DEPARTMENT OF THE ARMY
OFFICE OF THE ASSISTANT SECRETARY
ACQUISITION, LOGISTICS, AND TECHNOLOGY
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WASHINGTON, DC 20310-0111

September 11, 2025

Mr. Charles N. Baldis
U.S. Office of Special Counsel
1730 M Street, N.W. Suite 300
Washington, D.C. 20036-4505

SUBJECT: Whistleblower Investigation- Alleged conduct that may constitute a substantial and specific danger to public safety at Corpus Christi Army Depot (Office of Special Counsel File Number DI-25-000095)

Dear Mr. Baldis:

In accordance with Title 5, United States Code, Sections 1213(c) and (d), the enclosed report is submitted in response to the Special Counsel's letter of November 22, 2024, referring a whistleblower disclosure for investigation. The Secretary of the Army has delegated to me his authority, as Agency head, to review, sign, and submit to you the statutorily required report.

The Department of the Army takes very seriously its responsibility to address, in a timely and thorough fashion, matters referred by OSC. In this case, the Army conducted a thorough and comprehensive investigation in response to the OSC's referral of the allegation submitted by the whistleblower, [redacted] who alleged that mechanics within the Corpus Christi Army Depot (CCAD), Engines Division failed to conform with the Depot Maintenance Work Requirements (DMWR) with respect to the use of the Depot's precision measurement recording tool. [redacted] also raised concerns about the revocation of his access to the CCAD's engine safety portal after he reported foreign object debris (FOD) prevention violations.

[redacted] was interviewed during the investigation on January 17, 2025, and afforded the opportunity to further clarify the allegation referred by OSC. He provided a sworn statement and other documentary evidence related to his allegation. After interviewing 7 witnesses, to include [redacted] and reviewing documentary evidence, the investigating officer (IO) found that [redacted] allegation concerning the use of the precision measurement recording tool is substantiated, but found no evidence of a violation of law, rule, or regulation with respect to the revocation of [redacted] access to the safety portal.

The IO substantiated an incorrect entry on the calibration of the digital caliper, a measuring tool used in the inspection process which resulted data entries by shop floor mechanics that were inconsistent with the measuring tool readings. The IO further determined that [redacted] and a coworker appropriately reported this error when they observed it and immediate corrective actions were implemented. The IO recommended additional remedial and preventative actions which are ongoing.

With respect to [redacted] concerns about the revocation of his access to the engine safety portal, the IO determined that [redacted] portal access was revoked to maintain consistency with other employees. Further, the IO found the engine safety portal is no longer in use and that [redacted] ability to report violations was not curtailed, but rather he is required to use the previously established, official reporting method.

I am satisfied that the IO's conclusions and recommendations constitute an appropriate outcome in this matter. This report is submitted in satisfaction of my responsibilities under Title 5 U.S.C. §§1213(c) and (d). Please direct any further questions you may have concerning this matter to Mr. Joseph A. Fedorko, Office of The Army General Counsel, at 703-693-3668.

Sincerely,

Jesse D. Tolleson

Jesse D. Tolleson, Jr.,
Acting

SUMMARY OF THE REPORT OF THE INVESTIGATION

I. INFORMATION INITIATING THE INVESTIGATION

By correspondence dated November 22, 2024, the Office of Special Counsel (OSC) forwarded to the Secretary of the Army allegations from a named whistleblower, a Quality Control Inspector within the Quality Control Division, Engine/Hydraulic Branch at the Corpus Christi Army Depot (CCAD) in Corpus Christi, Texas, that employees had engaged in conduct that may constitute a violation of law, rule, or regulation; gross mismanagement; an abuse of authority; and a substantial and specific danger to public safety.

Specifically, the whistleblower alleged that mechanics in the Engines Division repeatedly did not appear to conform with the Depot Maintenance Work Requirements (DMWR) during his rotational assignment in the Division's Compressor Gas Generator Rotor Branch (GG Rotor Shop). The whistleblower alleged that mechanics in the Engines Division of CCAD did not conform to DMWR because they improperly used CCAD's precision measurement recording tool and appeared to have entered fraudulent and/or inaccurate numbers in CCAD's records management system, known as the Complex Assembly Manufacturing Solution (CAMS). The whistleblower explained that the CCAD precision measurement recording tool (Serial No. ST2121CM) only records measurements to ten-thousandths of an inch (0.0000 or 0.0005), but mechanics repeatedly recorded measurements in CAMS ending in other numbers.

