopher Craighead on September 21, 2015
3. McArthur Allen on September 24, 2015
4. Michael Henderson on September 25, 2015
5. Marilyn Thompson on September 29, 2015
6. Harold Naves on September 29, 2015
7. Albert Urshansky on September 30, 2015
8. Christopher Yarbrough on October 7, 2015
9. William Randall on October 13, 2015
10. Adrienne Bloodworth on October 23, 2015

Celeste Moretti Interview

On September 17, 2015, SAs Johnson and Erica Wilker interviewed ODAR Group Supervisor Celeste Moretti [REDACTED] Ms. Moretti was interviewed at the SSA-OIG Atlanta Field Office, located at 61 Forsyth Street, Suite 5T55, Atlanta, Georgia, 30303. Prior to any questioning, SA Johnson confirmed the voluntarily nature of the interview with Moretti.

Moretti said that McArthur Allen, Acting Deputy Regional Attorney, Denver Region, and Christopher Craighead, ODAR Group Supervisor, were aware that she was meeting with the OIG and would have documentation to provide that may be helpful to our investigation. Moretti said that Craighead previously made notifications to the Regional Office about the breach but "that it wasn't picked up on." Moretti said that she, Craighead and Allen are happy that something is being done about this matter. (Allen was previously an SSA ALJ and is referred to by Moretti as "Judge Allen.")

Moretti stated that former SSA employee Bloodworth was assigned to Moretti's group on January 1, 2013. Bloodworth started with SSA as a contact representative. According to Moretti, a contact representative is responsible for answering the telephone, monitoring the front window, sending and receiving facsimiles and other basic administrative duties. Moretti said that Bloodworth filed many EEO complaints, including multiple hostile work environment complaints. Moretti said that prior to January 1, 2013, Bloodworth was supervised by Craighead, but because of Bloodworth's multiple EEO filings against Craighead, SSA regional management reassigned Bloodworth to Moretti's group.

Moretti said that Craighead had a conversation with Waconda Nolan, ODAR Administrative Assistant, about Bloodworth. According to Moretti, Nolan and Bloodworth were friends until their friendship became "strained." Moretti said that Nolan told Craighead that he should be cautious of Bloodworth because she had access to various "reports." Nolan mentioned that Bloodworth showed her a report regarding a previous employee who had filed a sexual harassment suit against her supervisor where the supervisor was removed from the office. According to Moretti, Bloodworth suggested to Nolan that they make the same allegation against Craighead and have him removed. Moretti further stated that Nolan informed Craighead that Bloodworth urged her to make "false allegations" against him and that Bloodworth had gotten the idea from viewing EEO counseling reports pertaining to other employees. Moretti continued that she became friendly with Nolan in early 2013, and Nolan told Moretti and Craighead that Bloodworth was able to gain access to the EEO website by double clicking on the name "Michael Henderson." By doing this, Moretti said, Bloodworth was able to access and view all counseling reports for Region 4.

Moretti stated that she learned that Bloodworth was able to access the EEO database from her workstation in her cubicle, as well as from the workstation located at the front desk. Moretti said that Nolan also informed her that Bloodworth printed some of the counseling reports, and Bloodworth made comments to Nolan such as "here is a juicy one." Furthermore, Nolan told Moretti that Bloodworth had forwarded a link to EEO database to Nolan. Nolan said that she was unable to access the EEO complaint database through the link. Moretti said that she learned through her discussions with Nolan that these activities dated as far back as 2008.

According to Moretti, Nolan told her that Bloodworth also forwarded the link to the EEO database to a friend, ODAR Senior Case Technician Tiffany Richardson (also known as Tiffany Thompson). Moretti said that after learning about the breach, she understood certain comments that Nolan made regarding other employees and things "starting clicking." Moretti said for example, Nolan once made a remark that a certain supervisor in the office was a racist and asked Moretti how she could be friendly with this person. Once Nolan advised Moretti of the breach, Moretti asked Nolan if her prior comments about other employees resulted from her (Nolan) viewing records in the EEO database. Nolan replied "yes," that she actually saw EEO complaints against particular employees/managers given to her by Bloodworth.

Moretti further stated that various employees were saying "terrible things" about managers, including upper level managers, in their office. Moretti said that because of Bloodworth, other employees used allegations in the EEO database as a "launch pad" to draft new complaints against managers. Moretti said she believes that her office ranked either first or second for EEO complaints filed against managers. Moretti said that a senior executive recently told Craighead, "If you had handled your employees properly you wouldn't have all these EEO filings against you." Moretti said that she feels like the ODAR management team (Moretti, Craighead, William Randall and Allen) "didn't have a chance in the office" because it was as if employees were "cutting and pasting" from the complaints they had viewed in the EEO database. Moretti said that Nolan advised her that because some of the counseling reports involved "very sensitive issues" such as "extra marital affairs," Moretti feels that the breach was a "horrific violation of privacy."

Moretti said that Nolan agreed to speak on record with her and agreed to provide her with a statement, dated April 8, 2013, regarding the EEO database breach [REDACTED] Moretti provided a copy of Nolan's statement during her most recent OIG interview that matched the statement Nolan previously provided to SA Michael Davis during his investigation of Bloodworth.

Moretti said that after she became aware that Bloodworth had accessed the EEO database, she researched whether this was misconduct and concluded that she should do a desk audit of

Bloodworth. Moretti also stated that one day she saw Bloodworth removing PII from the office and told Craighead that Bloodworth had removed EEO counseling reports and other documents. In May 2013, one month after Nolan informed her of Bloodworth's breach of the database, Moretti and ALJ Auerbach conducted the desk audit. Moretti said that the regional office advised her that they were not permitted to interview and "Weingarten"² Bloodworth unless they found a counseling report on Bloodworth's person or at her workstation. Moretti said that regional management was "not happy with this decision" to interview Bloodworth; however, Moretti conducted the interview anyway. Moretti reported that Bloodworth initially claimed that she represented many of the complainants in the EEO database but then admitted to accessing the database purely out of curiosity.

