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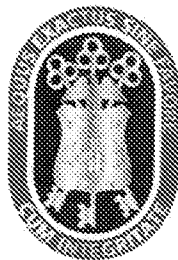
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**INSPECTION DIVISION
EXTERNAL AUDIT AND COMPLIANCE SECTION**



COMPLIANCE AND MITIGATION UNIT REPORT

**2019 DOMESTIC INVESTIGATIONS AND
OPERATIONS GUIDE AUDIT
10/21/2019 – 11/01/2019**




 01/10/2020
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Inspection Division

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I. SCOPE AND METHODOLOGY

Synopsis

(U//~~FOUO~~) The Inspection Division (INSD), Compliance and Mitigation Unit (CAMU), conducted an audit to assess compliance with relevant policies and procedures in the areas of Sensitive Investigative Matters (SIMs), Assistance to Other Agencies-State, Local, and Tribal, and Administrative/Control Files. The audit team reviewed 1,420 randomly selected cases pending during 01/01/2018 - 06/30/2019. The Domestic Investigations and Operations Guide (DIOG)¹ governed the requirements and authorities for the case files reviewed.

Background

(U//~~FOUO~~) INSD in coordination with the Office of Integrity and Compliance (OIC), the Internal Policy Office (IPO), and Office of General Counsel (OGC) assessed risk associated with SIMs, Assistance to Other Agencies - State, Local, and Tribal, and Administrative/Control Files. Each were selected for the audit based on a review of field office self-identified non-compliance ECs, an internal review of certain sections of the DIOG, and areas not previously audited. The INSD oversight role, as set forth in the DIOG² stated, "DOJ and the FBI's Inspection Division, and the FBI's OIC and OGC, also provide substantial monitoring and guidance."

Identification of Sample

(U//~~FOUO~~) A representative sampling of 1,420 cases pending during 01/01/2018 - 06/30/2019 were randomly selected from a total of 24,584.

TABLE 1: DIOG Sample

Audit Category	Case File Population	Cases Audited for Instances of Non-Compliance
Sensitive Investigative Matters	795	353
Assistance to Other Agencies - State, Local, and Tribal	1,138	420
Administrative/Control Files	22,651	647
Total	24,584	1,420

Methodology

(U//~~FOUO~~) From 10/21/2019 through 11/01/2019, a team of 11 Assistant Inspectors-in-Place (AIIPs), two SSAs from the OIC, and one contractor from IPO conducted the audit under the direction of the INSD SC, the CAMU UC, and a Lead/Co-Lead MAPA. Each AIIP completed a

¹ DIOG, 0667DPG, released 03/03/2016 updated 09/28/2016 and released 07/23/2018 and updated 06/11/2019.

² DIOG, Section 4.1.3.

questionnaire (Appendix C) to assess compliance with the DIOG. The questionnaires were completed on the DIOG Audit SharePoint site. AIIPs also documented compliance errors on a hard copy which was used in the compliance review process.

(U//~~FOUO~~) A three step review process was used, during the DIOG audit, to identify any instances of non-compliance. The first step was identification of the potential compliance error by the AIIP. In the second step, the AIIP reviewed the potential compliance error with the IPO and OIC representatives to confirm the correct interpretation and application of the DIOG. The final step was conducted by the UC or SC to discuss any concerns with IPO and OGC and to provide concurrence with the final results. All compliance errors documented during the audit went through the three steps described above.

II. COMPLIANCE

(U//~~FOUO~~) An audit of 1,420 cases resulted in 997 non-compliance errors. Of the 997 non-compliance errors, 747 (75%) were associated with SIMs, 131 (13%) with Assistance to Other Agencies - State, Local, and Tribal, and 119 (12%) with Administrative/Control Files.

TABLE 2: DIOG Non-Compliance

Audit Category	Cases Audited for Instances of Non-compliance	Compliance Errors
Sensitive Investigative Matters	353	747
Assistance to Other Agencies - State, Local, and Tribal	420	131
Administrative/Control Files	647	119
Total Errors	1,420	997

(U//~~FOUO~~) For all types of compliance errors, the DIOG, Section 2.8.1.1, stated: “*Substantial non-compliance*” means non-compliance that is of significance to the matter and is more than a minor deviation from a DIOG requirement. Non-compliance that relates solely to administrative or peripheral requirements is not substantial.” During the review, all non-compliance errors were reported and analyzed by the OIC to determine whether any further action was required in each particular matter. The OIC confirmed a total of 790 (79%) were substantial non-compliance errors.

A. Sensitive Investigative Matters

(U//~~FOUO~~) A SIM is an investigative matter involving the activities of a domestic public official or domestic political candidate (involving corruption or a threat to the national security), religious or domestic political organization or individual prominent in such an organization, or news media, an academic nexus, or any other matter which, in the judgment of the official

authorizing an investigation, should be brought to the attention of FBIHQ and other DOJ officials.

(U//~~FOUO~~) INSD assessed, pursuant to the DIOG, Sections: 6, 7, and 8, whether SIMs in preliminary, full, and enterprise investigations: documented the review of the CDC; had been approved by the SAC; notified the operational FBIHQ unit within 15 calendar days of the opening; identified the SIM category; included Sensitive Investigative Matter in the case caption; if the field office provided written notification to the USAO within 30 days of opening; if the FBIHQ operational unit notified DOJ in writing within 30 days of receiving notice; had SAC approval at the closing of the investigation; written notice of the closing to the responsible FBIHQ unit; appropriate investigative methods utilized; and was notice provided to the appropriate FBIHQ operational UC for each search warrant served pursuant to a court order or Title-III. INSD reviewed a total of 353 SIM investigations and identified 747 compliance errors.

(U//~~FOUO~~) INSD reviewed 303 Full SIM Investigations (FI) and identified 657 compliance errors. All of the errors were in violation of the DIOG, Section 7.7.1.1.C, unless otherwise noted. The errors are as follows:

- (a) 41 investigations did not document CDC review prior to opening the investigation;
- (b) 35 investigations did not have SAC approval to open the investigation;
- (c) 40 investigations did not notify the FBIHQ operational unit within 15 calendar days of the opening;
- (d) Four investigations did not identify the SIM category in the opening EC;
- (e) [REDACTED]
- (f) 216 investigations did not notify the USAO in writing within 30 days of opening the investigation;
- (g) [REDACTED]
- (h) 33 investigations in which FBIHQ did not notify DOJ of all known SIMs;
- (i) 107 investigations the field office did not state the circumstances for not notifying the USAO in writing to the responsible FBIHQ operational unit;
- (j) [REDACTED]
- (k) [REDACTED]
- (l) [REDACTED]
- (m) Eight investigations in which the SIM was identified after the opening did not provide written notification to the responsible FBIHQ unit;
- (n) 13 investigations in which the SIM was identified after the opening did not provide notification to the USAO or DOJ;
- (o) 68 investigations lacked notification to FBIHQ for each search warrant, Title III, or court order conducted in a SIM (DIOG, Sections 18.7.1.4.C and 18.7.2.12.6);
- (p) One investigation opened by FBIHQ did not document OGC review prior to the opening;
- (q) One investigation opened by FBIHQ did not have Section Chief approval;
- (r) One investigation opened by FBIHQ did not notify the appropriate field office within 15 calendar days of the opening;

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- (s) One investigation opened by FBIHQ did not provide written notice to the USAO within 30 days of the opening;
- (t) One investigation opened by FBIHQ did not state the circumstances for not notifying the USAO in writing to DOJ and the responsible field office:
- (u)
- (v) One investigation opened by FBIHQ did not notify DOJ in writing within 30 calendar days of the opening;
- (w) One investigation opened by FBIHQ did not provide notice to the DOJ Criminal Division of a Title III wiretap (DIOG, Section 18.7.2.12.6);
- (x) Seven investigations did not have the SAC approval on the closing EC (DIOG, Section 7.12.2.C); and
- (y) Three investigations did not provide written notification of the closing to the responsible FBIHQ unit/section (DIOG, Section 7.12.2.C).