Additionally, the whistleblower expressed concern that during his subsequent assignment to the T700 Assembly Branch (inspectors such as the whistleblower supporting engine production at CCAD typically rotate every six months), he reported numerous violations of local CCAD regulations covering Foreign Object Debris (FOD). The whistleblower previously used the T700 engines safety portal to report such violations, but management revoked his access to the portal. The whistleblower appears to believe that he and other inspectors can no longer report FOD violations because of a lack of access to the portal.

II. CONDUCT OF THE INVESTIGATION

On December 9, 2024, the Office of the Army General Counsel forwarded the OSC referral to the Commander, U.S. Army Aviation and Missile Command (AMCOM) for appropriate action, including the initiation of an investigation into the allegations pursuant to Army Regulation (AR) 15-6, Procedures for Investigating Officers and Boards of Officers. On December 11, 2024, the AMCOM Commander delegated the authority to conduct the investigation to the CCAD Commander.

On January 8, 2025, the CCAD Commander appointed an Investigating Officer (IO) to conduct the AR 15-6 investigation and to prepare the draft Army report addressing the allegations made by the whistleblower to the OSC and to make findings whether any wrongdoing occurred, and if so, by whom, and whether adequate policies and procedures are in place to preclude any recurrence of any improprieties, irregularities, or misconduct. Including the whistleblower, the IO interviewed seven (7) people, including follow up questions as needed, and reviewed several gigabytes of emails and data files.

The IO commenced his investigation on January 15, 2025 and completed the investigation on March 13, 2025, with the IO's final report submitted to the CCAD Commander on July 2, 2025. On July 15, 2025, the CCAD Commander reviewed and approved the IO's report. Three (3) extensions were granted to the investigation due to the extensive amount of work required.

III. ORGANIZATION AND MISSION

CCAD plays a critical role in sustaining the nation's Organic Industrial Base (OIB) by performing ongoing aviation repair and remanufacturing operations, both at its home station and in deployed environments, in support of national defense objectives. As the primary overhaul facility for the U.S. Army's rotary-wing aircraft and associated components, including the AH-64 Apache, CH-47 Chinook, and UH-60 Black Hawk, CCAD is responsible for ensuring the readiness and reliability of these vital assets. The depot operates under the auspices of the U.S. Army Aviation and Missile Command (AMCOM), which in turn reports to the U.S. Army Materiel Command (AMC).

CCAD possesses specialized expertise in the comprehensive teardown and overhaul of complex components, including transmissions, engines, flight controls, and avionics systems. The production operations are organized into multiple specialized shops, each focused on distinct phases of the overhaul process. The overhaul process commences with a pre-shop analysis (PSA) and examination and evaluation (E&E) phase, during which components are disassembled and subjected to rigorous inspection. Following this initial assessment, components are routed to designated repair shops as necessary, based on the findings of the preceding inspection. Repairs are then performed in accordance with the stringent guidelines and procedures outlined in the DMWR manual, which serves as the U.S. Army's maintenance standard. Upon completion of repairs, components are reassembled and tested to ensure compliance with established standards. Finally, the overhauled components are preserved, packaged, and stored in a controlled environment, pending shipment to their designated destinations.