Moretti advised that in June 2013, she also interviewed Nolan, Richardson and OCREO Director Marilyn Thompson. Thompson advised Moretti that the database Bloodworth improperly accessed was called "Virtual CREO." Moretti said that Thompson explained to her that complainants do retain electronic access after filing; instead, they receive paper copies of their reports. Moretti stated that after meeting with Thompson, she (Moretti) understood that Bloodworth had gained access to far more records than Moretti originally suspected. Moretti said that while she conducted interviews, Craighead worked with OCREO Team Leader Jane Rolan and other employees to disable the "Virtual CREO" database. According to Moretti, the following individuals were responsible for handling the breach and disciplining (removing) Bloodworth: Judge Auerbach, Judge Barry Williams, Craighead, Judge Garmon, Reginald Jackson (previously the Acting Regional Management Officer of the Atlanta ODAR Region and currently a Senior Advisor with SSA, ODAR), Margaret Sullivan, Anita Bellinger (Regional Attorney), Alice Scharfman, Chris Harris, Chris Yarborough and Natalie Liem.

Moretti stated that during Bloodworth's removal process, Moretti discussed notification of the victims of the Virtual CREO breach with Craighead and Judge Allen, and all three of them were concerned about notification, liability for the agency, and the impact on the victims. Moretti said that both Craighead and Judge Allen sent emails to the SSA Regional Office expressing their concerns, but the emails were "ignored."

Moretti stated that in April 2014, when she placed employee Andrew Adams on a performance plan, Adams filed a hostile work environment complaint against Craighead and Moretti. Moretti

² In 1975 the United States Supreme Court, in the case of *NLRB v. J. Weingarten, Inc.*, 420 U.S. 251, upheld a National Labor Relations Board decision that employees have a right to union representation at investigatory interviews. *Weingarten* rights guarantee an employee the right to Union representation during an investigatory interview. These rights must be claimed by the employee. The supervisor has no obligation to inform an employee that s/he is entitled to Union representation.

said that she and Craighead were exonerated in August 2014, but during this time she, Craighead, Randall (Group Supervisor) and Judge Allen were very upset about how they were being treated and how the Regional Office was handling (or not handling) the breach. She stated that they all became more vocal about the poor treatment. Moretti advised that on October 28, 2014, Regional Management Officer Deidra Adams and Hearing Office CALJ Lisa Dabreau, told Randall, Craighead and Judge Allen that they had 15 minutes to clear out their offices. They left Moretti alone with another ODAR manager, Cathy Palmer, but did not provide any other details. Moretti believes that the decision was made by Executive Assistant Tammy Farmer, former ODAR Deputy Associate Commissioner Jim Julian, and former ODAR Deputy Commissioner Glenn Sklar. Moretti said that Judge Garmon refused to remove Judge Allen so DaBreu personally visited the office and removed Judge Allen. Although Moretti was left in the office, she requested to be removed and was finally relocated to the "Writing Unit" at the Richard B. Russell Federal Building, in Atlanta, on March 4, 2015. Moretti said that she was close to having a nervous breakdown because of the matter, which is why she believes the Regional Office finally reassigned her.

On August 18, 2015, Moretti said that the four of them (Judge Allen, Craighead, Randall and Moretti) received a letter dated July 10, 2015, stating that there was no finding of reprisal or any other findings against them. It should be noted that Moretti merely references these letters and did not provide them to OIG. However, Moretti said she and Randall received another letter (also dated August 18, 2015) saying that she and Randall were still being investigated for another matter. Moretti said that the second letter indicated that there "were some concerns" with respect to Moretti and Randall. Moretti said that she, Judge Allen, Craighead, and Randall believe that because they were outspoken about the CREO breach, they were wrongfully investigated, relocated to different offices and treated unfairly. Moretti continued that they "are sure" that because they told everyone in the Regional Office that they would not stop until all victims were notified of the breach; this was the "impetus" for how they (Judge Allen, Craighead, Randall and Moretti) were all treated during the past few years.

Moretti said that she has been interviewed many times and is never told what the interviews are about, and she truly feels that "murderers have more rights" than she has. Moretti said that she was even interviewed as recently as September 15, 2015, regarding something that happened in November 2012. Moretti continued saying that she had been "grilled" for four hours in the past, and she was recently questioned for two hours about a conversation she had with Andrew Adams in November 2012. Moretti said that she was interviewed in September because Adams "secretly recorded" her commenting about ALJ McGrath holding "five minute hearings." Moretti said that when the investigators asked her why she was making negative comments about ALJ McGrath, she replied, "because they are true." Moretti noted that the stated reasons for the interview were without merit and in again retaliation for her strong stance

on the database breach. Moretti noted that ALJ McGrath's five-minute hearings are well known, even to Congress. Moretti said that John D. Kuhn, Division of Quality Services, was the lead investigator on this particular interview. Moretti said that when her attorney tried to contact Kuhn, he never returned calls, and when Judge Allen asked for particular rules, Kimberly Hudson (ODAR Headquarters) would forward a link to the EEO public website. Moretti said it was clear that Hudson, Julian, and Kuhn were playing a "cat and mouse game" with the four ODAR managers (Judge Allen, Craighead, Randall and Moretti). Moretti said that she has often complained about Kuhn's treatment of her, but nothing was done. Moretti said that Kuhn reports to Hudson who reports to Julian, who now has a different position.

Moretti said that Thompson and upper level ODAR managers Glenn Sklar, Judge Garmon, Reggie Jackson and Anita Bellinger (Regional Attorney) were ultimately responsible for notifying everyone involved in the breach. Moretti stated that Bloodworth's termination "went through so many hands" because she had so many EEO filings.

