FINAL REPORT

Administrative Inquiry of Florida Keys National Marine Sanctuary

OIG COMPLAINT REFERRAL NO.

AUGUST 4, 2016

PREPARED BY:

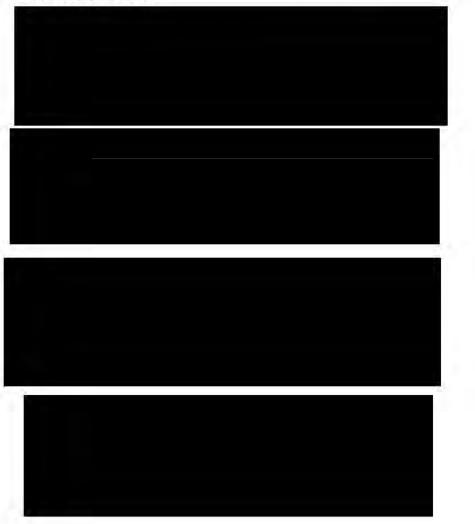


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Signatures of Concurrence

We, the undersigned members of the Administrative Inquiry Team, agree fully with the information, findings, and recommendations included in this Final Report and corresponding Appendices and attest that, to the best of our knowledge, all information contained herein is factual and accurate.



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Executive Summary

Initial Complaint

This inquiry began as a management inquiry in late April 2016, based on a letter to from from from from from from a separate anonymous claim that was submitted as a formal Office of Inspector General (OIG) complaint, that echoed many of the same themes and allegations in the letter.

National Ocean Service (NOS) leadership charged an independent Administrative Inquiry Team (AIT), comprised of ______, with the authority to conduct an inquiry into the complaint regarding the FKNMS. The anonymous complainant alleged that

The complainant

also stated that

Methodology

In late May 2016, sent an email to all FKNMS staff stating that, "The National Ocean Service (NOS) is conducting an inquiry into an Office of Inspector General (OIG) complaint alleging

and encouraged anyone with knowledge of the alleged issues to set up an interview with the AIT. The AIT ultimately interviewed

and others who possessed information relevant to this inquiry. Draft written statements were provided to all interviewees for review, with the opportunity to edit for accuracy and to provide additional information via addendum. Final signed statements were provided by **additional information**, and all are included as an appendix to this report.

Rigorous quality assurance and quality control measures were instituted to ensure the fairness, consistency, and accuracy of the inquiry process and this resulting report. These measures are detailed in the Methodology section.

Findings

Table 1 summarizes the allegations, findings, and recommended NOS/ONMS actions stemming from this inquiry. In the course of this inquiry, the AIT also

