

Department of Homeland Security **Office of Inspector General**

Adequacy of USSS' Internal Investigation of Alleged Misconduct in Cartagena, Colombia





OFFICE OF INSPECTOR GENERAL
Department of Homeland Security

Washington, DC 20528 / www.oig.dhs.gov

January 24, 2013

MEMORANDUM FOR: The Honorable Mark Sullivan
Director
United States Secret Service

FROM: Charles K. Edwards
Deputy Inspector General

SUBJECT: *Adequacy of USSS' Internal Investigation of Alleged Misconduct in Cartagena, Colombia*

Attached for your action is our final report, *Adequacy of USSS' Internal Investigation of Alleged Misconduct in Cartagena, Colombia*. We incorporated the formal comments from the United States Secret Service in the final report. The report contains no recommendations.

Consistent with our responsibility under the *Inspector General Act*, we are providing copies of our report to appropriate congressional committees with oversight and appropriation responsibility over the Department of Homeland Security. We will post the report on our website for public dissemination.

Please call me with any questions, or your staff may contact Carlton I. Mann, Assistant Inspector General for Inspections, at (202) 254-4100, or William J. McCarron, Chief Inspector, at (202) 254-4206.

Attachment



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

Table of Contents

Executive Summary.....	1
Background	2
Results of Review	3
USSS Management in Cartagena Responded Appropriately to Allegations That Employees Solicited Prostitutes	4
USSS Inspection Division Conducted an Administrative Investigation	6
USSS Revised Policies and Changed Supervision Staffing on Protective Visits.....	13

Appendixes

Appendix A: Objectives, Scope, and Methodology	16
Appendix B: Management Comments to the Draft Report.....	17
Appendix C: Timeline of Events	18
Appendix D: Major Contributors to This Report	19
Appendix E: Report Distribution.....	20

Abbreviations

CNP	Colombian National Police
DHS	Department of Homeland Security
DOD	Department of Defense
FSD	Forensic Services Division
GS	General Schedule
ISP	Inspection Division (USSS)
NCCA	National Center for Credibility Assessment
OIG	Office of Inspector General
RAIC	Resident Agent in Charge
RES	Office of Professional Responsibility
SAIC	Special Agent in Charge
USSS	United States Secret Service



Executive Summary

In April 2012, United States Secret Service (USSS) employees were in Cartagena, Colombia, preparing for a Presidential visit to the Summit of the Americas. During these preparations, several USSS employees were suspected of soliciting prostitutes. In response, USSS took the following steps: (1) managers in Cartagena responded to the alleged solicitation; (2) USSS' internal affairs office investigated the alleged solicitation; and (3) USSS revised policies and supervision staffing for protective visits. We assessed USSS' response to the alleged solicitation of prostitutes by its employees.

We determined that USSS responded expeditiously and thoroughly to the allegations. Managers in Cartagena began a management inquiry to determine whether USSS employees solicited prostitutes and to ensure that the protective mission was not compromised. The USSS Director relieved 11 employees who allegedly solicited prostitutes from their protective assignments in Cartagena. USSS replaced 5 of the 11 employees and reorganized staff to maintain the integrity of the protective mission.

USSS placed the 11 employees suspected of soliciting prostitutes on administrative leave and suspended their security clearances. USSS' internal affairs organization, the Office of Professional Responsibility, Inspection Division, conducted an investigation. Investigative activities included interviewing 232 subjects and witnesses, sending four inspectors to Colombia, reviewing thousands of email messages, and administering 14 polygraph examinations.

On August 29, 2012, USSS issued a report on its investigative activities through May 24, 2012. The report presented a thorough account of employee conduct, and concluded that Presidential security, sensitive information, and equipment were not compromised in Cartagena. On December 27, 2012, the agency issued a second report on the results of its interviews and investigative work conducted after May 24, 2012. We received the second report while we were preparing our final report, and determined that it did not alter our findings or conclusions.

USSS subsequently established and issued a directive that reiterated agency expectations and policies, and introduced additional guidance regarding briefings, supervision, and off-duty activities on foreign trips. The USSS Director also created a Professional Reinforcement Working Group to assess USSS' organizational behavior, performance, and accountability.

We make no recommendations in this report.