Moretti said that after Bloodworth was interviewed and her misconduct was uncovered, Moretti and the other managers asked that Bloodworth's access to the SSA network be revoked and for Bloodworth to be placed on administrative leave pending disciplinary proceedings, but the Regional Office denied these requests. Moretti and the other managers felt as though Bloodworth had nothing to lose and might say things like "I really enjoyed reading your counseling reports," causing problems for Moretti and other managers who were aware of the breach. Moretti continued that she has had "countless sleepless nights" over the breach, and the fact that the victims have not been contacted is simply "wrong." Moretti said that she did not request to remain anonymous because she feels like she is doing the right thing, is well-aware that filing a whistleblower complaint is not "career enhancing" but it is "the right thing to do," and she is "not ashamed of what she is doing" and "can live with herself" for reporting it. Moretti said that she "can't help but think that somebody somewhere is going to be grateful that somebody says this is wrong." Moretti opined that Craighead and Judge Allen feel the same.

Ms. Moretti reported during her interview that she found the following complainants' counseling reports on Bloodworth's desk during two desk audits:

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]
5. [REDACTED]

6. [REDACTED]
7. [REDACTED]
8. [REDACTED]
9. [REDACTED]

It should be noted that all complaints filed by the above individuals were addressed and sent to OCREO Director Thompson. Moretti said that when she first obtained the counseling reports for the above individuals from Bloodworth's desk, they had been printed on three different days. Moretti confirmed that Bloodworth was working on all three of these dates.

Moretti stated that everyone who filed a complaint, as well as all of the Responsible Management Officials (RMOs) named in the complaints, should be contacted and notified of the breach. Moretti noted that the extent of the breach is unknown, as Bloodworth could have read every report in the database. Moretti expressed concern that "people's reputations have been ruined" because of the breach. Moretti noted that as someone that has been falsely accused multiple times, she is very concerned that she does not know who knows her home address, her telephone number, her testimony, the specific accusations and her responses to those accusations. Moretti continued that a major consequence of the breach was the large volume of EEO complaints that were filed within the Atlanta North region. Moretti said that she may even lose her liability insurance because of all the false accusations against her. Moretti said that she began supervising Bloodworth in January 2013, and Bloodworth began filing complaints against her in March 2013. Moretti continued that she feels as though the breach essentially provided "templates" to those individuals who filed complaints on frequent basis.

Moretti said that her workday in the office effectively did not start until 3:30 p.m., when most of the staff left the office, and this was because of all the problems and issues caused by the EEO complaints. Moretti said that she would often work until 8:30 p.m. but was still treated terribly, seemingly in retaliation for reporting the breach. Moretti stated that Kathy Palmer, a supervisor who worked for 40 years, recently retired because of how poorly she and the others were treated. Moretti said that she is trying to find a job with another agency because it is clear that her current management is "going after her." Moretti said that she and the other managers (Craighead, Randall and Judge Allen) take public service seriously, and the consequences of their stance on the breach are "demoralizing."

Christopher Craighead Interview

On September 21, 2015, SAs Johnson and Wilker interviewed Atlanta Hearing Office Director Christopher Craighead [REDACTED]. Prior to any questioning, OIG advised Craighead of the voluntary nature of the interview. Craighead said that he understood and agreed to

continue. Craighead said that he was aware of Moretti's whistleblower complaint and aware that she had spoken with OIG about this matter.

Craighead said that he reported to the Atlanta North ODAR region in August 2011 as a Group Supervisor. Craighead said that he noticed severe "conduct issues" in the office soon after he arrived in the office. After being in the office for about three months, Craighead said that he was promoted to Hearing Office Director. Craighead said that soon after moving to the Atlanta North Office, he learned of an employee disseminating EEO reports and employee award information to other employees. He noted that this behavior seemed to contribute to the serious morale problems present in the office. According to Craighead, the employee passing out EEO reports was Bloodworth. Craighead said that soon after his arrival in the office he hired Moretti as a Group Supervisor.

Craighead recalled a situation when Bloodworth complained to him that it was unfair that another employee, Katie Glass, had received an award. Craighead advised that he was concerned and conducted an inquiry to find out how Bloodworth knew of Glass' award. Craighead subsequently interviewed Bloodworth, Glass, and Nolan, and Craighead Nolan eventually admitted that Bloodworth "bullied" her into "passing out the information" regarding Glass' award. Craighead said he felt he had sufficient evidence to take action against both employees; however Regional Office management did not support disciplinary action. Craighead said that the Regional Office did not want to create an appearance of retaliation against Bloodworth because she had recently filed a complaint against Craighead.

According to Craighead, the Regional Office later directed him not to take any action against Bloodworth. Craighead said regional management ultimately supported his decision to suspend Nolan and upheld that action. Craighead said that he pursued a lenient suspension for Nolan since she was cooperative and truthful during his investigation. Craighead also advised that during the same period, Nolan admitted that Bloodworth tried to convince her (Nolan) to file a sexual harassment claim against him (Craighead) because he had taken disciplinary action against her (Nolan). Craighead said that he brought this to the attention of the Regional Office, but nothing was done.

Craighead said that over time his working relationship with Nolan improved. Craighead said that Nolan explained to him how Bloodworth accessed the EEO website. Craighead advised that he and Nolan met specifically to discuss the EEO website and her understanding of Bloodworth's access to this site.

Craighead said that he met with OCREO Team Leader Jane Rolen, regarding a possible breach, and Rolen sent him the link. Craighead stated that he was unable to get into the database using

the link but forwarded the link to another employee who accessed the Virtual CREO database. Craighead said that once the system was accessed, he was able to see all of the complaints, which were broken down by component and year. Craighead said that the thought of Bloodworth and Nolan having access to this information made him "sick." Craighead stated that in March of 2013, he wrote a Fact Sheet summarizing the "Virtual CREO" compromise/breach and about a week later the EEO website was disabled. On March 19, 2013, Craighead sent OCREO Director Thompson an email summarizing his findings.