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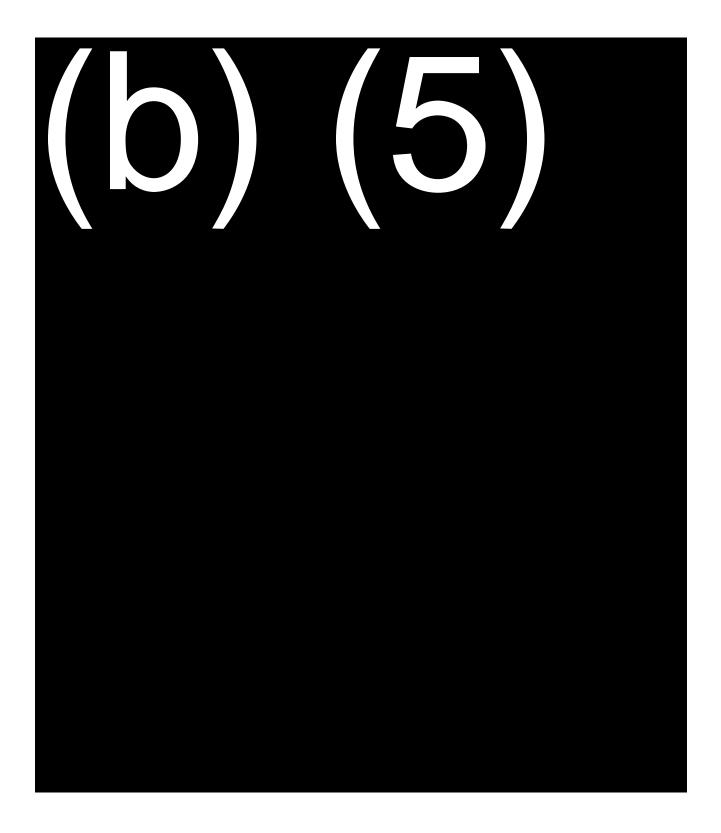
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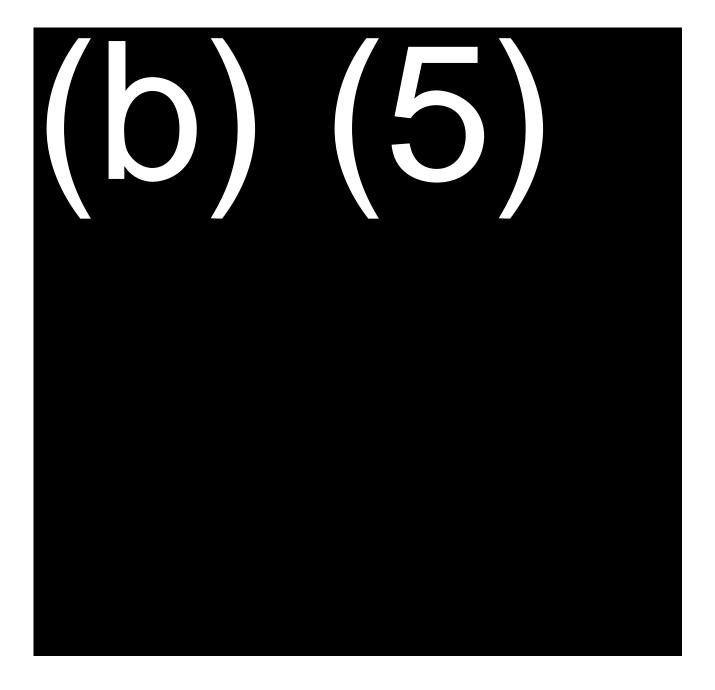
issues and the associated findings are included in the table below, and denoted as the OIG complaint.



Table 1 - Summary of Allegations Findings and Recommended Actions¹





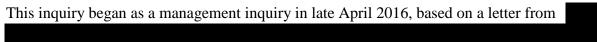


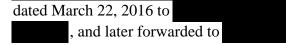
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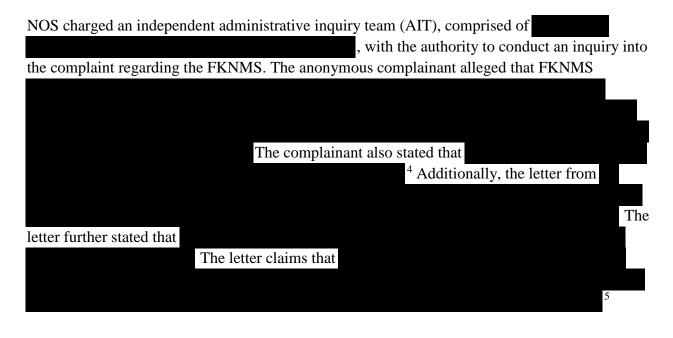
Each of these categories of recommendations are discussed with much greater specificity in the Recommendations section.

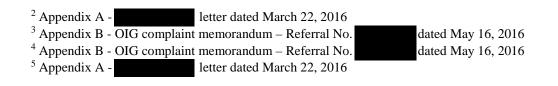
Background





On May 18, 2016, NOAA was made aware of a separate anonymous claim that was submitted as a formal Office of Inspector General (OIG) complaint.³ As a result, on May 23, 2016, NOS's management inquiry became an administrative inquiry.