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(U//~~FOUO~~) INSD reviewed 48 Preliminary SIM Investigations (PI) and identified 82 compliance errors. All of the errors were in violation of the DIOG, Section 6.7.1.1.C, unless otherwise noted. The errors are as follows:

- (a) Four investigations did not document CDC review prior to opening the investigation;
- (b) Four investigations did not have SAC approval to open the investigation;
- (c) Six investigations did not notify the FBIHQ operational unit within 15 calendar days of the opening;
- (d) 32 investigations in which the field office did not notify the USAO in writing within 30 days of opening the investigation;
- (e) Eight investigations in which FBIHQ did not notify DOJ in writing within 30 calendar days of receiving notice of the SIM from the field office;
- (f) One investigation in which the SIM was identified after the opening was not reviewed by the CDC within five business days of the date the SIM was identified;
- (g) One investigation in which the SIM was identified after the opening did not have written notification to the USAO or DOJ;
- (h) 22 investigations in which the field office did not state the circumstances for not notifying the USAO in writing to the responsible FBIHQ operational unit;
- (i) Two investigations lacked notification to FBIHQ for each search pursuant to a court order conducted in a SIM (DIOG, Sections 18.7.1.4.C and 18.7.2.12.6);
- (j) One investigation did not have SAC approval at the closing of the investigations (DIOG, Section 6.12.2.C); and
- (k) One investigation used investigative methods beyond those authorized in a PI (DIOG, Section 18.6).

(U//~~FOUO~~) INSD reviewed two Enterprise SIM Investigations (EI) and identified eight compliance errors. All of the errors were in violation of the DIOG, Section 8.6.4.1, unless otherwise noted. The errors are as follows:

- (a) One investigation did not have SAC approval to open the investigation;
- (b) One investigation in which FBIHQ did not notify DOJ in writing within 30 calendar days of receiving notice of the SIM from the field office;

- (c) Two investigations in which the field office did not notify the USAO in writing within 30 days of opening the investigation;
- (d) Two investigations in which the field office did not state the circumstances for not notifying the USAO in writing to the responsible FBIHQ operational unit;
- (e) One investigation did not provide the responsible FBIHQ section an LHM for disseminations to DOJ with the opening EC; and
- (f) One investigation lacked notification to FBIHQ for each search pursuant to a court order conducted in a SIM (DIOG, Sections 18.7.1.4.C and 18.7.2.12.6).

(U//~~FOUO~~) INSD determined 526 (70%) of the 747 compliance errors were related to approvals, notifications, and administrative matters. INSD assessed field offices opened and closed SIMs without always including the appropriately designated officials and addressing the other requirements, in accordance with the DIOG, Sections 6, 7, and 8. INSD assessed to mitigate these compliance errors, IPO coordinating with OIC, OGC, ITTAD and appropriate FBIHQ operational Divisions [REDACTED]

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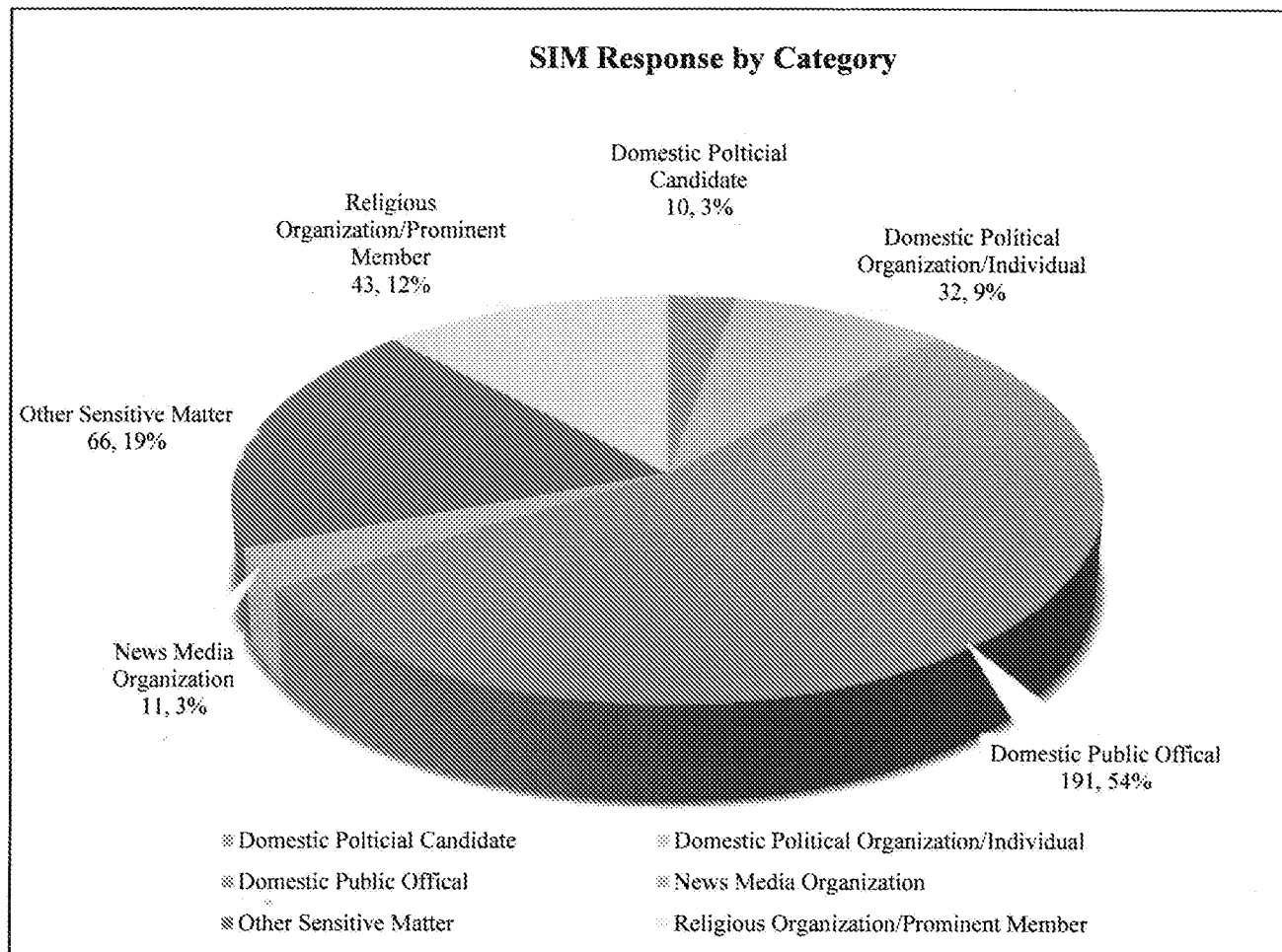
(U//~~FOUO~~) During the review INSD assessed the SIM investigations for the timeliness of investigative activity. Based on the importance and emphasis from FBIHQ on SIM investigations, a review was conducted to determine if there were periods of 90 days or longer with no investigative activity or serial in the main or sub-files with no explanation for the lack of activity. A total of 74 (21%) of the 353 SIM investigations had a lack of investigative activity for periods of 90 days or longer. Of the SIMs 67 (91%) were FIs, 6 (8%) were PIs, and 1 (1%) was an EI.

(U//~~FOUO~~) The audit team reviewed the DIOG Section related to search warrants and specifically the reporting requirement for SIMs. The DIOG, Section 18.7.1.4.C, stated: *"Sensitive Investigative Matters (SIM): Notice to the appropriate FBIHQ operational Unit Chief and Section Chief is required if the matter under investigation is a sensitive investigative matter. Notice to DOJ is also required, as described in DIOG Section 10."* [REDACTED]

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(U//~~FOUO~~) The audit team reviewed the DIOG, Section 10 which is specific to SIM investigations. Section 10 provided background, definitions, and guidance related to SIMs. Section 10 addresses opening and approvals for SIMs, however does not provide details instead referred to the appropriate section in the DIOG for further guidance. There is additional guidance related to Investigative Methods and notifications for SIMs in Section 18, however are not referenced in Section 10 which allows for potential non-compliance. [REDACTED]

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B. Assistance to Other Agencies - State, Local, and Tribal

(U//~~FOUO~~) INSD assessed, pursuant to the DIOG, Section 12.3.2.3, whether: assistance was provided based on federal violations; non-federal violations; if appropriate approval was obtained; and was the required documentation completed.

(U//~~FOUO~~) INSD reviewed 420 cases and identified 222 cases where assistance was actually requested or provided, which contained 131 compliance errors, as follows:

- a) 67 cases lacked the required documentation in an FD-999 or was not documented in a timely manner when investigative assistance using an investigation method, other than those authorized in an assessment was provided (DIOG, Sections 12.5.1 and 12.7.2);
- b) 59 cases lacked the appropriate approvals required to open and provide assistance to state, local, and tribal agencies (DIOG, Sections 12.3.2.3.1.A, 6.7.1.1.B, and 7.7.1.1.B);
- c) Four cases in which the file classification 356E utilized for violent acts and shooting in a

- place of public use was not utilized properly (DIOG, Section 12.3.2.3.B.1); and
- d) One case in which the file classification 184A for investigative assistance pertaining to felony killings of state and local law enforcement officers was not utilized properly (DIOG, Section 12.3.2.3.B.4.).