Craighead said that on March 25, 2013, he sent an email to Attorney Advisor Daniel Grunberg, again explaining the systems compromise/breach. Craighead said that to the best of his recollection there were two meetings and at least two conference calls about the breach.

Craighead said that he was the deciding official in the removal of Bloodworth. Craighead stated that he knew of all the complainants whose documents were found on Bloodworth's desk except for one, Helen Harris. Craighead confirmed the following individuals' counseling reports were found on Bloodworth's desk:

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]
5. [REDACTED]
6. [REDACTED]
7. [REDACTED]
8. [REDACTED]

Craighead said that he was very surprised that regional management removed charges from the initial draft of the removal notice for Bloodworth. Craighead stated that he was shocked the region was not supportive of Bloodworth's removal until ODAR employees expressed their concerns.

Craighead opined that OCREO or the Office of General Counsel (OGC) should be responsible for notifying the victims of the breach. Craighead assumed a "generic" letter would be sent to everyone listed in the database, including those who had complaints filed against him or her. Craighead said that to his knowledge there has not been any kind of notification. Craighead said he "doesn't feel as though it is fair to the accused or the aggrieved that the information isn't protected." Craighead said that he feels as though he, Moretti, and ALJ Allen have done everything they can to advocate for victim notification. Craighead further said that he firmly believes that the breach precipitated claims that otherwise would not have been filed.

Craighead said that he feels as though he was reassigned to another office because he has been so vocal about the EEO breach. Craighead noted that he has had to fight for everything in his office, and he has been met with a lot of resistance because he was passionate about the breach. Craighead said that he is will be fearful of retaliation for the rest of his career for his cooperation with this investigation and his stance on the breach.

Craighead referenced an email that Judge Allen sent to Regional Attorney Anita Bellinger summarizing the breach/compromise and inquiring about what, if any, action should be taken. Craighead reported that Judge Allen never heard back from Bellinger.

On September 28, 2015, Christopher Craighead contacted SA Johnson and stated that he had additional documents to provide, including the email from Judge Allen to Bellinger. Craighead and SA Johnson agreed to meet in the lobby of the Sam Nunn Federal Building the morning of September 29, 2015, at 11:00am. Consequently, on September 29, 2015, Assistant Special Agent in Charge Guy Fallen, SSA, OIG, and SA Johnson, met with Craighead in the lobby of the Sam Nunn Federal Building located at 61 Forsyth Street, Atlanta, Georgia, 30303. Craighead provided additional emails with respect to this investigation. During the short meeting, Craighead said that based on the review of one email from Administrative Assistant Leachia Ashley, it appears that Bloodworth was in fact able to see all the complaints within the EEO database.

McArthur Allen Interview

On September 24, 2015, SAs Johnson and Wilker conducted a telephonic interview of Acting Deputy Regional Commissioner McArthur Allen, Denver Region [REDACTED]. It should be noted that prior to his position as Acting Deputy Regional Commissioner, Allen was an ALJ and is referred to throughout this report and investigation as Judge Allen. Prior to questioning, SA Johnson identified himself to Judge Allen and informed him of the voluntary nature of the interview. Judge Allen said that he understood that the interview is voluntary and agreed to continue. Judge Allen stated that he wants to cooperate with this investigation but emphasized that he fears retaliation for his cooperation. He stated that he feared that the other managers (Moretti, Craighead and Randall) would be retaliated against as well. Judge Allen stated that ODAR Attorney Kristen Fredricks was involved with his reassignment from the Atlanta region, and he is concerned that Fredricks now works for the OIG. Judge Allen said that he fears retaliation from Fredricks, in addition to other managers/supervisors because of his involvement

with this investigation.³ Judge Allen advised that he feels as though he and his managers "did the right thing" and in turn "had a ton of bricks" thrown at them. Judge Allen requested the same whistleblower protections as Moretti with respect to this matter.

Judge Allen stated that he arrived in the Atlanta North Region in October or November 2013, and left on October 28, 2014. Judge Allen said that after the OCREO data breach, he sent an email to Regional Attorney Bellinger, referencing the "systems failure," suggesting that the individuals listed in the database be contacted and offering to make the necessary notifications. Judge Allen later provided the OIG a copy of this email dated December 10, 2013, which is attached to [REDACTED] and reads as follows:

"Good Morning Ms. Bellinger

I wanted to follow-up on the conference that Atlanta North management had with the RO and OGC last Thursday. While we certainly respect the position of everyone in the room, there were a few remaining questions that are probably better answered by you as the Regional Attorney. As you know, after much debate and advice of counsel AtlN mgmt. reluctantly conceded to the removal of the specification unauthorized entry/access into the CREO database. However, we were left with a few questions that we now seek your advice and counsel on while we await the results of any disciplinary action.

- 1. Because there has been an disclosure of PII from the CREO database, who is responsible for notifying the individuals that their information may have been disclosed to unauthorized personnel? The RO or CREO?*
- 2. Because the above specification is being removed, does that relieve the RO/CREO from informing the individuals of the unauthorized disclosure of their PII? If so, how should we handle any potential situation of the employee sharing the contents of the proposal (i.e. a victim of the PII disclosure may see the proposal and inquire if that is their case)?*
- 3. Because there has obviously been a system failure (that allowed unauthorized individuals access into private/personal information), have the executives and GC of the agency been*

³ On October 1, 2015, Ms. Fredricks was detailed from ODAR to the Office of Counsel to the Inspector General. On October 13, in a memorandum to the Inspector General, the Chief Counsel to the Inspector General [REDACTED] confirmed that Ms. Fredericks would not participate in any decisions pertaining to ODAR. Consequently, Ms. Fredricks was not involved in any aspect of this investigation.

informed (i.e. does this same system weakness exist outside Region IV leaving the agency vulnerable to other systems failure and/or exploitations)?