Methodology

Interviews

On May 25, 2016, **Section** sent an email to all FKNMS staff⁶ stating that "The National Ocean Service (NOS) is conducting an inquiry into an Office of Inspector General (OIG) complaint alleging **Section** and encouraged anyone with knowledge of the alleged issues to set up an interview with the AIT.⁷ The AIT scheduled interviews with all individuals requesting to talk with the team, and also proactively requested interviews with **Section** whom the AIT believed had substantive knowledge of the alleged issues, based on background information the AIT collected and/or information gathered from other interviews.



were interviewed in total, with some individuals interviewed twice⁸ to follow up on information gleaned during subsequent **subsequent** interviews. In all interviews except five⁹ there were three members of the team present, fulfilling interviewer and note taker roles. In those five interviews, two members of the team were present.¹⁰

- ⁸ Statements
- ⁹ Statements

⁶ Appendix C -⁷ Appendix D -

email to FKNMS staff dated May 25, 2016

¹⁰ Appendix \overline{E} - AIT Interview Schedule

Statements

During each interview, a note taker recorded a summary of the conversation between the interviewer(s) and interviewee. Following each interview, a draft statement was developed from the note taker's summary. Before each draft statement was sent to the interviewee to review, it was reviewed in detail by at least one (and often both) interviewers for accuracy and completeness.

Each interviewee was sent their draft statement and given the opportunity to review and edit. Interviewees were also given the opportunity to submit an addendum to the statement if they recalled anything after the interview or wanted to submit additional supporting documentation. If interviewees agreed with the accuracy of the statement, they signed and returned it. If interviewees found any errors or inaccuracies in their draft statement, they used the Track Changes feature in Microsoft Word to submit edits. The note taker and interviewer reviewed all edits in detail. All changes that were grammatical in nature or did not otherwise substantially alter the content of the original draft statement, were accepted and incorporated into the final version of the statement. If the interviewee's edits did substantively alter content of the interviewees edited version in order to accurately represent those differences. These statements include a cover page highlighting that the statement contains substantive content changes. Interviewees that submitted edits such as these have been made aware that both versions are included in this final report.¹¹

Of the **statements** included in this report, one remains unsigned (Statement). This statement includes a cover page highlighting it as unsigned, but still has been included in the Findings section for the sake of completeness, although its inclusion or exclusion would have no effect on the overall findings and recommendations.

Interim Findings

After completing and reviewing all interview statements, the AIT met to discuss the primary preliminary findings. The team collectively developed an interim findings and recommendations memorandum and presented that information to NOS and ONMS leadership.¹³ Based upon these

¹¹ Statements (

¹² Appendix F - AIT

¹³ Appendix G - FKNMS OIG interim findings and recommendations memorandum

interim findings, NOS and ONMS determined that

Findings

After reviewing all statements and corresponding documents, the AIT met to discuss the primary findings resulting from this inquiry. Once these findings were noted, a single team member drafted the Findings section. All team members reviewed, edited, and agreed on the findings.

14

Some aspects of the findings were determined to be quantifiable. A spreadsheet was developed that tallied the frequency that themes, terms, concerns, and drivers that were mentioned among interviewees.¹⁵ Given the subjective nature of the spreadsheet, three AIT members conducted independent analyses of the statements and did not share their results until after all members had completed their analyses to avoid influencing one another. Once the AIT members completed their assessments, their three separate spreadsheets were reconciled and consolidated into one. There was complete concurrence on the vast majority of cells in the initial consolidated spreadsheet, but for those that weren't in agreement, the team reviewed the discrepancies in detail in conjunction with the written statements and determined a single value for each of those cells, representing a consensus view of the entire analysis team.

A similar quality control process was implemented by the AIT for all other analyses, computations, and references in this document. All information in this report was reviewed independently by at least two (and frequently three or four) AIT members, and any identified discrepancies were reconciled by the relevant reviewers until consensus was reached.

Findings were also supported by direct quotations from the statements. For statements that have two versions included in this report (due to substantive edits by the interviewee) quotes were taken verbatim from the final statements edited by the interviewee.

Recommendations

After reviewing the statements and corresponding documents, the AIT met to discuss the primary recommendations resulting from the inquiry. Once the recommendations were noted, a single team

¹⁴ Appendix H - Email from informing staff of ¹⁴ Appendix H - Email from a informing staff of
 ¹⁵ Appendix I - Statement Attributes Summary Spreadsheet

member drafted the Recommendations section. All team members reviewed, edited, and agreed on the recommendations.