OFFICE OF INSPECTOR GENERAL

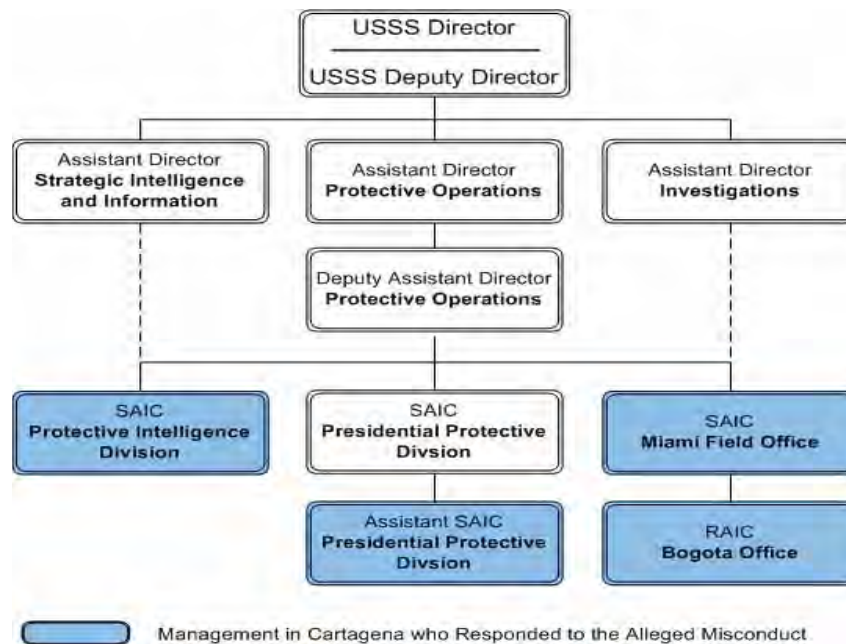
Department of Homeland Security

Background

USSS has two primary missions: (1) to safeguard the Nation's financial infrastructure and payment systems and (2) to protect national leaders, visiting heads of state and government, designated sites, and high-profile events. USSS employs approximately 3,200 special agents, 1,300 uniformed officers, and more than 2,000 technical, professional, and administrative support personnel.

In April 2012, USSS staff were preparing for a Presidential visit to Cartagena, Colombia, for the Summit of the Americas. The Special Agent in Charge (SAIC) of the Miami Field Office is responsible for USSS activities in Colombia. Other managers such as the SAIC of the Protective Intelligence Division and the Assistant SAIC of the Presidential Protective Division were also present (figure 1). In addition, the Resident Agent in Charge (RAIC) of the Bogota, Colombia office was in Cartagena in support of preparations for the Presidential visit.

Figure 1. USSS Chain of Command During the Presidential Visit to Cartagena, Colombia, in April 2012



Source: USSS.

On April 12, 2012, the Colombian National Police (CNP) received a complaint from a prostitute alleging that a patron at the Hotel Caribe, who was a USSS employee, did not pay for sexual services she provided. After CNP and USSS personnel were unsuccessful at contacting the employee, a discussion concerning payment ensued among CNP officers, the prostitute, and USSS personnel outside the room of the alleged solicitor.



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

The prostitute's complaint was resolved when two other USSS employees paid the complainant. The head of security for Hotel Caribe notified U.S. Embassy personnel about the incident. The State Department's Deputy Regional Security Officer notified USSS managers of the incident and that other USSS employees might have solicited prostitutes.

Although prostitution is not specifically addressed in USSS' standards of conduct, USSS officials asserted that solicitation of prostitutes violated standards, which state that "employees shall not engage in criminal, infamous, dishonest, immoral or notoriously disgraceful conduct or other conduct prejudicial to the [United States] Government." Further, the agency's standards of conduct state that the absence of a specific, published policy covering an act that brings discredit to an employee or USSS does not mean the act is condoned, is permissible, or would not call for and result in corrective or disciplinary action. USSS employees are expected to adhere to these standards both on and off duty.

In addition, adjudicative guidelines for revoking access to classified information state, in part, that sexual behavior is a factor when the behavior may subject the individual to coercion, exploitation, or duress, or reflects lack of judgment or discretion. All USSS employees must maintain eligibility to access classified information at the Top Secret level to remain employed.

Results of Review

USSS managers must use their discretion to address employee conduct concerns while meeting security needs on protective assignments. Managers in Cartagena responded appropriately by notifying headquarters promptly about the incident, gathering facts, and taking steps to ensure that the protective mission was not compromised. The USSS Director relieved employees who allegedly solicited prostitutes from their protective assignments in Cartagena.

Subsequent to the employees' removal from the protective assignment in Cartagena, USSS' internal affairs organization, the Office of Professional Responsibility (RES), Inspection Division (ISP), investigated the alleged solicitation. The investigation was consistent with USSS procedures, was conducted quickly, and provided a credible account of employee conduct.

USSS also established and issued a directive that reiterated agency expectations and policies, and introduced additional guidance regarding briefings, supervision, and off-duty activities on foreign trips. In addition, the USSS Director created a Professional Reinforcement Working Group to assess USSS' organizational behavior, performance, and accountability.



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

USSS Management in Cartagena Responded Appropriately to Allegations That Employees Solicited Prostitutes

The allegations that USSS employees in Cartagena, Colombia, solicited prostitutes prompted a resource-intensive response in Cartagena and at headquarters. The Miami SAIC began a management inquiry to determine whether USSS employees solicited prostitutes and to ensure that the protective mission was not compromised. We determined that the Miami SAIC's inquiry was thorough, given the impending arrival of the President and the need to focus on the protective aspects of the visit.

USSS Management in Cartagena Performed a Management Inquiry

After the Department of State's Deputy Regional Security Officer informed USSS management in Cartagena of the alleged misconduct, the Miami SAIC instructed managers to notify their respective chains of command in the Office of Protective Operations and the Office of Strategic Intelligence and Information. The Miami SAIC informed the chain of command in the Office of Investigations of the intent to conduct a management inquiry.