4. *Recently, DC Sklar directed all SSA employees that when you see something, say something (although I realize that this occurred prior to my arrival, I want to be sure that the managers and I have complied with this directive by reporting this incident to the RO), are there any other actions that I or the managers of AtlN should take regarding this disclosure?*

Thank you for your consideration of these questions and anticipated response/advice.”

Judge Allen said that Bellinger responded that all the parties have been notified and no action was necessary. Judge Allen said that he responded to Bellinger via email stating that he and his managers would therefore not take any action unless they hear otherwise. Judge Allen stated he and his management team envisioned an email being sent to everyone, “similar to that which is sent out by credit card companies,” notifying all the individuals that their PII had been compromised. However, according to Judge Allen, no notifications were made. Judge Allen reiterated his fear of retaliation for cooperating with this investigation and the interview concluded.

Michael Henderson Interview

On September 25, 2015, SAs Johnson and Wilker interviewed OCREO EEO Expert Michael Henderson, Atlanta [REDACTED]. Prior to any questioning the agents notified Henderson of the voluntary nature of the interview. Henderson said that he understood and agreed to continue. Henderson confirmed that he was speaking freely and voluntarily. Henderson said that he has not heard anything about the Virtual CREO breach since last speaking to SA Michael Davis a couple of years ago.

Henderson said that he reports to OCREO Director Thompson. Henderson said that "Virtual CREO," was created regionally in Atlanta. According to Henderson, the breach was strictly regional. Henderson said he believes the database was created under Thompson's leadership. Henderson said that other regions were thinking of implementing this system and in fact, the national system, called "iComplaints," was modeled after "Virtual CREO." Henderson said that he never participated in any meetings regarding the breach. Henderson said that to his knowledge, other OCREO staff members, including Team Leader Jane Rowlan, IT Specialist Albert Urshansky, EEO Expert Harold Naves, and Director Thompson were notified of the breach.

Henderson said that he believes Bloodworth was able to gain access to "Virtual CREO" by clicking on an icon that showed all cases. Henderson said that once the breach was discovered, Urshansky disabled the system. Henderson said that the name, date of birth, Social Security Number, position, title, office of the grievor, office of the alleged discrimination, and a synopsis of the complaint were all maintained within each report in the database. Henderson said that he does not believe that the person viewing the complaint could see the entire Social Security Number. Henderson said that copies of the counseling reports were routinely sent to the complainant, the EEO counselor, and the representative of the complainant, if any. Henderson further stated that every OCREO staff member had access to "Virtual CREO."

Henderson said, to his knowledge, none of the individuals from the database was ever notified about the PII breach. Henderson said that during the time of the breach, no one in his office ever told him that the victims would be notified. Henderson said that although he does not know who was ultimately responsible for notifying everyone but that in his opinion, he considers it a breach and he believes all the individuals in "Virtual CREO" should have been notified.

Marilyn Thompson Interview

On September 29, 2015, SAs Johnson and Wilker interviewed OCREO Director Marilyn Thompson, Atlanta [REDACTED]. Prior to any questioning the agents advised Thompson of the voluntary nature of the interview. Thompson said that she understood and agreed to continue. Thompson confirmed that she was speaking freely and voluntarily.

Thompson stated that "Virtual CREO" was created by Office of Automation, and she believes that Albert Urshansky was the lead on creating the database. Thompson said that since the previous database "crashed," there was a need for a more "sophisticated database" and Virtual CREO was created. Thompson said that because Region 4 had so many EEO complaints compared to other regions, a more sophisticated database was needed. According to Thompson, Virtual CREO was rolled out in approximately 2004. Thompson said she is not sure if historical data was input into Virtual CREO at the time of its inception. Thompson stated that she, Harold Naves, Michael Henderson and Albert Urshansky were the only employees that had a "master personal identification number" or absolute access to the database. Thompson stated that the database was supposed to be a secured site and that only a handful of employees had unfettered access. Thompson said that she has not heard from Bloodworth since her removal from the Agency. Bloodworth is currently appealing her removal from the Federal service.

Thompson said that she is not aware of how many complainants/records were in the database at the time of the breach. Thompson said, however, the "number of EEO complaint workload" for new cases "averaged around 200 per year." Thompson continued, "since Ms. Bloodworth is no

longer with us it has dropped like forty cases" per year. Thompson said that Bloodworth was a frequent filer and is responsible for a number of complaints. Thompson said that she is not aware of how Bloodworth was able to circumvent the Virtual CREO database and gain access. Thompson said that once she learned that Bloodworth was able to gain access to Virtual CREO, it was disabled immediately. Thompson said it was her decision to disable the database.

Thompson said that after the breach occurred, she did not attempt to contact or notify any complainants or any other person identified in the database. Thompson stated that she attended several meetings with Office of General Counsel personnel in which the "guidelines" pertaining to PII losses were reviewed and discussed. Thompson opined that the loss from this breach "didn't meet the threshold" for victim notification. Thompson stated "it was not her final decision" but "it was just her two cents." Thompson further said that "ODAR and OGC concurred" with her decision that the loss did not rise to the level of requiring notification of people whose information was maintained in the database. Thompson recalled that the determination was based on the lack of "malicious intent" on Bloodworth's part. Thompson said that she recalled sending an email to OGC stating her position that this was not a reportable PII breach. Thompson advised that sometime later she received an email from someone in OGC that confirmed her assessment.

Thompson said that paper files were also maintained, addition to the automated files Virtual CREO.

Thompson stated that she could not recall that anyone in the meetings with OGC advised that victims of the PII breach should be notified.

Later that afternoon, on September 29, 2015, SA Johnson received an email from Thompson [REDACTED] containing emails that she sent to OGC with respect to the breach.