(U//~~FOUO~~) INSD assessed 194 (46%) of the 420 audited cases classified as Investigation of Certain Non-Federal Violations lacked a request to the FBI from a state or local law enforcement agency. The DIOG, Section 12.3.2.3.B, stated: *"At the request of an appropriate state or local law enforcement official, the FBI is authorized by federal statute to assist in the investigation of the following crimes: 1) Violent acts and shootings occurring in a place of public use... 2) Mass killings... 3) Serial killings... 4) Felony killings of state and local law enforcement officers. 5) Felony crimes of violence against travelers. Prior to conducting any investigative activity under the authority of one of the above listed federal statutes, a predicated investigation must be opened."* [REDACTED]

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(U//~~FOUO~~) The review conducted by INSD [REDACTED]

(U//~~FOUO~~) In several instances, the circumstances articulated in the case opening documentation and subsequent serials indicate a substantive FBI investigation should have been opened versus an assistance case. For instance, long-term task force operations targeting gangs and violent crime were inappropriately worked under assistance case classifications. Similarly, assistance case classifications were used incorrectly to document investigative activity in [REDACTED] Assessment matters wherein no request for investigative assistance had been received by the FBI.

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C. Administrative/Control Files

(U//~~FOUO~~) INSD assessed, pursuant to the DIOG Appendix J, whether: the file designated the letter A for Administrative or C for Control; the file was being utilized for a repository for Unaddressed Work; investigative methods or activities were conducted out of the file; and were action leads set out of the file. INSD reviewed a total of 647 Admin/Control files and identified 119 compliance errors.

(U//~~FOUO~~) INSD reviewed 252 Administrative files and identified 46 compliance errors. All of the errors were in violation of the DIOG, Appendix J.1.4.3 and J.1.4.4. The errors are as follows:

- (a) 33 files did not have the appropriate A letter designation before the Administrative case number to indicate the type of file;

- (b) 10 files had investigative activity conducted out of the Administrative file; and
- (c) Three files had action leads set out of an Administrative file.

(U//~~FOUO~~) INSD reviewed 395 Control files and identified 73 compliance errors. All of the errors were in violation of the DIOG, Appendix J.1.4.3 and J.1.4.4 unless otherwise noted. The errors are as follows:

- (a) 24 files did not have the appropriate C letter designation before the Control case number to indicate the type of file;
- (b) 32 files had investigative activity conducted out of the Control file;
- (c) 13 files had action leads set out of an Control file; and
- (d) Four files were used [REDACTED] for Unaddressed work (DIOG, Appendix J.1.4.5.4).

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(U//~~FOUO~~) INSD reviewed 647 Administrative and Control files and determined 57 (9%) lacked the letter "A" or "C" designation in the file number. Information Technology Applications and Data Division (ITADD) advised Sentinel does not allow for the case ID within the UCFN to be changed once the case is created. Therefore, if the case was converted after opening, opened improperly, or the letter designation did not migrate into Sentinel the case manager was unable to add the letter designator in order to be in compliance with the DIOG. INSD assessed [REDACTED]

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(U//~~FOUO~~) INSD reviewed 252 Administrative files and determined 111 (44%) had no serials in the file since 10/01/2018. In addition, 237 (94%) had no file reviews conducted during the review period of 01/01/2018 - 06/30/2019. INSD reviewed 395 Control files and determined 161 (41%) had no serials in the file since 10/01/2018. In addition, 365 (92%) had no file reviews conducted during the review period of 01/01/2018 - 06/30/2019. [REDACTED]

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III. CONCLUSION

(U//~~FOUO~~) The INSD assessed a representative sample of SIMs, Assistance to Other Agencies-State, Local, and Tribal, and Administrative/Control Files, pending during the review period of 01/01/2018-06/30/2019, to audit instances of potential non-compliance. The sample of 1,420 cases were reviewed for the three identified categories. The audit identified 997 instances of non-compliance of which included 747 for SIMs, 131 for Assistance to Other Agencies-State, Local, and Tribal, and 119 for Administrative and Control files. Of the 997 instances of non-compliance 790 (79%) were considered substantial non-compliance.

IV. OBSERVATIONS AND RECOMMENDATIONS

(U//~~FOUO~~) **Observation 1:** Field Offices failed to have the CDC conduct a review of SIMs prior to opening PIs and FIs or within five business days of the date the SIM was identified, in violation of the DIOG, 0667DPG, dated 09/28/2016 and 07/23/2018.

(U//~~FOUO~~) **Analysis 1:** The DIOG, Section 6.7.1.1.C.1 stated: "*SIM Opened by a Field Office: requires prior Chief Division Counsel (CDC) review and SAC approval, and written notification via EC to the appropriate FBIHQ operational unit with program responsibility within 15 calendar days of the opening.*"

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(U//~~FOUO~~) The DIOG, Section 7.7.1.1.C.1 stated: "*SIM Opened by a Field Office: requires prior Chief Division Counsel (CDC) review, SAC approval, and written notification via EC, to the FBIHQ operational unit with program responsibility within 15 calendar days of the opening.*"

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(U//~~FOUO~~) INSD assessed 45 (13%) of the 353 audited SIMs did not conduct a CDC review prior to opening:

Field Office	File Number	Case Type
Albany		FI
Baltimore		FI
Baltimore		FI
Baltimore		FI
Baltimore		FI
Birmingham		FI
Cleveland		FI
Cleveland		FI
Columbus		PI
Dallas		FI
Dallas		FI
Dallas		FI
Denver	194B-DN-3075887	FI
Detroit		FI
Detroit		FI
Detroit		FI
El Paso		FI
Houston		PI

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b7A -1

b7E -1

Field Office	File Number	Case Type
Houston	194B-HO-2553316	FI
Houston		FI
Kansas City		FI
Los Angeles		FI
Los Angeles	196C-LA-3063761	FI
Louisville		FI
Minneapolis		FI
Mobile		FI
New Orleans		FI
New York		FI
Newark	209B-NK-2955118	FI
Norfolk		PI
Oklahoma City		FI
Oklahoma City		FI
Philadelphia	194C-PH-2379391	FI
Portland		FI
Portland		FI
Saint Louis	282A-SL-3110852	FI
Salt Lake		PI
Salt Lake	194D-SU-3129869	FI
San Antonio		FI
San Diego		FI
San Diego		FI
San Francisco	194B-SF-3073903	FI
San Francisco		FI
Springfield	194B-SI-3008167	FI
Washington		FI

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(U//~~FOUO~~) INSD assessed six (22%) of the 27 cases where the SIM was identified after the investigation was initiated, [REDACTED]

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Field Office	File Number	Case Type
Albuquerque		FI
Chicago		FI
Denver		FI
Sacramento		PI
San Antonio	209A-SA-3022055	FI
Springfield		FI

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b7A -1
b7E -1

(U//~~FOUO~~) **Recommendation 1a:**(U//~~FOUO~~) **Recommendation 1b:**

(U//~~FOUO~~) **Observation 2:** Field offices failed to obtain SAC or ASAC approval to open and close SIMs or within five business days of the date the SIM was identified, in violation of the DIOG, 0667DPG, dated 09/28/2016 and 07/23/2018.

(U//~~FOUO~~) **Analysis 2:** The DIOG, Section 6.7.1.1.C.1 stated: *"SIM Opened by a Field Office: requires prior Chief Division Counsel (CDC) review and SAC approval, and written notification via EC to the appropriate FBIHQ operational unit with program responsibility within 15 calendar days of the opening. If a SIM arises after the opening of a Preliminary Investigation, investigative activity may continue, but the matter must be reviewed by the CDC and approved by the SAC as soon as practicable, but not more than five business days thereafter to continue the investigation."* The DIOG, Section 6.12.2.C stated: *"SIM Opened by a Field Office: Closing a Preliminary Investigation opened by a field office involving a SIM requires approval from the SAC, written notification to the FBIHQ operational unit and section."*

(U//~~FOUO~~) The DIOG, Section 7.7.1.1.C.1 stated: *"SIM Opened by a Field Office: requires prior Chief Division Counsel (CDC) review, SAC approval, and written notification via EC, to the FBIHQ operational unit with program responsibility within 15 calendar days of the opening"*

The DIOG, Section 7.12.2.C stated: *"SIM Opened by a Field Office: Closing a Full Investigation opened by a field office involving a SIM requires approval from the SAC, written notification to the FBIHQ operational unit and section."*

(U//~~FOUO~~) The DIOG, Section 8.6.4.1 stated: *"SIM Opened by a Field Office: requires prior CDC review, SAC approval, and approval from the FBIHQ operational section with program responsibility."* The section was related to the approval required for an EI SIM investigation.