After alerting USSS headquarters, the Miami SAIC began collecting facts surrounding the alleged misconduct and identifying individuals who may have had prostitutes as guests at the Hotel Caribe. The Miami SAIC did not attempt to determine whether USSS employees solicited prostitutes prior to April 11, or at other hotels in Cartagena.

Within an hour of the Miami SAIC learning of the allegations, the Assistant Directors of the Office of Investigations and the Office of Protective Operations briefed the USSS Director on the incident. The USSS Director contacted the Miami SAIC to discuss the incident and potential courses of action.

The Department of State's Deputy Regional Security Officer provided USSS managers a handwritten note that included names of USSS employees who Hotel Caribe personnel believed may have been involved in the alleged solicitation of prostitutes. The Miami SAIC instructed USSS logistics officials to verify that the names and room numbers matched, and that the individuals were USSS employees. However, USSS managers questioned the accuracy of the note because one of the individuals listed had been working an all-night shift on April 11, and could not have been involved. Hotel Caribe charges registered guests a fee for hosting female visitors in their rooms between 11:00 p.m. and 6:00 a.m. These visitors must register with the front desk and provide identification. To determine who might have been involved, the Miami SAIC



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

requested a list of all Government employees who checked an overnight guest into their rooms on April 11. This list included the names of 12 USSS employees for whom the hotel provided overnight guest registration cards.

Within 11 hours of learning of the incident at the Hotel Caribe, USSS managers had interviewed 12 USSS employees whose room numbers were associated with having overnight guests. During these interviews, 11 employees admitted to hosting female foreign nationals in their rooms, and 1 employee denied the allegation. After reviewing the overnight guest registration and observing that the room number had been changed by hand, the Miami SAIC determined that this employee did not have a female foreign national in his room. After further inquiry with Department of Defense (DOD) officials, the Miami SAIC determined that a DOD employee hosting a female guest overnight wrote the USSS employee's room number on the card without the USSS employee's knowledge or consent. The USSS employee resumed his duties in support of the Presidential visit. On April 13, 2012, the Miami SAIC sent a message to the Assistant Directors of the Office of Investigations and RES that summarized the interviews.

We determined that the Miami SAIC's inquiry was thorough and timely, given the impending arrival of the President and the need to ensure appropriate attention to the protective aspects of the visit.

USSS Management Took Steps To Ensure That the Protective Mission Was Not Compromised

According to USSS policies, misconduct allegations can result in removing employees from their protective assignments, putting them on administrative leave, and suspending their clearance. While the inquiry in Cartagena was ongoing, the USSS Director ordered the removal of the 11 individuals who allegedly solicited prostitutes from their protective assignments and their return to the United States. They departed Cartagena on the morning of April 13, less than 24 hours after the allegations were made. Because preparations for the President's arrival were near completion at the time of the allegations, managers' efforts to remove the implicated employees from Cartagena did not affect the execution of the security plan. USSS replaced 5 of the 11 employees and reorganized staff to maintain the integrity of the protective mission.

Based on information obtained during the inquiry, the USSS managers in Cartagena concluded that employee interactions with female foreign nationals did not compromise the protective mission. During the inquiry, USSS managers concluded that employees did not disclose sensitive information. The employees



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

had not received details of the security plan and therefore did not have information that could jeopardize the protective mission.

The Miami SAIC emphasized to staff assisting with the response that the alleged misconduct was sensitive and should not be discussed with colleagues. Additionally, the Miami SAIC reminded employees supporting the Cartagena protective assignment that they were representing the U.S. Government and USSS, and must adhere to policies regarding acceptable ethics and conduct.

USSS Inspection Division Conducted an Administrative Investigation

On April 13, 2012, ISP initiated an administrative investigation to collect facts concerning possible conduct violations by employees in Cartagena and determine whether national security or the President's safety was compromised. ISP initiated an administrative investigation since the management inquiry did not identify any potential criminal activity. USSS placed the 11 employees suspected of soliciting prostitutes on administrative leave and suspended their security clearances, which is a standard USSS practice during administrative investigations.

Between April 13 and May 24, 2012, ISP took the following investigative actions:

- Requested a U.S. intelligence agency check for derogatory information on the foreign nationals involved in this incident;
- Interviewed 232 subjects and witnesses;
- Sent four inspectors to Colombia;
- Reviewed thousands of email messages; and
- Requested that the Forensic Services Division (FSD) administer 14 polygraph examinations.

On August 29, 2012, USSS issued a report on its investigative activities through May 24, 2012. The report presented a thorough account of employee conduct, and concluded that Presidential security, sensitive information, and equipment were not compromised in Cartagena. On December 27, 2012, the agency issued a second report on the results of its interviews and investigative work conducted after May 24, 2012. We received the second report while we were preparing our final report, and determined that it did not alter our findings or conclusions.



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

USSS Initiated Investigative Activities in Accordance With Departmental Policies

USSS initiated investigative activities in accordance with DHS Management Directive 0810.1 and an existing memorandum of understanding between USSS and the Office of Inspector General (OIG). The memorandum states that RES should initiate an investigation upon receipt of an allegation, and notify OIG's Office of Investigations within 5 business days. OIG's Office of Investigations will then notify ISP if it intends to assume control or become involved in the investigation, but absent such notification, ISP maintains full responsibility for these investigations.