IV. APPLICABLE RULES, REGULATIONS, AND POLICIES

1. Army Regulation (AR) 15-6, Procedures for Administrative Investigations and Boards of Officers.

2. Corpus Christi Army Depot Regulation 702-35, Corrective Action Program.

3. Corpus Christi Army Depot Regulation 350-13, Technical Training Record Management and Maintenance

4. Army Regulation (AR) 385-10, Army Safety and Occupational Health Program.

5. US Army Materiel Command (AMC) Regulation 385-10, AMC Safety Program.

6. US Army Aviation and Missile Command (AMCOM) Regulation 385-10, AMCOM Safety Program.

7. DA PAM 385-30, Risk Management, CCAD Safety Program.

8. Corpus Christi Army Depot Regulation 385-40, CCAD Safety Program.

9. Corpus Christi Army Depot Directorate of Engine Production Safety Program Standard Operating Procedure 385-EP-145.

10. Army Regulation 70-62, Airworthiness of Aircraft Systems.

V. FINDINGS

A. OSC REFERRED ALLEGATION 1: The whistleblower alleged that CCAD Engines Division mechanics repeatedly failed to conform with DMWR, by improperly using CCAD's precision measurement recording tool.

The IO determined that the whistleblower's allegation regarding CCAD Engines Division mechanics repeatedly failing to conform with DMWR through the improper use of the precision measurement recording tool was **substantiated**.

By way of background, CCAD employs a comprehensive planning system, utilizing individual plans known as Complex Automated Production Planning (CAPP) plans, to govern the processing of each component and subcomponent. These CAPP plans are stored and maintained within the CAMS, ensuring that all overhaul processes are meticulously documented and adhered to. Each CAPP plan is tailored to ensure full compliance with the requirements outlined in the DMWR, and typically consists of a series of standardized procedures, including inspection, repair, testing, and preservation, with variations incorporated as necessary.

The CAPP plan for the second-stage nozzle segment at the time the allegations were reported required the measurement of diameter A to be recorded. The DMWR specifies a minimum diameter requirement of 0.1922 inches for this component. The tool used to measure the diameter was a Brown & Sharpe DIGIT-CAL MK IV digital caliper with a CCAD serial number of ST2121CM. Although this digital caliper is capable of reading measurements to the ten-thousandth place, it is limited to 0.0005-inch graduations, resulting in a display of only "0" or "5" as the final digit. The DMWR's minimum diameter limit of the second-stage nozzle segment necessitates an accuracy of 0.0001-inch, which exceeds the capabilities of the digital caliper used. Note, the DMWR does not prescribe a specific method for measuring the diameter, but rather establishes the minimum diameter requirement, leaving it to the discretion of the overhaul facility to determine the most accurate means of assessment. A digital caliper is a common measuring tool used in aviation maintenance. The use of this tool is not inherently incorrect, but its use needs to match the accuracy and tolerance required.

The whistleblower alleged that during his assignment to the GG Rotor Shop, he and Witness #1, also a Quality Control Inspector, discovered an anomaly while conducting a quality inspection of paperwork for a T700 second-stage nozzle segment on 19 August 2024. According to the whistleblower, the issue was caused by an incorrect measurement entry for the segment bolt hole, which required four significant digits (0.XXXX) but only had three (3) significant digits (0.XXX) recorded. Witness #1 attributed the finding to an incorrect entry on the calibration of the digital caliper measuring tool used in the inspection process. The statements from the whistleblower and Witness #1 differ in how the anomaly was found, but both have validated that the caliper used can only measure in graduations of 0.0005 inch and that their review of shop floor mechanics' entries into CAMS were not consistent with the measuring tool readings.

The whistleblower and Witness #1 contacted their supervisor, Witness #2. Witness #1 also reported his findings to the GG Rotor Shop supervisor, Witness #3, and to a work leader in the GG Rotor Shop who removed CCAD's precision measurement recording tool from the shop. Witness #1 also issued a Non-Conformance Report (NCR) to document the findings and to initiate corrective actions.

The IO determined that, at that time, individual attempts to track the frequency of caliper usage and inspect engine parts were made initially, but no formal investigation was requested. Instead, the GG Rotor Shop and directorate focused on addressing the second-stage nozzle segment issue through an internal review, holding daily meetings to discuss corrective actions. The above-mentioned NCR prompted the GG Rotor Shop supervisor, Witness #3, to submit a self-Corrected Action Request (CAR) (using CCAD Form 5196-E) on

30 August 2024. This CAR initially identified the incorrect use of tools and erroneous entries but was later revised to include additional corrective measures. The review process also resulted in additional NCRs being identified, which were subsequently addressed in the form of corrective actions.