(U//~~FOUO~~) The DIOG, Section 3.5.3.1 stated: *"As used in the DIOG, the term 'delegation' refers to the conveyance of authority to another official (either by position or to a named individual). FBI authority is delegable one supervisory level unless expressly permitted, prohibited, or restricted by law, regulation, or policy. For example, an SAC may delegate his/her authority to approve Sensitive Investigative Matters (SIMs) to an ASAC, but the ASAC cannot further delegate this authority to an SSA."*

(U//~~FOUO~~) INSD assessed 40 (11%) of the 353 SIMs lacked SAC or ASAC approval to open the investigation:

Field Office	File Number	Case Type
Baltimore		FI
Baltimore		FI
Baltimore		FI
Birmingham		FI
Chicago		FI
Cleveland		FI
Cleveland		FI
Cleveland		FI
Columbia		PI
Dallas		FI
Denver	194B-DN-3075887	FI
Denver		FI
Detroit		FI
Detroit		FI
Houston	194B-HO-2553316	FI
Kansas City		FI
Los Angeles	196C-LA-3063761	FI
Louisville		FI
Milwaukee	266I-MW-2969711	FI
Milwaukee		EI
Minneapolis		FI
Mobile		FI
New Orleans		FI
New York		FI
Newark	209B-NK-2955118	FI
Norfolk		PI
Oklahoma City		FI
Philadelphia	194C-PH-2379391	FI
Pittsburgh		FI
Portland		FI
Salt Lake		PI
San Antonio		FI
San Diego		FI
San Diego		FI
San Francisco	194B-SF-3073903	FI
San Francisco		FI
Springfield	194B-SI-3008167	FI
St. Louis	282A-SL-3110852	FI
St. Louis	194D-SL-3065858	PI

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b7A -1
b7E -1

Field Office	File Number	Case Type
Washington		FI

b3 -1
b7E -1

(U//~~FOUO~~) INSD assessed five of the investigations where the SIM was identified after the opening lacked SAC or ASAC approval within five business days of the SIM being identified:

Field Office	File Number	Case Type
Albuquerque		FI
Chicago		FI
Columbia		FI
Denver		FI
San Antonio	209A-SA-3022055	FI

b3 -1
b7A -1
b7E -1

(U//~~FOUO~~) Of the SIMs reviewed which were closed during the review period, eight lacked SAC or ASAC approval to close the investigations:

Field Office	File Number	Case Type
Boston	56E-BS-3007303	FI
Charlotte	194A-CE-3032738	FI
Columbia	194B-CO-3129129	FI
Dallas	194B-DL-2814850	PI
Denver		FI
Milwaukee	266I-MW-2969711	FI
Newark	209B-NK-2955118	FI
Pittsburgh	282A-PG-2379415	FI

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(U//~~FOUO~~) **Recommendation 2a:**

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(U//~~FOUO~~) **Recommendation 2b:**

(U//~~FOUO~~) **Observation 3:** Field offices failed to notify the responsible FBIHQ operational unit in writing within 15 calendar days of the opening of a SIM or where identified after opening, in violation of the DIOG, 0667DPG, dated 09/28/2016 and 07/23/2018.

(U//~~FOUO~~) **Analysis 3:** The DIOG, Section 6.7.1.1.C.1 stated: "*SIM Opened by a Field Office: requires prior Chief Division Counsel (CDC) review and SAC approval, and written notification via EC to the appropriate FBIHQ operational unit with program responsibility within 15 calendar days of the opening.*"

b7E -4

(U//~~FOUO~~) The DIOG, Section 7.7.1.1.C.1 stated: *"SIM Opened by a Field Office: requires prior Chief Division Counsel (CDC) review, SAC approval, and written notification via EC, to the FBIHQ operational unit with program responsibility within 15 calendar days of the opening."*

b7E -4

Written notice must be furnished to the responsible FBIHQ operational unit and to the responsible USAO or DOJ division, if applicable, must identify all known SIMs, and the case caption must be revised to include "Sensitive Investigative Matter."

(U//~~FOUO~~) INSD assessed 46 (13%) of the 353 audited SIM investigations did not document notification of the opening of the SIM to the responsible FBIHQ operational unit within 15 calendar days of the opening:

Field Office	File Number	Case Type
Albany		FI
Albuquerque		FI
Baltimore		FI
Baltimore		FI
Baltimore		PI
Birmingham		FI
Birmingham	194C-BH-2570384	FI
Chicago		FI
Cleveland		FI
Cleveland		FI
Cleveland		PI
Columbia		FI
Columbia	194A-CO-3109226	FI
Dallas		FI
Dallas		FI
Dallas	194C-DL-3122562	FI
Dallas		FI
Dallas		FI
Dallas		FI
Dallas		FI
Dallas		FI
Detroit		FI
Detroit		FI
Houston	194B-HO-2553316	FI

b3 -1
b7A -1
b7E -1

Field Office	File Number	Case Type
Houston		FI
Houston		FI
Houston		PI
Los Angeles		FI
Los Angeles	196C-LA-3063761	FI
Louisville		FI
Memphis		FI
Minneapolis		FI
New Orleans		FI
Oklahoma City		FI
Philadelphia	194C-PH-2885789	FI
Philadelphia		FI
Pittsburgh		FI
Sacramento		FI
Salt Lake City	194C-SU-3081322	FI
Salt Lake City		PI
San Antonio		FI
San Diego		FI
San Francisco		FI
San Juan		FI
Springfield	194B-SI-3008167	FI
Springfield		PI
St. Louis		PI
Washington		FI

b3 -1
b7A -1
b7E -1

(U//~~FOUO~~) INSD assessed eight cases where the SIM was identified after the opening did not document notification of the SIM to the responsible FBIHQ operational unit:

Field Office	File Number	Case Type
Albuquerque		FI
Chicago		FI
Columbia		FI
Louisville		FI
Salt Lake City		FI
San Antonio	209A-SA-3022055	FI
San Antonio		FI
Springfield		FI

b7A -1
b7E -1

(U//~~FOUO~~) Recommendation 3a: [REDACTED]

b5 -1

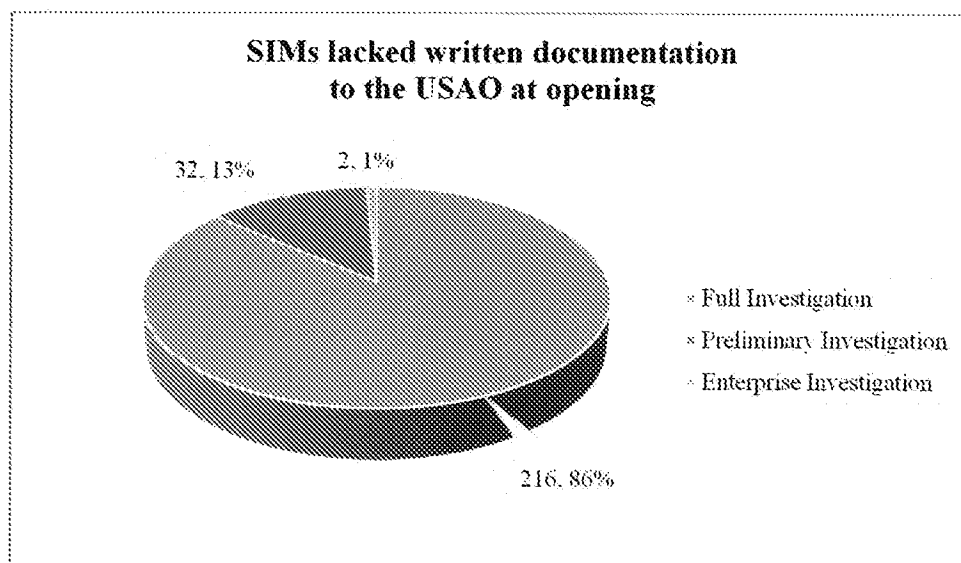
(U//~~FOUO~~) **Recommendation 3b:**

(U//~~FOUO~~) **Observation 4:** Field Offices failed to document in writing to the investigative file the notification to the USAO of the opening of a SIM, in violation of the DIOG, 0667DPG, dated 09/28/2016 and 07/23/2018.