Consultation with Attorneys

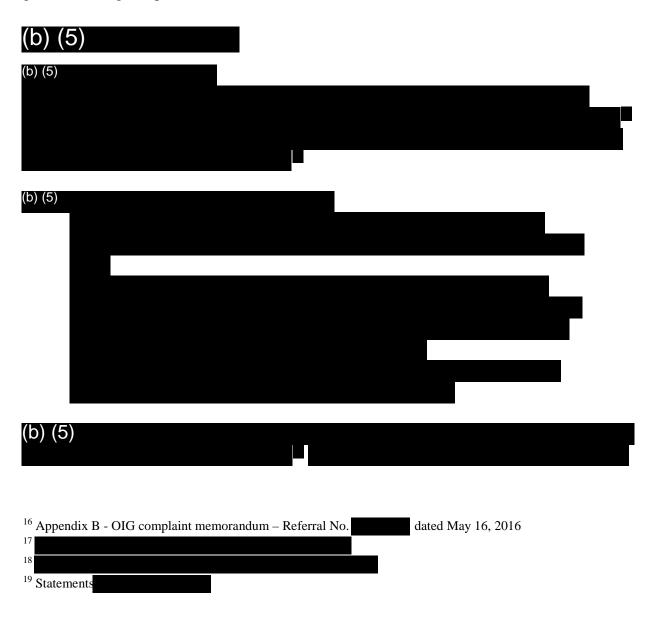


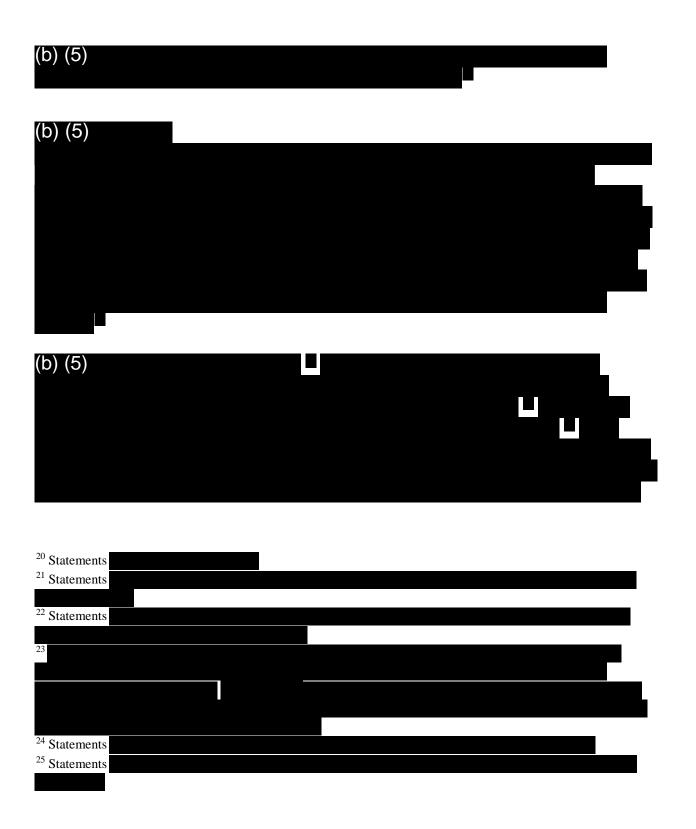
Findings

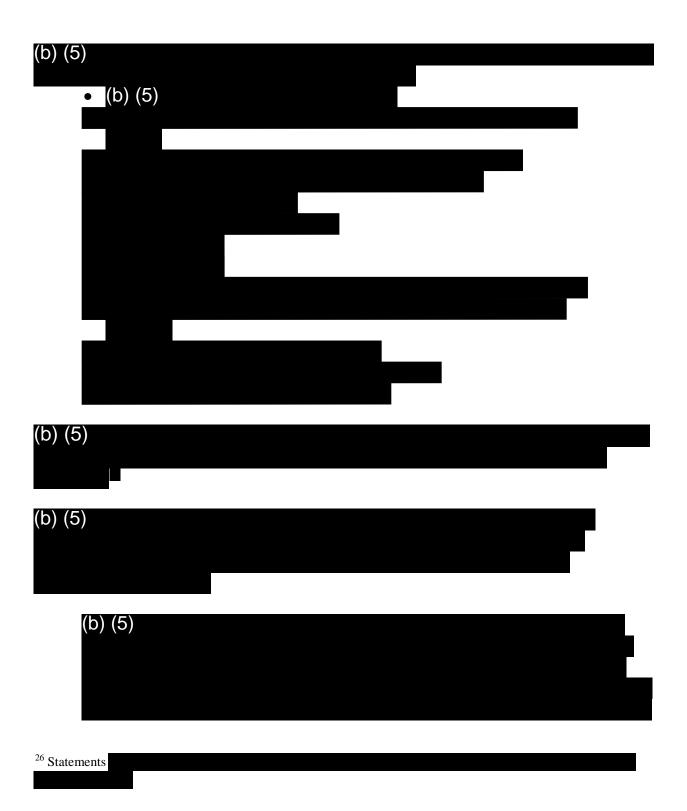
Below are the findings of the AIT pertaining to the allegations made in OIG Complaint Referral No. ,¹⁶ as well as These findings are based directly on the