Harold Naves Interview

On September 29, 2015, SAs Johnson and Wilker interviewed OCREO EEO Expert Harold Naves, Birmingham, Alabama [REDACTED]. Naves stated that he joined the OCREO staff in 2005. Naves stated that he believes that Virtual CREO went live in either 2005 or 2006. Naves said that he "is not technically savvy" but believes Virtual CREO "works off the main server." He noted that Information Specialist Albert Urshansky would be able to provide more information and details with regard to Virtual CREO, as he was responsible for "bringing the idea to fruition."

Naves said he does not know how many records were in the Virtual CREO system at the time of the breach. Naves said that he believes that they started inputting complaints/records into Virtual

CREO in approximately 2006 or 2007. Naves does not know how Bloodworth gained access to the Virtual CREO system and was not involved in any meetings or telephone calls regarding the breach or the Bloodworth matter.

Albert Urshansky Interview

On September 30, 2015, SAs Johnson and Wilker interviewed Information Technology Specialist Albert Urshansky, Center for Automation, Security and Integrity [REDACTED]. Prior to any questioning, the agents notified Mr. Urshansky of the voluntary nature of the interview. Urshansky said that he understood and wished to continue with the interview.

Urshansky said that to his knowledge, the idea for the automated complaint database, known as "Virtual CREO," came about in 2006. Urshansky stated that the database was approved by SSA Headquarters prior to going live, and it met all systems requirements. According to Urshansky, the previous CREO director "Herb" (later identified has Herberto Sanabria), came up with the idea to develop the system in 2006 and the database went "live in 2007." Urshansky stated that the database was live from some time in 2007 until the database was disabled in 2013. There were 785 complaints filed by 562 individuals maintained in the system. Urshansky further stated that these data do not include historical data. Urshansky said that to his knowledge, Virtual CREO was disabled to give way to "iComplaints," which is the nationwide database for electronic complaints.

Urshansky said that his understanding of the breach was that a female SSA employee (does not remember her name), who did not have the authority to access the system, was able to access EEO counseling reports and records maintained within the Virtual CREO database. Urshansky said his understanding is that she "hacked" into the database and was "being nosy." Urshansky said that his supervisor, Ron Fritz, notified him of the breach. According to Urshansky, he knew the employee was able to see some of the records but did not know which ones she actually viewed.

Urshansky went on to describe the various assigned access roles within the database. According to Urshansky they were as follows:

- Administrator - Individuals with this access could view everything.
- Mentor - Individuals with this access could only view the cases they were mentoring.
- EEO Counselor - Individuals with this access could only see the cases they were assigned.
- Report User – This was read only access and held by the executive staff. Most information here consisted of statistical data.

Urshansky claims that only the last four digits of the complainant's Social Security Number was listed along with the following information: name, home address, home telephone, work location/unit, work telephone, basis of complaint/type of discrimination and other issue. Urshansky believes that the counseling forms that were printed and generated matched what was viewed on the screen by the user.

Urshansky stated that both servers, one for the database and one for the web application, were located in the LAN room on the 22nd floor of the Social Security Office in the Sam Nunn Building, located at 61 Forsyth Street, Atlanta, Georgia. Urshansky further advised that the server was restricted.

At the conclusion of the interview, we showed Urshansky copies of the various counseling reports that were found on Bloodworth's desk during the desk audit by Moretti. Because there were different counselors for each report, Urshansky thinks that Bloodworth may have had an "Administrator" type access and therefore could view everything within the database.

On December 10, 2015, Urshansky provided SA Johnson with a list of the 561 individuals who filed complaints. Urshansky sent the list via email in a password protected excel spreadsheet. The spreadsheet of the 561 different individuals provided by Urshansky listed the following information for each complainant/employee:

- First and last name
- Date of birth
- The last four digits of complainant's Social Security Number (SSN)
- Region
- Component
- Title
- Grade
- Email address
- Home address
- Home telephone number
- Date the employee was entered into the OCREO database

Urshansky stated that he is not able to recover the counseling forms for each employee as they were sent directly to the employee and their respective counselor. SA Johnson subsequently asked Urshansky if it was possible to identify any Responsible Management Officials who were identified when employees filed a complaint. Urshansky further stated that he would be able to obtain each initial complaint filed by the employees, however, the process would be extremely labor intensive.

Christopher Yarbrough Interview

On October 7, 2015, SA Johnson and Assistant Special Agent in Charge (ASAC) Guy Fallen interviewed Assistant Regional Counsel Christopher Yarbrough, Office of General Counsel [REDACTED]

As background, on September 30, 2015, SA Johnson contacted Yarbrough. After identifying himself, Johnson informed Yarbrough that he was conducting an investigation pursuant to an Office of Special Counsel whistleblower complaint relating to an alleged PII breach at SSA in 2013. Johnson explained to Yarbrough that he would like to speak to him about this matter as soon as possible. Yarbrough said that he did not have a problem speaking with Johnson but first needed to get approval from his supervisor.

On October 1, 2015, Yarbrough and Johnson again spoke via telephone where Johnson confirmed the nature of the interview and reason for wanting to speak to Yarbrough. Yarbrough explained that there was a possibility that the attorney/client privilege may be an issue, and he needed to wait for permission from his supervisors to speak to the OIG. Yarbrough stated that he would cooperate with the investigation if granted approval. Johnson explained to Yarbrough that when he was given approval to speak with the OIG, he should bring all emails and documentation related to the PII breach involving Bloodworth. Yarbrough said that he understood and would place them all on a disc.

On October 7, 2015, ASAC Fallen and SA Johnson interviewed Yarbrough. After identifying themselves, they informed Yarbrough that the interview would be recorded. Reference is made to the audio recording of this interview, which was captured using a Sony ICD-SX712 digital recorder. The audio was subsequently transferred to a compact disc. Yarbrough said that he understood.