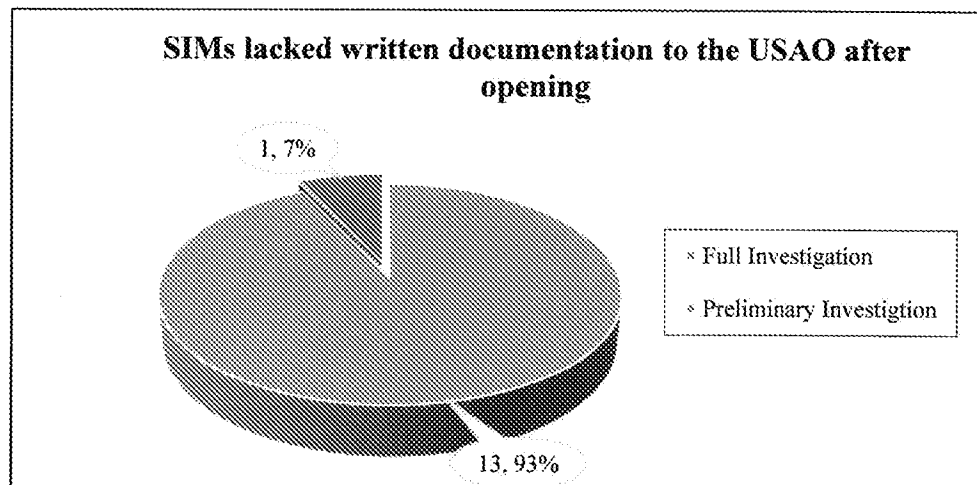
(U//~~FOUO~~) **Analysis 4:** The DIOG, Sections 6.7.1.1.C.1, 7.7.1.1.C.1, and 8.6.4.1 stated: *"The field office must also notify the United States Attorney's Office (USAO), in writing (by letterhead memorandum LHM or similar documentation), as soon as practicable, but no later than 30 calendar days after the investigation was opened. If the field office does not intend to provide notice to the USAO, the field office must state the circumstances for not notifying the USAO in its written notice and LHM (or similar documentation) to the responsible FBIHQ operational unit. Upon receiving this notice from the field office, the FBIHQ operational unit must notify DOJ in writing (by LHM or similar documentation), as soon as practicable [redacted] [redacted] after the investigation was opened."*

b7E -4

(U//~~FOUO~~) INSD assessed 250 (71%) of the 353 audited SIMs lacked written documentation to the USAO by LHM or similar documentation within 30 calendars days after the investigation was opened.



(U//~~FOUO~~) INSD assessed 14 cases where the SIM was identified after the opening lacked written documentation to the USAO by LHM or similar documentation.



(U//~~FOUO~~) INSD noted in 39 SIM investigations there were instances where the opening EC stated the AUSA had been advised, briefed, or concurred with the opening or indicated the matter was referred by the USAO. Other SIM investigations it was noted subsequent utilization of investigative methods which required USAO assistance and notations of meetings with AUSAs indicating the USAO was aware of the investigation. INSD assessed a review of the DIOG Sections related to written notification to the USAO for PI, FI, and EI should be reviewed to determine if written notification in a LHM or similar documentation to the USAO is required or if the notification to the USAO of the investigation could be documented in the opening EC or subsequent document [REDACTED]

b7E -4

(U//~~FOUO~~) INSD determined 526 (70%) of the 747 compliance errors were related to approvals, notifications, and administrative matters. INSD assessed field offices opened and closed SIMs without always including the appropriately designated officials and addressing the other requirements, in accordance with the DIOG, Sections 6, 7, and 8. INSD assessed to mitigate these compliance errors, IPO coordinating with OIC, OGC, ITTAD, and the appropriate FBIHQ operational Divisions should consider drafting a SIM template suitable for inclusion as a Sentinel form which lists the appropriate approving officials for SIMs. The template could provide guidance on other administrative requirements and notifications necessary to comply with the DIOG concerning SIMs in the opening and closing. INSD assessed inclusion of such a template would help to reduce the number of instances of non-compliance.

(U//~~FOUO~~) **Recommendation 4a:** [REDACTED]

b5 -1

(U//~~FOUO~~) **Recommendation 4b:** [REDACTED]

(U//~~FOUO~~) **Recommendation 4c:**

b5 -1

(U//~~FOUO~~) **Recommendation 4d:**

(U//~~FOUO~~) **Observation 5:** A review of the SIM investigations determined a lack of timely investigative activity.

(U//~~FOUO~~) **Analysis 5:** The DIOG, Section 3.5.4.1 stated: *"The file review process is designed to ensure that investigative and intelligence activities are progressing adequately and are being conducted in compliance with applicable statutes, regulations, and FBI/DOJ policies and procedures. As a management tool, the file review process has proven effective for operational program oversight; for tracking the progress of investigative and intelligence collection; and for helping to ensure investigative focus, program management, and reduction of risk. File reviews help supervisors ensure that their offices are effectively supervising activities in their respective territories and are monitoring investigative activities carried out on their behalf in other field offices. For example, a supervisor may use a file review to ensure that an employee assigned to an investigation has addressed all logical investigation in a timely manner or that the employee has successfully set necessary leads."*

(U//~~FOUO~~) During the review INSD assessed the SIM investigations for the timeliness of investigative activity. Based on the importance and emphasis from FBIHQ on SIM investigations, a review was conducted to determine if there were periods of 90 days or longer with no investigative activity or serial in the main or sub-files with no explanation in the file for lack of activity. A total of 74 (21%) of the 353 SIM investigations had a lack of investigative activity for periods of 90 days or longer. Of the SIMs 67 (91%) were FIs, 6 (8%) were PIs, and 1 (1%) was an EI:

Field Office	File Number	Case Type
Albany		FI
Albany		FI
Albuquerque		FI
Albuquerque		FI
Albuquerque		FI
Anchorage		FI
Anchorage	58D-AN-3007505	FI

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b7E -1

Field Office	File Number	Case Type
Atlanta		FI
Atlanta	194A-AT-2867113	FI
Atlanta		FI
Atlanta	194B-AT-2864913	FI
Atlanta		PI
Baltimore		FI
Baltimore		FI
Baltimore		FI
Baltimore		FI
Birmingham	194C-BH-2570384	FI
Birmingham	194D-BH-2867073	FI
Birmingham		FI
Birmingham	194B-BH-2378478	PI
Boston	56E-BS-3007303	FI
Charlotte		FI
Charlotte		FI
Chicago		FI
Chicago		FI
Chicago	194B-CG-3059452	FI
Chicago		FI
Cincinnati		FI
Columbia	194A-CO-3109226	FI
Columbia		EI
Dallas		FI
Dallas		FI
Denver		FI
Detroit		FI
Counterintelligence		FI
Houston		FI
Houston		FI
Houston		PI
Indianapolis		FI
Los Angeles	194A-LA-2933858	FI
Los Angeles		FI
Los Angeles	196C-LA-3063761	FI
Los Angeles		PI
Miami		FI
Miami	194B-MM-2658329	FI

b3 -1
b7A -1
b7E -1

Field Office	File Number	Case Type
Miami	194B-MM-3103639	FI
Milwaukee		FI
Minneapolis	196D-MP-2655581	FI
Minneapolis	266N-MP-2982668	FI
New Haven		FI
New Orleans	318A-NO-2589194	FI
New York City		FI
Philadelphia		FI
Philadelphia	194C-PH-2379391	FI
Pittsburgh		FI
Sacramento		FI
Sacramento		FI
Sacramento		FI
Salt Lake City		FI
Salt Lake City		PI
San Antonio		FI
San Antonio	194B-SA-2827351	FI
San Antonio	194C-SA-2828323	FI
San Antonio		FI
San Antonio		FI
San Diego	194B-SD-2599820	FI
San Juan	194-SJ-3001187	PI
Seattle		FI
St. Louis		FI
St. Louis	194B-SL-3054749	FI
St. Louis	194C-SL-2954951	FI
St. Louis		FI
Washington		FI
Washington	58C-WF-2947688	FI

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(U//~~FOUO~~) **Recommendation 5:**

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(U//~~FOUO~~) **Observation 6:** Field Offices failed to obtain ADIC or SAC approval for investigative assistance to state, local, and tribal agencies, in violation of the DIOG, 0667DPG, dated 09/28/2016 and 07/23/2018.