USSS received the allegations of misconduct on April 12, 2012, and began an investigation the following day. The USSS Director informed the Acting Inspector General of the allegations by noon on April 13, 2012. On April 17, 2012, 3 business days after the incident at the Hotel Caribe, USSS notified OIG's Office of Investigations in writing of its intent to conduct an administrative investigation of the alleged misconduct in Cartagena. OIG's Office of Investigations declined to assume control of the investigation but asked to be kept informed of its outcome.

ISP's Investigative Approach Was Consistent With Internal Procedures

Solicitation of prostitutes in Cartagena is not a violation of Colombian law. RES determined that, consistent with provisions in its *Internal Operating Procedures Guide*, an administrative, rather than a criminal, investigation was the appropriate course of action. The guide specifies that in an administrative investigation, inspectors are not required to advise employees of their rights before an interview.

Scope

In the interest of conducting a focused, timely investigation, ISP limited its scope to the allegations of solicitation of prostitutes in Cartagena. ISP did not attempt to determine whether solicitation of prostitutes is widespread within USSS. However, a senior RES manager said that USSS addresses all allegations of misconduct, citing as an example a concurrent but separate inquiry into alleged solicitation of prostitutes by employees in El Salvador. We determined that the investigative scope was appropriate, given the allegations of solicitation of prostitutes by employees in Cartagena and the need to provide facts to USSS management in a timely manner.



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

Methodology

ISP's strategy was to interview implicated employees to assess the extent and nature of the allegations, and determine whether national security or the President's safety were compromised. After ISP managers provided the USSS Director with details of the alleged solicitation of prostitution by USSS employees in Cartagena, the Director authorized ISP to interview all USSS personnel who were in Colombia during the summit.

To assess whether national security was compromised, USSS asked a U.S. intelligence agency to check for derogatory information on the foreign nationals involved in this incident. Additionally, USSS asked CNP to conduct a criminal records check on the foreign nationals and to check for derogatory information on establishments visited by USSS employees. Both the USSS and DHS OIG investigative reports concluded that there was no compromise of national security. We did not evaluate those efforts.

To assess ISP's methodology, we interviewed 3 ISP managers, 17 inspectors, and 3 support personnel who were involved in the Cartagena investigation. ISP employees said that the investigation was consistent with previous internal investigations for the following reasons:

- ISP managers provided sufficient guidance;
- The pace of the investigation was fast but did not compromise the quality or integrity of ISP's work;
- Inspectors recused themselves from an interview when their relationship with the subject could cause a lack of objectivity; and
- The investigation was fair and impartial.

ISP's Investigation Was Expeditious and Thorough

ISP conducted an expeditious investigation of alleged solicitation of prostitutes by its employees in Cartagena. Within 42 days of learning of the alleged misconduct, ISP had completed interviews and polygraph examinations, reviewed records, and started drafting its initial report of investigation (see appendix C). ISP used all of its 24 inspectors, support personnel, and managers. ISP canceled a scheduled inspection of the USSS Technical Security Division to allocate additional personnel to the Cartagena investigation. Furthermore, ISP employees worked extended hours, including weekends, on the investigation.



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

ISP's investigation resulted in subject and witness statements, polygraph examination reports, email communications, and hotel records that provide a credible account of employee conduct. Subjects of the investigation included:

- Eleven employees who the Miami SAIC determined had guests in their rooms at the Hotel Caribe;
- One employee who inspectors in Cartagena determined had a guest in his room at the Hilton Hotel, Cartagena (hereafter referred to as "Hilton Hotel"); and
- One employee who notified his manager after he returned from Cartagena that he had received sexual services in exchange for money at a private apartment.

Interviews of USSS Personnel

Between April 14 and May 24, 2012, ISP inspectors interviewed all USSS personnel in Cartagena for the President's trip. Inspectors documented all interviews of USSS personnel and other witnesses through written sworn statements by interviewees, memorandums of interview, or both.

To ensure that interviews of USSS employees addressed relevant concerns, ISP designed different interview templates for personnel implicated in the incident from those employees not suspected of misconduct. We analyzed interview templates and determined that the questions adequately addressed employee conduct, as well as Presidential and national security. ISP inspectors asked USSS employees whether:

- Any misconduct took place;
- Additional employees solicited prostitutes;
- Employees disclosed sensitive information;
- Agency equipment was compromised; and
- Personnel were familiar with the standards of conduct and procedures for reporting a foreign contact.

Although ISP managers instructed inspectors to follow the templates during interviews, they also expected inspectors to ask additional questions when appropriate.

We reviewed all statements written by subjects and witnesses, as well as ISP inspectors' written accounts of the interviews, to assess whether inspectors asked relevant questions and documented interviews consistently. Even though some interviewees' written statements did not address interview questions, the



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

inspectors' written accounts of interviews typically contained additional information or explained why an interviewee was not able to answer all questions.