The corrective actions taken between August 30 and November 19, 2024, included the GG Rotor Shop supervisor, Witness #3, conducting a Reoccurring Qualification Assessment (RQA) on mechanics/artisans as well as reviewing and updating the shop procedures, with findings documented on the CCAD Internal Audit Checklist (CCAD Form 5673-E). To ensure compliance, engine production leadership brought in experienced personnel comprised of seasoned mechanics/evaluators to conduct an "over-the-shoulder" review of shop mechanics/artisans performing measurements on all production assets over a three-week (3-week) period starting on August 30, 2024. No disciplinary actions were taken against individual employees.

The IO further found that a separate and previously scheduled Systems Readiness Directorate (SRD) investigation revealed that the mechanics/artisans were using new bolts to inspect bolt holes for a proper fit; however, this was determined to be an improper inspection method, despite the assessed low airworthiness impact. SRD has been delegated airworthiness authority by the AMCOM Commanding General. This authority allows SRD, as the engineering support activity, to ensure airworthiness of U.S. Army aircraft and their subsystems.[1]

In response to SRD's findings, the second corrective action taken by Witness #3 was to revise the measurement process for the second-stage nozzle segment bolt hole to utilize "go/no go" gauges for verifying the minimum bolt hole diameter, rather than relying on caliper measurements. This change was also incorporated into the Computer Automated Production Planning (CAPP) plan within the CAMS.

The IO concluded that these "immediate corrective actions … fully addressed the issue and prevented recurrence."

Contemporaneous with the aforementioned NCR which prompted the corrective actions described above, the whistleblower contacted the Inspector General (IG) assigned to the U.S. Army Aviation and Missile Command (AMCOM). This resulted in communications between the AMCOM IG and the whistleblower between August 19, 2024 and August 29, 2024, during which the whistleblower identified additional concerns with the caliper being used on other engine components. Subsequently, the AMCOM IG contacted CCAD leadership on or about August 24, 2024 for additional inquiry (informal review), and the

[1] The IO investigating the present whistleblower compliant coincidentally happens to also run the SRD engineering investigations at the CCAD facility, but the SRD investigation mentioned here was initiated prior to, and independent of, the present whistleblower complaint.

Depot Production Manager, Witness #4, was assigned to provide that information to the AMCOM IG.

Witness #4 focused on the second-stage nozzle segment and the corrective actions taken by the Directorate of Engine Production (DEP), under the initiative and leadership of Witness #3. Witness #4 also provided the AMCOM IG with data related to these actions, specifically including the forementioned updates to the CAPP plan and the procurement of "go/no-go" gauges to verify component conformance. No inquiries were made about the allegations of fraudulent entries, and the whistleblower was not interviewed as part of Witness #4's informal investigation triggered by the AMCOM IG inquiry.

Upon review, the IO concluded that the AMCOM IG investigation was limited only to the second-stage nozzle segment and the corrective actions that CCAD had implemented. The IO further observed that both the AMCOM IG and CCAD leadership did not perform a "deep dive" analysis of any additional components that were measured using the digital caliper having the Serial Number ST2121CM. Accordingly, a data collection request was submitted for CAMS information to identify all instances of digital caliper ST2121CM usage for measurement purposes since 2019. In response, CCAD's Quality Assurance group provided a spreadsheet listing twenty-one (21) unique engine components, including the second-stage nozzle segment. Notably, fourteen (14) of these components are designated as Critical Safety Items (CSI).

B. OSC REFERRED ALLEGATION 2: The whistleblower alleged that he had reported numerous violations of CCAD regulations on foreign object debris and instances of dangerous workmanship and that he has repeatedly used the T700 engine safety portal to report such violations. However, the whistleblower asserts management recently revoked his access to the portal.

When interviewed by the IO, the whistleblower recounted that he had reported numerous violations of CCAD regulations on foreign object debris and instances of dangerous workmanship and that he has repeatedly used the T700 engine safety portal to report such violations. The whistleblower expressed concern about the revocation of his access to the portal. The IO found no evidence of a violation of law, rule or regulation with respect to the revocation of the whistleblower's access to the portal.