(U//~~FOUO~~) **Analysis 6:** The DIOG, Section 12.3.2.3.1 stated: “Requests for assistance based on Section 12.3.2.3.B.1 and 12.3.2.3.B.2 above must be approved pursuant to the FBI Director’s

Delegation of Authority Memorandum, dated March 14, 2013, which delegates the approval authority. This delegated authority may not be redelegated. Requests made to Field Offices: Any ADIC or SAC (non-delegable)." Prior to the 06/11/2019 update to the DIOG did not explicitly state redelegation was not authorized. INSD assessed the investigative file based on the date of the opening and the DIOG which governed the time of the opening.

(U//~~FOUO~~) The DIOG, Sections 12.3.2.3.B.1 and 12.3.2.3.B1 stated: "*Investigations of Certain Non-Federal Violations: At the request of an appropriate state or local law enforcement official, the FBI is authorized by federal statute to assist in the investigation of the following crimes: 1) Violent acts and shootings occurring in a place of public use. "Place of public use" is defined broadly as "those parts of any building, land, street, waterway, or other location that are accessible or open to members of the public, whether continuously, periodically, or occasionally," and expressly encompasses "any commercial, business, cultural, historical, educational, religious, governmental, entertainment, recreational, or similar place that is so accessible or open to the public." See Investigative Assistance for Violent Crimes Act of 2012, Pub. Law 112-265 (to be codified at 28 U.S.C. 530C(b)(1)(M)(i)) and A.G. Order 3365-2013. Investigative Assistance provided under this authority must utilize file classification 356E. 2) Mass killings: defined as three or more killings in a single incident and attempted mass killings. See Investigative Assistance for Violent Crimes Act of 2012, Pub. Law 112-265 (to be codified at 28 U.S.C. 530C(b)(1)(M)(i)) and A.G. Order 3365-2013. Investigative Assistance provided under this authority must utilize file classification 356A, 356B, 356C, or 356D, depending on the location of the incident."*

(U//~~FOUO~~) INSD assessed 59 (14%) of the 420 assistance investigations opened did not obtain ADIC, SAC, or ASAC approval:

Field Office	File Number
Albany	
Anchorage	
Baltimore	
Baltimore	
Boston	356E-BS-6531053
Buffalo	356E-BF-6468940
Charlotte	
Charlotte	
Dallas	
Dallas	
Denver	
Denver	356A-DN-3878111
Denver	
Denver	
Detroit	
Honolulu	
Houston	

b7A -1

b7E -1

Field Office	File Number
Las Vegas	
Las Vegas	
Las Vegas	
Las Vegas	
Los Angeles	
Los Angeles	
Los Angeles	
Los Angeles	
Los Angeles	
Los Angeles	
Los Angeles	
Memphis	
Memphis	
Memphis	
Miami	
Miami	
New Orleans	
Omaha	
Philadelphia	
Phoenix	
Phoenix	
Phoenix	
Portland	356A-PD-6706312
Sacramento	
Sacramento	
Salt Lake City	
San Antonio	
San Antonio	356C-SA-2241419
San Diego	
San Diego	
San Diego	356E-SD-6238737
San Francisco	
Seattle	
Seattle	
Seattle	
Springfield	
Springfield	
Springfield	
Springfield	356A-SI-2596403
St. Louis	

b7A -1

b7E -1

Field Office	File Number
St. Louis	356E-SL-2966360
St. Louis	356E-SL-2979443

(U//~~FOUO~~) **Recommendation 6a:**

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(U//~~FOUO~~) **Recommendation 6b:**

(U//~~FOUO~~) **Observation 7:** Field Offices failed to utilize the FD-999 when providing
 in violation of the DIOG, 0667DPG, dated 09/28/2016 and 07/23/2018.

(U//~~FOUO~~) **Analysis 7:** The DIOG, Section 12.5.1 stated:

b7E -4

(U//~~FOUO~~) The DIOG, Section 12.5.2 stated:
(U//~~FOUO~~) INSD assessed 64 (29%) of the 222 cases where
b7A -1
b7E -1,4

Field Office	File Number
Anchorage	
Baltimore	
Baltimore	
Boston	
Buffalo	356E-BF-6468940
Buffalo	356E-BF-3089383
Charlotte	
Charlotte	
Charlotte	356E-CE-6770942
Chicago	

Field Office	File Number
Cleveland	
Cleveland	
Cleveland	
Cleveland	
Cleveland	
Cleveland	356E-CV-2179398
Cleveland	184A-CV-2125359
Cleveland	
Cleveland	
Cleveland	
CID	
Dallas	
Denver	
Denver	
Denver	
Denver	
Denver	
Denver	
Detroit	184A-DE-2105302
Detroit	
Houston	
Houston	
Indianapolis	
Jackson	
Las Vegas	
Los Angeles	
Los Angeles	
Los Angeles	
Los Angeles	
Memphis	
Newark	
Newark	
Newark	
Newark	
Newark	
New Orleans	
New Orleans	
New Orleans	
New York	356E-NY-3061409
New York	
New York	
New York	

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b7E -1

Field Office	File Number
Omaha	306-OM-52002
Omaha	
Pittsburgh	
Portland	
Sacramento	356A-PD-6706312
Salt Lake City	184A-SU-6350001
San Antonio	
Seattle	
Seattle	184A-SE-3096318
Seattle	
St. Louis	
WFO	
WFO	
WFO	
WFO	

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(U//~~FOUO~~) INSD assessed three (1%) of the 222 cases where [REDACTED]

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Field Office	File Number
Albuquerque	
Sacramento	
San Diego	356E-SD-2231967

(U//~~FOUO~~) The review conducted by INSD reinforced previous IPO and OIC assessment that Section 12 of the DIOG was confusing and difficult to ensure compliance based on the wording of the section. In addition, IPO and OIC opined if it was necessary to require an FD-999 in [REDACTED]

IPO and OIC will continue to review the DIOG, Section 12 to determine what revisions are appropriate to ensure compliance.

(U//~~FOUO~~) **Recommendation 7a:** [REDACTED]

b5 -1

[REDACTED]

(U//~~FOUO~~) **Recommendation 7b:** [REDACTED]

[REDACTED]

(U//~~FOUO~~) **Recommendation 7c:** [REDACTED]

[REDACTED]

(U//~~FOUO~~) **Observation 8:** Field Offices improperly opened Assistance to state, local, and tribal agencies, in violation of the DIOG, 0667DPG, dated 09/28/2016 and 07/23/2018.

(U//~~FOUO~~) **Analysis 8:** The DIOG, Section 12.3.2.3.B stated: *"At the request of an appropriate state or local law enforcement official, the FBI is authorized by federal statute to assist in the investigation of the following crimes: 1) Violent acts and shootings occurring in a place of public use... 2) Mass killings... 3) Serial killings... 4) Felony killings of state and local law enforcement officers. 5) Felony crimes of violence against travelers... Prior to conducting any investigative activity under the authority of one of the above listed federal statutes, a predicated investigation must be opened."*

(U//~~FOUO~~) INSD assessed 198 (47%) of the 420 audited matters opened as assistance to state, local, and tribal agencies did not have a request for assistance documented in the file.

(U//~~FOUO~~) **Recommendation 8:**

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(U//~~FOUO~~) **Observation 9:** Field Offices conducted investigative activity in Administrative and Control files, in violation of the DIOG, 0667DPG, dated 09/28/2016 and 07/23/2018.

(U//~~FOUO~~) **Analysis 9:** The DIOG, Appendix J.1.4.3 stated: *"Administrative files may be used only for administrative purposes; they cannot be used for investigative purposes. Administrative files may be used for documenting noninvestigative matters, such as training matters (1 classification), administrative matters (319 classification), personnel files (67 classification), etc. Note: Investigative activity must not be conducted out of an administrative file."*

(U//~~FOUO~~) INSD assessed 10 (4%) of the 252 Administrative files reviewed contained investigative activity which was solely documented to the Administrative file:

Field Office	File Number	Serial Number
Atlanta		
Chicago		
Chicago		
FBIHQ - Laboratory		
Newark		
Salt Lake City		
Salt Lake City		
Seattle		
Washington		
Washington		

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(U//~~FOUO~~) A review of the FBIHQ Laboratory file [REDACTED] has determined the activity in the file is technical or expert assistance to another law enforcement or intelligence agency which is allowable, however is allowable in a Control file not an Administrative file. The Laboratory Division should change the Administrative file to a Control file or open a separate Control file and document the assistance appropriately.