Investigative Activities in Colombia

From April 17 through 25, 2012, four inspectors went to Cartagena, Colombia, to interview witnesses, assess the establishments where employee misconduct originated, and obtain records relevant to the investigation. Inspectors interviewed female foreign nationals identified during the management inquiry, Hilton Hotel and Hotel Caribe staff, CNP officers, Cartagena law enforcement representatives, and U.S. Government employees with potential knowledge of the incident. USSS Bogota Resident Office personnel and CNP assisted the ISP team.

One of ISP's priorities was to interview female foreign nationals involved in the incident at the Hotel Caribe. ISP had difficulty locating them and requested assistance from CNP officials. Investigators used data from national identification cards and health record databases to locate 10 of 12 women implicated with USSS employees at the Hotel Caribe. On May 10, 2012, USSS located and interviewed another allegedly involved female foreign national in Spain. USSS could not locate one female foreign national allegedly involved. ISP used information from interviews with the Colombian women to corroborate or refute the statements of implicated USSS employees.

Interviews of Hotel Caribe employees and Colombian police assigned to the Hotel Caribe provided useful details about the actions of implicated USSS personnel. In addition, interviews with Hilton Hotel staff revealed that another USSS employee may have solicited a prostitute.

Conducting an investigation in a foreign country posed unique challenges. For example, interviewing foreign nationals required the use of translators, which, according to some inspectors, created communication barriers. Another complicating factor was that USSS does not have legal authority to conduct an investigation in Colombia. Inspectors relied on CNP officers to coordinate investigative activities. Even with their assistance, inspectors depended on female foreign nationals' consent to be interviewed, since prostitution is not illegal in Cartagena. In addition, without investigative authority, inspectors were unable to obtain records from the Hilton Hotel while in Colombia. However, with assistance from the Department of Justice, USSS subsequently obtained records of rooms billed to USSS during the summit.



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

Examination of Email Communications

Between April 13 and May 9, 2012, inspectors reviewed the USSS email accounts of subjects and witnesses. Inspectors coordinated with the USSS Office of Technical Development and Mission Support to access the email accounts and retrieve information relevant to the investigation. ISP conducted targeted searches of employee email communications and identified individual email messages that provided additional evidence.

Polygraph Examinations

ISP asked FSD to administer national security and specific-issue polygraph tests to employees implicated in misconduct. Through these tests, ISP planned to determine whether USSS employees compromised the President's security, national security, or sensitive information, and whether the employees provided truthful statements to inspectors. Between April 17 and 27, 2012, FSD administered 14 polygraph examinations to 10 employees, requiring 22 series.¹ FSD administered polygraph examinations in accordance with USSS and Federal guidelines.² ISP decided not to pursue polygraph examinations for three employees because they were in the process of separating from the agency by April 17, 2012.

We determined that the agency's use and administration of the polygraph examinations were consistent with USSS procedures. Specifically, we evaluated their compliance with the following processes:

- Initiation of a polygraph examination;
- Polygraph equipment and facilities;
- Administration of polygraph examinations;
- Polygraph program quality control; and
- Retention of polygraph examination files.

USSS polygraph guidelines state that, prior to administering polygraph examinations, inspectors should attempt to exhaust all feasible investigative leads; have a strong working knowledge of the case details; thoroughly interview the subjects; and collect sworn statements, when possible. Although ISP had not exhausted all investigative leads when FSD administered the examinations, ISP

¹ A series is the collection of the required polygraph chart(s) for a particular examination. Multiple series may be required to complete one examination.

² The USSS Polygraph Program Operating Procedures, June 2007, and the National Center for Credibility and Assessment Federal Psychophysiological Detection of Deception (Polygraph) Examiner Handbook, December 2011.



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

interviewed subjects and obtained sworn statements prior to examinations in accordance with USSS polygraph guidelines. Inspectors provided examiners with sworn statements prior to examinations.

We interviewed 2 USSS Polygraph Program managers and 14 examiners who were involved with the polygraph examinations. Seven examiners suggested that the timing of the polygraph examinations was unusual because ISP had not exhausted all investigative leads at that time, but all examiners asserted that polygraph examinations followed standard procedures and were performed with integrity and professionalism. USSS officials explained they prioritized polygraph examinations to identify potential national security threats.

We also asked the National Center for Credibility Assessment (NCCA), a DOD agency that trains polygraph examiners and provides oversight of Federal polygraph programs, to assess USSS' polygraph examinations. NCCA determined that polygraph testing protocols, procedures, and test question construction were consistent with Federal polygraph standards.

NCCA concurred with 19 of the 22 series. However, NCCA could not support USSS' conclusions in three series involving three employees. In each case, NCCA's independent scoring changed a definitive decision by USSS, whether truthful or deceptive, to "no opinion."³ Table 1 lists the scoring differences between USSS and NCCA:

Table 1. Polygraph Scoring Discrepancies Between USSS and NCCA

Examination	Series Type	USSS Decision	NCCA Decision
Employee 1	National Security	No Deception Indicated	No Opinion
Employee 2	National Security	Deception Indicated	No Opinion
Employee 3	National Security	No Deception Indicated	No Opinion

Source: NCCA.