The IO determined that after the whistleblower left his rotation at the GG Rotor shop and began working at the T700 Assembly Branch, the whistleblower identified several FOD Prevention violations. The whistleblower initially reported these issues to Witness #5, who was the Unit Safety Officer in the DEP. According to the whistleblower's statement, Witness #5 advised that these violations should be reported through the DEP Safety Portal, which was established as an internal tool for DEP to manage policy and procedure responsibilities in accordance with Army Regulation (AR) 385-10, US Army Aviation and Missile Command (AMCOM) Regulation 385-10, DA PAM 385-30 (Risk Management), and CCAD Regulation

385-40. CCAD DEP Safety Program Standard Operating Procedure (SOP) 385-EP-145 similarly outlines roles and responsibilities for identifying, tracking, and resolving safety issues and violations; however, the CCAD DEP Safety Program SOP does not specify access standards for the portal.

The whistleblower submitted an access request to Witness #5 via the portal and Witness #5 coordinated with the DEP Director recommending that the whistleblower be given a trial period of access. His access was approved, however after two to three months, the whistleblower discovered that his access had been revoked. The whistleblower explained to the IO that, when he inquired, Witness #5 informed him the revocation stemmed from a Powertrain Transmission Assembly supervisor complaining that he did not have access to the portal when the whistleblower, a Quality Control Inspector, had access. When interviewed by the IO, Witness #5 did not specifically recall the reason for the revocation, but she did state that she had confirmed with the DEP Director before removing the whistleblower's portal access. The IO found revocation of the whistleblower's portal access was revoked to maintain consistency with other employees.

The whistleblower's supervisor, Witness #2, was unaware that the whistleblower had been given access to the portal in the first place, and when Witness #2 was questioned about FOD violations, Witness #2 stated that Quality Control Inspectors can issue NCRs and can escalate the violations to Corrective Action Requests (CARs) for the shop supervisor in cases of recurring violations. According to the IO, "Non-Conformance Reports (NCRs) remain the established and official method for reporting FOD concerns." In short, the whistleblower's ability to report FOD violations was not curtailed but, rather, required under pre-existing SOP to go through a different, previously established communication channel after his trial period of portal access was revoked.

VI. INVESTIGATING OFFICER'S RECOMMENDATIONS

Based on his findings, the IO recommended that:

a. **Initiate Mandatory Annual Training For All Shop Mechanics.** The IO recommended that all shop mechanics should receive annual training on precision measurement to enhance quality and ensure compliance with aviation standards. This training should be tracked and established as a recurring requirement, as precision measurement is fundamental to product quality acceptance. This training should include Geometric Dimensioning and Tolerancing (GD&T) to provide a standardized system for defining and communicating engineering tolerances, enabling mechanics to fully understand the requirements outlines in the DMWR and Original Equipment Manufacturer (OEM) blueprints.

b. **Adopt New Specifications For Hole Diameter (Specifying Minimum and Maximum Diameters).** The IO recommended that CCAD stop using "minimum hole diameter" because this limit is ambiguous and does not define the acceptable range because it does not have a corresponding maximum hole diameter. Instead, the IO recommended that a minimum and maximum hole diameter be specified to ensure that both undersized and oversized bolt holes fail inspection, thereby improving the product quality during overhaul. The SRD has issued a Maintenance Engineering Order against the DMWR to update the requirement.

c. **Convene A Material Review Board To Review Past Actions**. The IO obtained data on all instances in which digital caliper with Serial Number ST2121CM was used for measurement purposes since 2019. CCAD's Quality Assurance group identified twenty-one (21) unique engine components, of which fourteen (14) were designated as Critical Safety Items (CSI). The IO recommended that CCAD convene a Material Review Board (MRB) to examine twenty (20) components and to determine whether improper measurement techniques were utilized and whether there were any quality escapes.

VII. APPROVING AUTHORITY'S ACTIONS

On July 15, 2025, the CCAD Commander reviewed the investigation and approved the IO's findings and recommendations without further commentary or instructions.