(U//~~FOUO~~) The DIOG, Appendix J.1.4.4 stated: *"Control files may be used only for documenting program management functions and communications, technical or expert assistance to another law enforcement or intelligence agency, or other managerial functions. Program management functions may include liaison contacts, training exercises, training received/provided, written intelligence products that are prepared for program management purposes, etc. Note: Investigative activity must not be conducted out of a control file."*

(U//~~FOUO~~) INSD assessed 32 (8%) of the 395 Control files reviewed contained investigative activity which was solely documented to the Control file:

Field Office	File Number	Serial Number
Albuquerque		
Boston		
Boston		
Dallas		
Detroit		
FBIHQ - Counter Intelligence		
FBIHQ - Counterterrorism		
FBIHQ - Cyber		
FBIHQ - Office of International Operations		
Indianapolis		
LEGAT Accra		
LEGAT Copenhagen		
LEGAT Mexico City		
Little Rock		
Los Angeles		
Miami		
Mobile		
New Haven		
New York		
New York		
New York		
New York		

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Field Office	File Number	Serial Number
Philadelphia		
Philadelphia		
Philadelphia		
Richmond		
Sacramento		
San Antonio		
San Diego		
San Juan		
Springfield		

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(U//~~FOUO~~) The serials identified are not all inclusive of the investigative activity and the entire file should be reviewed to ensure compliance.

(U//~~FOUO~~) **Recommendation 9a:**

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(U//~~FOUO~~) **Instruction 9b:**

(U//~~FOUO~~) **Instruction 9c:**

(U//~~FOUO~~) **Instruction 9d:**

(U//~~FOUO~~) **Instruction 9e:**

(U//~~FOUO~~) **Instruction 9f:**

[Redacted]

(U//~~FOUO~~) **Instruction 9g:**

[Redacted]

[Redacted]

(U//~~FOUO~~) **Instruction 9h:**

[Redacted]

[Redacted]

(U//~~FOUO~~) **Instruction 9i:**

[Redacted]

[Redacted]

(U//~~FOUO~~) **Instruction 9j:**

[Redacted]

[Redacted]

(U//~~FOUO~~) **Instruction 9k:**

[Redacted]

[Redacted]

(U//~~FOUO~~) **Instruction 9l**

[Redacted]

[Redacted]

(U//~~FOUO~~) **Instruction 9m:**

[Redacted]

[Redacted]

(U//~~FOUO~~) **Instruction 9n:**

[Redacted]

[Redacted]

(U//~~FOUO~~) **Instruction 9o:**

[Redacted]

[Redacted]

[REDACTED]

(U//~~FOUO~~) Instruction 9p:

[REDACTED]

[REDACTED]

(U//~~FOUO~~) Instruction 9a:

[REDACTED]

[REDACTED]

(U//~~FOUO~~) Instruction 9r:

[REDACTED]

[REDACTED]

(U//~~FOUO~~) Instruction 9s:

[REDACTED]

[REDACTED]

(U//~~FOUO~~) Instruction 9t:

[REDACTED]

[REDACTED]

(U//~~FOUO~~) Instruction 9u:

[REDACTED]

[REDACTED]

(U//~~FOUO~~) Instruction 9v:

[REDACTED]

[REDACTED]

(U//~~FOUO~~) Instruction 9w:

[REDACTED]

[REDACTED]

(U//~~FOUO~~) Instruction 9x:

[REDACTED]

[REDACTED]

(U//~~FOUO~~) **Instruction 9y:**

(U//~~FOUO~~) **Instruction 9z:**

(U//~~FOUO~~) **Instruction 9aa:**

(U//~~FOUO~~) **Instruction 9bb:**

(U//~~FOUO~~) **Instruction 9cc:**

(U//~~FOUO~~) **Instruction 9dd:**

(U//~~FOUO~~) **Instruction 9ee:**

(U//~~FOUO~~) **Instruction 9ff:**

(U//~~FOUO~~) **Instruction 9gg:**

[REDACTED]

(U//~~FOUO~~) **Observation 10:** The Administrative and Control files did not have the appropriate letter before the case number, in violation of the DIOG, 0667DPG, dated 09/28/2016 and 07/23/2018.

(U//~~FOUO~~) The DIOG, Appendix J.1.4.3 stated: *"Administrative files are designated with the letter "A" before the case number, e.g., 319X-HQ-A12345. When referring to an administrative file in communications, the file number must include the letter "A" before the case number to indicate the file is an administrative file. The DIOG, Appendix J 1.4.4 stated: "Control files are designated with the letter "C" before the case number, e.g., 29B-NF-C4456. When referring to the file number of a control file in communications, the file number must include the letter "C" before the case number to indicate the file is a control file."*

(U//~~FOUO~~) INSD reviewed 647 Administrative and Control files and determined 57 (9%) lacked the letter "A" or "C" designation in the file number. Sentinel does not permit users to change or add the letter designator after the case file had been opened. Therefore, if the case was converted after opening, opened improperly, or the letter designation did not migrate into Sentinel the case manager was unable to add the letter designator in order to be in compliance with the DIOG. [REDACTED]

[REDACTED]

(U//~~FOUO~~) **Recommendation 10:** [REDACTED]

[REDACTED]

(U//~~FOUO~~) **Observation 11:** Field Offices are not conducting periodic reviews of Administrative and Control files, in violation of the DIOG, 0667DPG, dated 09/28/2016 and 07/23/2018.

(U//~~FOUO~~) The DIOG, Section 3.5.2.9 stated: *"Supervisors must periodically review investigative, control, and administrative files assigned to their areas of program responsibility or management in accordance with DIOG subsection 3.5.4 below."* The DIOG, Section 3.5.4.1 stated: *"The file review process is designed to ensure that investigative and intelligence activities are progressing adequately and are being conducted in compliance with applicable statutes, regulations, and FBI/DOJ policies and procedures. Additionally, the periodic review of control files and relevant administrative files permits supervisors to evaluate progress in meeting program-related objectives and helps to ensure that FBI resources are aligned with strategic objectives and are being utilized and managed properly and in accordance with policy standards."*

(U//~~FOUO~~) INSD reviewed 252 Administrative files and determined 111 (44%) had no serials in the file since 10/01/2018. In addition, 237 (94%) had no file reviews conducted during the review period of 01/01/2018 - 06/30/2019. INSD reviewed 395 Control files and determined 161 (41%) had no serials in the file since 10/01/2018. In addition, 365 (92%) had no file reviews conducted during the review period of 01/01/2018 - 06/30/2019. [REDACTED]

(U//~~FOUO~~) **Recommendation 11:** [REDACTED]

b5 -1

V. LIST OF APPENDIXES

Appendix A: Inspection Staffing Roster

Appendix B: Abbreviations

Appendix C: Audit Questions

Appendix A: Inspection Staffing Roster

Section Chief, External Audit and Compliance Section

Suzanne Turner (INSD)

Compliance and Mitigation Unit (CAMU)

	(INSD)
	(INSD)
	(INSD)
	(INSD)
	(INSD)
	(INSD)
	(INSD)

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b7C -1

Office of Integrity and Compliance and Internal Policy Office

	(DO) OIC
	(DO) OIC
	(TP) IPO

Assistant Inspectors in Place

	(SD)
	PX
	(CTD)
	(CYD)
	(CID)
	(CTD)
	(DN)
	(DI)
	(NO)
	(CID)
	(SE)

Appendix B: Abbreviations

The following abbreviations are utilized in the body of inspection reports:

A/	Acting
AD	Assistant Director
ADC	Associate Division Counsel
ADD	Associate Deputy Director
ADIC	Assistant Director in Charge
AFOSI	Air Force Office of Special Investigations
AG	Attorney General
AGG	Attorney General Guidelines
AIIP	Assistant Inspector-in-Place
AIS	Analytical Integrity Standards
ALAT	Assistant Legal Attaché
AOB	Average on Board
AOR	Area of Responsibility
ASAC	Assistant Special Agent in Charge
ASC	Assistant Section Chief
ATF	Bureau of Alcohol, Tobacco, Firearms, and Explosives
AUSA	Assistant United States Attorney
CAM	Collection Awareness Message
CAP	Collection Action Plan
CBP	US Customs and Border Protection Agency
CD	Counterintelligence Division
CDC	Chief Division Counsel
CDefC	Cleared Defense Contractors
CFC	Complex Financial Crime
CFCP	Complex Financial Crime Program
CHS	Confidential Human Source
CHSC	Confidential Human Source Coordinator
CHSPG	Confidential Human Source Police Implementation Guide
CI	Counterintelligence
CIA	Central Intelligence Agency
CID	Criminal Investigative Division
CIO	Chief Information Officer
CIP	Computer Intrusion Program
CIRG	Critical Incident Response Group
CJIS	Criminal Justice Information Services Division
CMC	Crisis Management Coordinator
COB	Close of Business
CollMC	Collection Management Coordinator
CPD	Corporate Policy Directive
CPN	Corporate Policy Notice
CPO	Corporate Policy Office
CRO	Chief Reports Officer