For employees 1 and 2, NCCA's evaluation of examination data resulted in a different decision from that of USSS because of differences in scoring methodologies and interpretation of data by NCCA subject matter experts. Although the USSS scoring methodology differed from that of NCCA, NCCA determined that the USSS scoring methodology was consistent with Federal polygraph standards. NCCA said that these minor discrepancies are not indicative of problems with the examination, but rather differences of opinion during the subjective polygraph scoring process. NCCA determined that employee 3's physiology was too poor to assign a score to the data collected

³ "No opinion" is the term used when a conclusive decision on physiological data cannot be rendered.



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

during the examination, necessitating a “no opinion.”

USSS Revised Policies and Changed Supervision Staffing on Protective Visits

On April 27, 2012, in response to alleged misconduct by employees in Cartagena, Colombia, the USSS Deputy Director issued a directive reiterating existing expectations and policies and introducing additional guidance. The short amount of time this guidance has been in effect, and concurrent work by our Office of Investigations, limited our ability to fully assess its effectiveness. The USSS Director also created a Professionalism Reinforcement Working Group to assess USSS’ organizational behavior, performance, and accountability.

New Directive Further Restricts Off-Duty Activities

In response to the Cartagena incident, the USSS Deputy Director issued a directive addressing personal and professional conduct. This directive amends USSS standards of conduct with additional guidance and policies regarding off-duty conduct, briefings, and supervision on foreign trips. In addition, the directive restates that the absence of a specific, published standard of conduct covering an act or behavior does not mean that the act is condoned, is permissible, or will not result in corrective or disciplinary action. Prior to issuance of the directive, USSS employees were subject to USSS and Department of Homeland Security (DHS) conduct standards, as well as Federal guidelines for all employees of the executive branch. These policies state that employees shall not engage in infamous or disgraceful conduct and have a standard of personal behavior that reflects positively upon and will be a credit to both employees and the Government.

While in Cartagena, employees were accused of soliciting prostitutes and having them as guests in their hotel rooms, consuming excessive amounts of alcohol, and patronizing questionable local establishments while off duty. To address this alleged conduct, the directive amended standards of conduct to include the following:

- A prohibition on foreign nationals entering employees’ hotel rooms, excluding hotel staff and official counterparts;
- A mandate that, on official travel, alcohol may be consumed only in moderate amounts while off duty;
- An extension of the period before duty that employees must abstain from alcohol from 6 to 10 hours;
- A prohibition on the consumption of alcohol at the protectee hotel once the protectee arrives in the country;



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

- A prohibition on patronizing nonreputable establishments; and
- An application of the laws of the United States to USSS personnel while abroad.

The directive prohibits access to “nonreputable establishments.” Several interviewees expressed concern that the directive does not clearly define what constitutes a “nonreputable establishment.”

USSS Elevated Supervision and Intensified Briefings To Reinforce Conduct and Safety

Prior to the new directive, two employees at the General Schedule (GS)-14 pay grade supervised personnel traveling to foreign protective assignments. In Cartagena, these supervisors were alleged to have solicited prostitutes. Policy now requires that supervisors of personnel traveling to foreign protective assignments be GS-15 supervisors—one from RES and one from a field office. The directive also requires that these supervisors brief personnel on standards of conduct prior to departure to the foreign country, and enforce these standards while in the foreign country. Standards of conduct briefings will be conducted for all domestic and foreign protective assignments and high-profile events. In addition, all personnel traveling abroad must complete relevant ethics training to be eligible for protective travel.

USSS officials expressed concern that the nine GS-15 inspectors in RES are not sufficient to staff all foreign protective assignments and fulfill their internal affairs role. Another concern expressed was that a GS-15 would not be an effective deterrent against misconduct, given that the supervisor cannot feasibly enforce standards of conduct for all USSS employees associated with the visit. The GS-15 inspectors have a demanding role at a command center, working as many as 16 hours per day, which may prevent them from enforcing standards of conduct for employees with other protective assignments and duty hours. In addition, it is unclear whether the supervisor will have time to respond to misconduct while fulfilling security-related duties.

To ensure that all employees are aware of the local laws and customs upon arrival in a foreign country, the directive requires the USSS Security Clearance Division to provide country-specific briefings covering pertinent topics prior to departure to the foreign country. In addition, the directive states that the Department of State Regional Security Officer will work with USSS to provide intensified country-specific briefings upon arrival in a foreign country. The briefings will update personnel on safety issues, zones and establishments that



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

are off limits to USSS personnel, and any country-specific rules imposed by the U.S. Ambassador in the country.

Even with the help of Department of State personnel to identify reputable establishments, misconduct can occur in any location. For example, one club where employees allegedly solicited prostitutes was considered a reputable establishment. Therefore, USSS employees must still use their judgment to ensure that they do not discredit themselves or the U.S. Government.

USSS Established a Professionalism Reinforcement Working Group

In May 2012, the USSS Director established the Professionalism Reinforcement Working Group to assemble objective senior Government officials to examine the agency's organizational behavior, performance, and accountability. The group planned to review USSS' internal controls on professional conduct. It also planned to benchmark the agency against the best practices of peer organizations to identify areas where USSS is successful or in need of improvement.