Yarbrough advised that he drafted and proposed multiple versions of the advice that was ultimately provided to Director Thompson. [REDACTED]

[REDACTED] Yarbrough stated that he was not permitted to provide advice to Director Thompson in writing; rather, he advised her orally. At the beginning of the interview, Yarbrough provided us with two discs, one containing counseling reports for approximately a dozen complainants within the Virtual CREO database, as well as all emails and/or documentation that he had relating to this matter. Both discs were copied and on October 8, 2015, I returned the original disc with the individuals/complaints listed within the Virtual CREO database to Yarbrough. The second disc, identifying all the emails and documents Yarbrough had with respect to the breach, has been outlined and summarized [REDACTED]

Yarbrough said he was assigned to handle the matter related to the OCREO breach by his supervisor, OGC Attorney Jerry Albanese in December of 2013. Yarbrough said at the time, however, he was aware of Bloodworth because he represented the agency in a couple of her EEO complaints. Yarbrough further said that OGC Attorneys Chris Harris (Deputy Regional Chief) and Natalie Liem (Assistant Regional Counsel) advised on Bloodworth's removal and disciplinary proceedings. Yarbrough said that the first meeting to discuss the breach was held in either late December 2013 or early January 2014. Yarbrough stated that he, Harris, Liem, OGC Attorney Dana Myers (Assistant Regional Counsel), and his supervisor, Jerry Albanese, Branch Chief, were all present at that first meeting. According to Yarbrough, the discussion centered on whether, in fact, there was a breach and if so, which division would make notifications to the individuals who filed complaints in the Virtual CREO database.

Yarbrough said that after they had a chance to review the facts of the case, as well as the relevant AIMS, a second meeting was held. Yarbrough advised that the second meeting to discuss the breach was held in early January of 2014. Yarbrough said that Regional Chief Counsel Mary Ann Sloan, Regional Chief Dennis Williams (Retired), Dana Myers, and Branch Chief Albanese also attended. Yarbrough said they spent the bulk of the meeting briefing Sloan and Williams on the case. Yarbrough said their initial review of AIMS indicated that if a breach occurred, they should advise the unit where the breach occurred. Yarbrough stated that since the breach involved the Virtual CREO database, they needed to advise the Regional Commissioner, via Director Thompson. Yarbrough said that since it was a "regional CREO database, housed on a regional website" he and other OGC attorneys believed that OCREO would make the necessary notifications. Yarbrough continued that it was OGC's role to advise OCREO whether notifications were required.

Yarbrough advised that OGC's determination hinged on the fact that the breach did not extend "outside of the agency." While Bloodworth admitted that she shared PII with two coworkers, OGC concluded that because the PII never left the agency, notifications were not required under AIMS. Yarbrough stated that he "cannot recall" who in OGC made the final decision to advise against notifications.

Yarbrough also stated that the handling of Bloodworth's removal action is beyond his scope of his knowledge. He advised that he does not know why specific charges or specifications were removed from the removal notice, but he noted that even if he knew, he would need approval to discuss it further because discussing it may violate attorney-client privilege. Yarbrough reiterated that he only had permission to discuss the PII breach.

Yarbrough stated that their analysis of the PII breach failed to reveal any evidence that Bloodworth accessed the Virtual CREO database beginning in 2008. Yarbrough further stated

that there was no proof that she ever used any of the PII for any reason other than to "show her two colleagues and "have a laugh about it." He stated that another element that factored into the analysis was the fact that by virtue of their positions, the three individuals who had access to the EEO database also had access to very sensitive information collected on members of the general public, and there was no evidence that any of them ever misappropriated any of the information. For this reason, Yarbrough advised, they concluded that there was a low risk that Bloodworth and the others would misuse the information they obtained from the Virtual CREO database.

Yarbrough said another element OGC evaluated prior to advising OCREO and Director Thompson was the fact that the Virtual CREO database was disabled and all the PII that Bloodworth had taken was confiscated from her workstation during the desk audit. Yarbrough said that OGC did not have any evidence that the database was misused in the past, and likewise, OGC concluded that the risk of future misuse was low. Yarbrough stated that these elements were the primary considerations that led OGC to conclude that notifications were not required by AIMS.

Yarbrough stated that he was not aware of Nolan advising Craighead that Bloodworth encouraged Nolan to file a false complaint against ODAR management.

Yarbrough also stated that he does not recall anyone advocating that notifications be made. In fact, Yarbrough said that OCREO Director Thompson sent an email indicating that a breach notification should not be made. This email is included on the disc that Yarbrough provided to OIG. Yarbrough said that Thompson's position was considered when OGC rendered its advice.

Yarbrough said that he believed that the AIMS covers notifications with respect to the Privacy Act, as well as PII breach notifications. Yarbrough said OGC ultimately decided that AIMS did not require notification on the facts presented.

Yarbrough said that he believes the first draft of his memo regarding the breach notification indicated that notification was not necessary. The draft was revised six or seven times, and by April 2014, the final draft was provided to Dennis Williams, who never signed it. Yarbrough does not know why Williams never signed the final draft, but he noted that Williams is very detail-oriented and took his time reviewing the memo. Williams has since retired. Yarbrough said that although the final version of the memo was eventually approved and everyone agreed with the decision, OGC decided not to provide the written memorandum to Thompson but rather to advise her only orally.

Yarbrough stated that OGC's advice to Thompson "was a close call for us" as "there wasn't much in the way of a smoking gun on either side." Yarbrough said he feels they (OGC) did the

best they could with the information they had at the time. Yarbrough surmised that even with more information, he is not sure he would conclude otherwise.