CR	Civil Rights
CRP	Civil Rights Program
CS	Computer Scientist
CSCC	Central Strategic Coordinator Component
CSG	Consolidated Strategy Guide
CSO	Chief Security Officer
CT	Counterterrorism
CTD	Counterterrorism Division
CTP	Counterterrorism Preparedness
CyP	Cyber Program
CyD	Cyber Division
CTT	Cyber Threat Team
DAD	Deputy Assistant Director
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DCO	Division Compliance Officer
DD	Deputy Director
DEA	Drug Enforcement Administration
DHS	Department of Homeland Security
DI	Directorate of Intelligence
DIA	Defense Intelligence Agency
DIN	Domain Intelligence Note
DIOG	Domestic Investigations and Operations Guide
DLAT	Deputy Legal Attaché
DMC	Domain Management Coordinator
DO	Director's Office
DOD	Department of Defense
DOE	Department of Energy
DOJ	Department of Justice
DOR	Depth of Review
DPD	Division Policy Directive
DT	Domestic Terrorism
DTA	Division Threat Analysis
DTO	Drug Trafficking Organization
DTP	Domestic Terrorism Program
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EAD	Executive Assistant Director
EC	Electronic Communication
ECPA	Electronic Communications Privacy Act
ECT	Evidence Control Technician
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ELSUR	Electronic Surveillance
EM	Executive Management
E-mail	Electronic Mail
EOD	Enter On Duty
ERT	Evidence Response Team
FACE	Freedom of Access to Clinic Entrances

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FAM	Federal Air Marshal
FATG	Fraud Against the Government
FBI	Federal Bureau of Investigation
FBIHQ	FBI Headquarters
FCI	Foreign Counterintelligence
FD	Finance Division
FI	Full Investigation
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FIF	Financial Institution Fraud
FIG	Field Intelligence Group
FISA	Foreign Intelligence Surveillance Act
FISAMS	Foreign Intelligence Surveillance Act Management System
FISC	Foreign Intelligence Surveillance Court
FLSD	Facilities and Logistics Services Division
FM	Financial Manager
FO	Field Office
FOASR	Field Office Annual Source Reporting
FOI	Field Office Inspection
FOIA	Freedom of Information Act
FOSP	Field Office Strategic Plan
FPO	Federal Prosecuting Official
FSL	Funded Staffing Level
FTR	Federal Travel Regulations
FY	Fiscal Year
GAGAS	Generally Accepted Government Auditing Standards
G/CEP	Gang/Criminal Enterprise Program
GPC	Government Purchase Card
HCF	Health Care Fraud
HIDTA	High Intensity Drug Trafficking Area
HRD	Human Resources Division
HQC	Headquarters City
HSI	Homeland Security Investigation
HUMINT	Human Intelligence
IA	Intelligence Analyst
IB	Intelligence Bulletin
IDQ	Intelligence Directed Query
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IG	Inspector General
I/Is	Indictments/Informations
IIC	Inspector-in-Charge
IINI	Innocent Images National Initiative
IIR	Intelligence Information Report
IM	Intelligence Memo
IN	Intelligence Note
INSD	Inspection Division
IOB	Intelligence Oversight Board

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IOD	International Operations Division
IP	Intelligence Program
IPC	Intelligence Program Coordinator
IPM	Intelligence Program Manager
IPO	Internal Purchase Order
IPR	Intellectual Property Rights
IRAM	Inspection Risk Assessment Matrix
IS	Intelligence Study
ISPs	Internet Service Providers
IT	International Terrorism
ITP	International Terrorism Program
ITSD	Information Technology Services Division
JTTF	Joint Terrorism Task Force
LD	Laboratory Division
LEGAT	Legal Attaché
LLD	Less Lethal Device
LOA	LEGAT Operations Assistant
LSRT	Laboratory Shooting Reconstruction Team
MAOP	Manual of Administrative Operations and Procedures
MAPA	Management and Program Analyst
MIOG	Manual of Investigative Operations and Guidelines
MOU	Memorandum of Understanding
NA	FBI National Academy
NAACP	National Association for the Advancement of Colored People
NASA	National Aeronautics and Space Administration
NCIS	Naval Criminal Investigative Service
NJTTF	National Joint Terrorism Task Force
NPR	National Program Review
NSA	National Security Agency
NSB	National Security Branch
NSL	National Security Letter
NSLB	National Security Law Branch
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NTPs	National Threat Priorities
OC	Organized Crime
OCP	Organized Crime Program
OCA	Office of Congressional Affairs
OCDETF	Organized Crime Drug Enforcement Task Force
OCKO	Office of the Chief Knowledge Officer
OEEOA	Office of Equal Employment Opportunity Affairs
OGA	Other Government Agency
OGC	Office of the General Counsel
OIA	Otherwise Illegal Activity
OIC	Office of Integrity and Compliance
OIG	Office of the Inspector General

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OLEC	Office of Law Enforcement Coordination
OPA	Office of Public Affairs
OPR	FBI - Office of Professional Responsibility
Op Order	Operations Order
OST	Operational Support Technician
OTD	Operational Technology Division
PAL	Prioritized Action List
PAR	Performance Appraisal
PC	Public Corruption
PCHS	Potential Confidential Human Source
PCIR	Public Corruption Information Report
PCOR	Program Coordinator
PCP	Public Corruption Program
PFI	Principal Firearms Instructor
PI	Preliminary Investigation
PIOB	Potential Intelligence Oversight Board
PM	Program Manager

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QSSR	Quarterly Supervisory Source Report
RA	Resident Agency
RCFL	Regional Computer Forensics Laboratory
RFI	Request For Information
RIP	Recruitment in Place
RMA	Resource Management and Allocation
RMD	Records Management Division
RPO	Resource Planning Office
RO	Reports Officer
SA	Special Agent
SABT	Special Agent Bomb Technician
SAC	Special Agent in Charge
SAS	Supervisory Administrative Specialist
SC	Section Chief
SCI	Sensitive Compartmented Information
SCIF	Sensitive Compartmented Information Facility
SDR	Source Directed Requirement
SecD	Security Division
SES	Senior Executive Service
SETA	Special Event Threat Assessment
SFOS	Supervisory Financial Operations Specialist
SIA	Supervisory Intelligence Analyst
SIOC	Strategic Information and Operations Center

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SIR	Situational Information Report
SIRG	Shooting Incident Review Group
SIRT	Shooting Incident Review Team
SITREP	Situational Report

SME	Subject Matter Expert
SMS	Strategy Management System
SOG	Special Operations Group
SOP	Standard Operating Procedure
SOS	Staff Operations Specialist
SPC	Strategic Partnership Coordinator
SPS	Strategy Performance Session
SSA	Supervisory Special Agent
SSG	Special Surveillance Group
SSIA	Senior Supervisory Intelligence Analyst
SSRA	Supervisory Senior Resident Agent
SSTF	Safe Streets Task Force
STTF	Safe Trails Task Force
SWAT	Special Weapons and Tactics
TD	Training Division
TDY	Temporary Duty
TF	Task Force
TFA	Task Force Agent
TFO	Task Force Officer
TMS	Threat Mitigation Strategy
TMT	Threat Mitigation Team
TOC-E	Transnational Organized Crime - Eastern
TOC-W	Transnational Organized Crime - Western
TPD	Third Party Draft
TRIP	Travel Request Initiation & Payment
TRP	Threat Review and Prioritization
TS	Top Secret
TSC	Terrorist Screening Center
TSL	Target Staffing Level
TTP	Tactical Targeting Package
TURK	Time Utilization Record Keeping
UC	Unit Chief
UCE	Undercover Employee
UCO	Undercover Operation
UDP	Undisclosed Participation
UIA	Unauthorized Illegal Activity
U.S.	United States
USA	United States Attorney
USAO	United States Attorney's Office
USG	United States Government
USIC	United States Intelligence Community
USMS	United States Marshals Service
USPER	US Person
USSS	United States Secret Service
VC	Violent Crime
VCAC	Violent Crimes Against Children

VCP	Violent Crimes Program
VCTF	Violent Crimes Task Force
VCT	Violent Criminal Threat
VCTP	Violent Criminal Threat Program
WCC	White Collar Crime
WCCP	White Collar Crime Program
WG	Working Group
WMD	Weapons of Mass Destruction
WMDD	Weapons of Mass Destruction Directorate
WMDP	Weapons of Mass Destruction Program