The group is cochaired by the Directors of the Office of Personnel Management and the Federal Law Enforcement Training Center, and has senior representatives from the Federal Bureau of Investigation, DOD, and USSS. The USSS Director requested a report within 90 days of the group's establishment.

The group reviewed USSS' policies and standards of conduct, internal controls, patterns of discipline related to misconduct, and ethics training. In addition, through interviews and literature review, the group identified best practices at peer components and agencies such as U.S. Immigration and Customs Enforcement, Federal Bureau of Investigation, DOD's Joint Special Operations Command, and the Department of State's Diplomatic Security Service.



Appendix A

Objectives, Scope, and Methodology

The DHS OIG was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*. This is one of a series of audit, inspection, and special reports prepared as part of our oversight responsibilities to promote economy, efficiency, and effectiveness within the Department.

OIG's Office of Inspections reviewed USSS' efforts to investigate alleged solicitation of prostitutes by its employees during preparations for a Presidential visit to Cartagena, Colombia, for the 2012 Summit of the Americas. Our objectives were to determine (1) the adequacy of USSS' response to the incident in Colombia; (2) the adequacy of the scope, methodology, and conclusions of its investigation; and (3) the sufficiency of corrective actions taken or planned. On May 23, 2012, Senators Joseph Lieberman and Susan Collins asked the Acting Inspector General to conduct an independent investigation into misconduct by USSS employees in Colombia. DHS OIG conducted the investigation concurrent with our review.

To accomplish objectives 1 and 2, we interviewed USSS personnel responsible for responding to and investigating the alleged misconduct. We compared USSS internal investigation procedures with the execution of this investigation. In addition, we observed selected ISP interviews and reviewed ISP investigative files, including interview statements, polygraph examination reports, email communication, and hotel records. We compared ISP investigative files with USSS' initial report of investigation. We enlisted NCCA, a DOD agency responsible for training polygraph examiners and overseeing Federal polygraph programs, to assess the USSS polygraph examinations. To avoid interfering with the OIG's investigation, we did not interview USSS officials regarding its reports of investigation or evaluate USSS' efforts to determine whether there was a compromise of national security. However, the OIG's investigative report concluded that there was no compromise of national security.

To accomplish objective 3, we reviewed new conduct guidance. USSS issued the guidance on April 27, 2012. At the conclusion of our fieldwork, the guidance had not been in effect for a period long enough to assess its sufficiency.

We conducted fieldwork from May to September 2012. We conducted this review under the authority of the *Inspector General Act of 1978*, as amended, and according to the Quality Standards for Inspections issued by the Council of the Inspectors General on Integrity and Efficiency.



OFFICE OF INSPECTOR GENERAL
Department of Homeland Security

Appendix B

Management Comments to the Draft Report



U.S. Department of Homeland Security
UNITED STATES SECRET SERVICE

Washington, D.C. 20223

December 26, 2012

The Honorable Charles K. Edwards
Acting Inspector General
Office of the Inspector General
Department of Homeland Security
Washington, D.C. 20528

Re: Draft Report titled "Adequacy of USSS' Internal Investigation of Alleged Misconduct in Cartagena, Colombia." OIG Project Number 12-148-ISP-USSS

Dear Mr. Edwards:

Thank you for the opportunity to review and comment on this draft report. The U.S. Secret Service (USSS) appreciates the Office of the Inspector General's (OIG) positive acknowledgement regarding our investigation of this incident.

We are pleased to note that the OIG's review of our investigation found that the USSS acted expeditiously, appropriately, and professionally in its investigation of its employees and their actions in Cartagena, Colombia. Please know that I remain committed to ensuring that every USSS employee respects, recognizes, and understands their responsibilities in regard to personal and professional conduct.

Although the report does not contain recommendations, it does recognize our progress thus far in strengthening policy guidance, providing more comprehensive briefings for foreign trips, and restructuring supervision during foreign trips.