William Randall Interview

On October 13, 2015, SAs Johnson and Martin conducted a telephonic interview of ODAR Group Supervisor William Randall, Atlanta North Office [REDACTED]. Prior to any questioning the agents notified Randall of the voluntary nature of the interview. Randall said that he understood and wished to continue. Randall said that he has "possible proposed action" pending against him, which he received on September 28, 2015, and he believes it is because he has been vocal about certain issues, especially the Virtual CREO breach. Randall continued that because he and the other managers (Allen, Moretti, Craighead) have been so outspoken about the breach, it will now "negatively impact them as a group." Randall still feels like they are "doing the right thing, but from an individual standpoint, it is "not enhancing [his] career."

Randall said although four complaints were filed against him in the "EEO database," "nothing came of the complaints." Randall advised that this is another reason he is very concerned about the breach and the consequences of the breach.

Randall said that he and the other ODAR managers made the initial report of the PII breach through their chain of command and no notifications were made. Randall said that he feels that the way the breach was handled "lacked transparency" and that those individuals whose records were in the database are the "most vulnerable people inside our agency." He stated that the breach exposed so many issues, as well as the agency's "dirty laundry." Randall feels that the individual complainants and others identified in the database deserve to be notified. Randall reiterated his fear of retaliation.

Adrienne Bloodworth Interview

On October 23, 2015, SAs Johnson and Martin interviewed Adrienne Bloodworth [REDACTED]. Bloodworth's daughter, Kareema Goodman, was also present during the interview. Goodman is a contract verbatim hearing recorder (VHR) with the SSA in the Atlanta North Office, ODAR. Prior to questioning, agents explained the voluntary nature of the interview to Bloodworth. Bloodworth said that she understood and agreed to continue. Bloodworth stated that she is on several medications; however, none prevented her from being truthful during the interview.

Bloodworth said that she was a Contact Representative with SSA prior to being terminated in 2013. Bloodworth said she started with the ODAR as a Contact Representative in 2009 in

Atlanta. Bloodworth said that she worked in the Regional Office from 1998 through 2006, then worked in the Raleigh, North Carolina from 2006 through 2009. Bloodworth said that she experienced sexual harassment while working in Raleigh, North Carolina, so she transferred to the Atlanta North ODAR office. Bloodworth said she was then assigned to the Atlanta North ODAR office in approximately 2009, where she worked until 2013 when she was terminated.

Bloodworth said Tiffany Richardson, also known as Tiffany Thompson, approached her first about the Virtual CREO database. According to Bloodworth, Richardson was the first to pass along the intranet link to her and showed her how to type various "short cuts." Bloodworth said that she typed in the "short cut" or the name "Michael Henderson" to gain access to the database. According to Bloodworth, typing in the name "Marilyn Thompson" would also secure access to the CREO database. Bloodworth claims that not everyone's page was set up the same but she was able to gain access by typing in the name "Michael Henderson." Bloodworth said she could see all complaints in the database, including her own. Bloodworth said that she could "see everything" within the CREO database.

Bloodworth said she believes she was able to view all complaints in the database when she first accessed the CREO database in 2011. Bloodworth said that she initially thought that all complainants would have access to all complaints in the database, an opinion that would later change. Bloodworth stated that she is a "very civil rights person," so she wanted to see everything in the database. Bloodworth said that she also felt the need to act as her own attorney and build her own case. Bloodworth claims that she did not think she was violating any SSA policies by accessing the records maintained in the CREO database.

Regarding the nine individual's reports/complaints that were found on her desk during the desk audit, Bloodworth stated that she is not sure if any of the individuals were contacted about the breach. However, Bloodworth's daughter, Kareema Goodman said that she knows that one of the individuals has not been contacted. Goodman continued by saying that Priscilla Turner is her friend and she knows that she has never been contacted. Goodman further stated that her mother was acting like a paralegal in building her case, and she was reviewing cases similar to her own when she reviewed Priscilla Turner's complaint.

Bloodworth claims she never took home any of the EEO complaints or any PII from the Virtual CREO database.

Bloodworth said that once she gained access to the site she could "filter" through the complaints by the "type" of complaint.

Bloodworth said that on one occasion she called the police on Craighead because he stood above her when he disciplined her. Bloodworth claims that she called the police on Craighead because he raised his voice at her in front of her peers.

Bloodworth said that she also made a complaint to management about one of her supervisors, Celeste Moretti, because Moretti allegedly had personal mail sent to the government work address in violation of agency policy.

Goodman said that immediately prior to her mother being terminated by SSA, she was hospitalized in a mental facility for about a week because of job-related stress.

Bloodworth said that she does not think she is at fault, but the person who developed the software should also be responsible for the PII breach. Goodman said that she believes that Director Thompson is responsible because Thompson has lied on several occasions about the breach. Goodman stated that Thompson sent out an email saying that no one had access to the site when "that is a lie." Goodman further stated that she believes that Thompson should have acknowledged that OCREO had a problem years ago and addressed the problem so that OIG would not have to deal with this issue now and work on a two-year investigation.

Bloodworth claims that she was the "guinea-pig," because others in the office also had access to the CREO database. Bloodworth said that she feels as though she was "targeted" and does not know why other SSA employees were not investigated.

Bloodworth said that she did not take any PII home and did not release any information to the public or to anyone else. Both Bloodworth and Goodman said that the PII never left the Atlanta North ODAR office. Bloodworth held firm that she only accessed the site or printed out complaints to use in drafting her own complaints. Bloodworth said that she was "fed-up" representing herself and was looking for an attorney. Bloodworth said that she was simply "building her own case."

On October 27, 2015, OIG checked the National Criminal Information Center (NCIC) and confirmed that Adrienne Bloodworth has no identifiable criminal history to date.

Conclusion

The OIG investigation substantiated Moretti's claim. The investigation revealed that: (1) SSA Region 4 Management was aware that Adrienne Bloodworth accessed the OCREO database multiple times via internal security vulnerabilities; (2) Region 4 Management concluded that the incident was not a reportable breach as defined by the Administrative Instructions Manual

System; and (3) none of the complainants or other persons whose PII was compromised was notified.