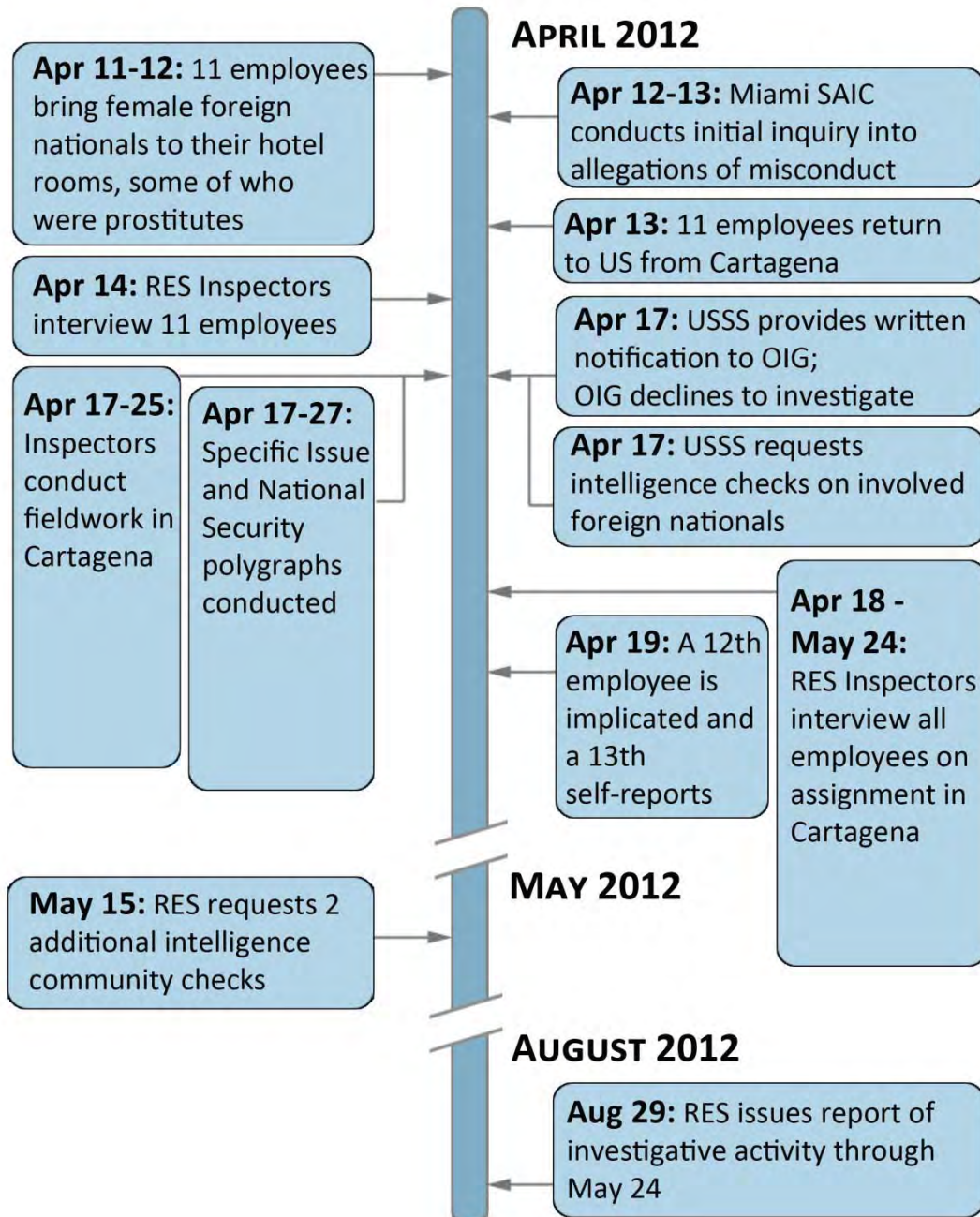
Again, thank you for the opportunity to review and comment on this draft report. Technical comments and a sensitivity request have been provided under separate cover. We look forward to continuing this work with a cooperative spirit in the future.

Sincerely,

Mark Sullivan



Appendix C Timeline of Events





Appendix D

Major Contributors to This Report

William McCarron, Chief Inspector
Paul H. Bergstrand, Lead Inspector
Karen Cottrell, Assistant Special Agent in Charge
Kimberley Lake de Pulla, Senior Inspector
Tatyana Martell, Senior Inspector
Pharyn Smith, Senior Inspector
Nicholas Ketter, Inspector



Appendix E

Report Distribution

Department of Homeland Security

Secretary
Deputy Secretary
Chief of Staff
Deputy Chief of Staff
General Counsel
Executive Secretary
Director, GAO/OIG Liaison Office
Assistant Secretary for Office of Policy
Assistant Secretary for Office of Public Affairs
Assistant Secretary for Office of Legislative Affairs
USSS Liaison
Acting Chief Privacy Officer

Office of Management and Budget

Chief, Homeland Security Branch
DHS OIG Budget Examiner

Congress

Congressional Oversight and Appropriations Committees, as appropriate

ADDITIONAL INFORMATION AND COPIES

To obtain additional copies of this document, please call us at (202) 254-4100, fax your request to (202) 254-4305, or e-mail your request to our Office of Inspector General (OIG) Office of Public Affairs at: DHS-OIG.OfficePublicAffairs@oig.dhs.gov.

For additional information, visit our website at: www.oig.dhs.gov, or follow us on Twitter at: [@dhsoig](https://twitter.com/dhsoig).

OIG HOTLINE

To expedite the reporting of alleged fraud, waste, abuse or mismanagement, or any other kinds of criminal or noncriminal misconduct relative to Department of Homeland Security (DHS) programs and operations, please visit our website at www.oig.dhs.gov and click on the red tab titled "Hotline" to report. You will be directed to complete and submit an automated DHS OIG Investigative Referral Submission Form. Submission through our website ensures that your complaint will be promptly received and reviewed by DHS OIG.

Should you be unable to access our website, you may submit your complaint in writing to: DHS Office of Inspector General, Attention: Office of Investigations Hotline, 245 Murray Drive, SW, Building 410/Mail Stop 2600, Washington, DC, 20528; or you may call 1 (800) 323-8603; or fax it directly to us at (202) 254-4297.

The OIG seeks to protect the identity of each writer and caller.