and other relevant individuals, conducted by AIT

and the corresponding written interviewee statements, as well as additional data and information gathered during this process.









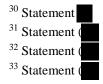
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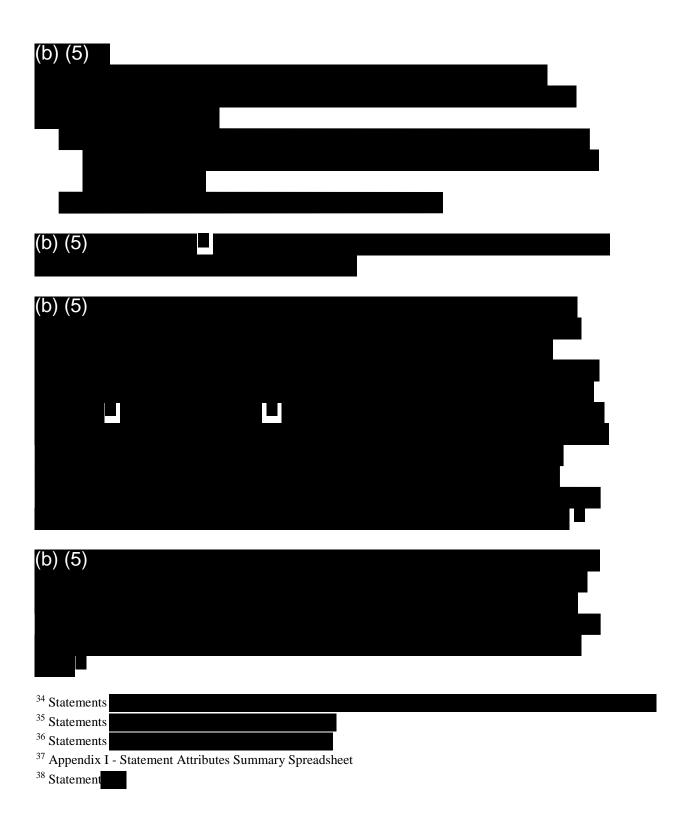
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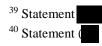


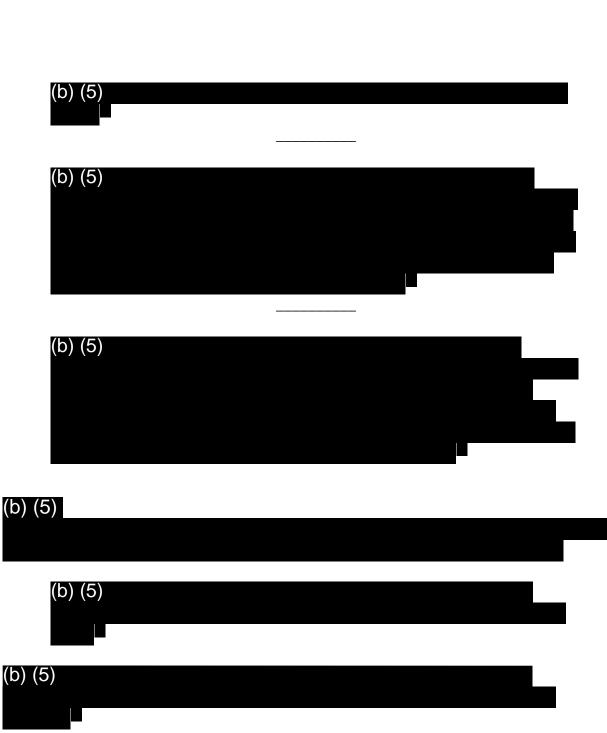


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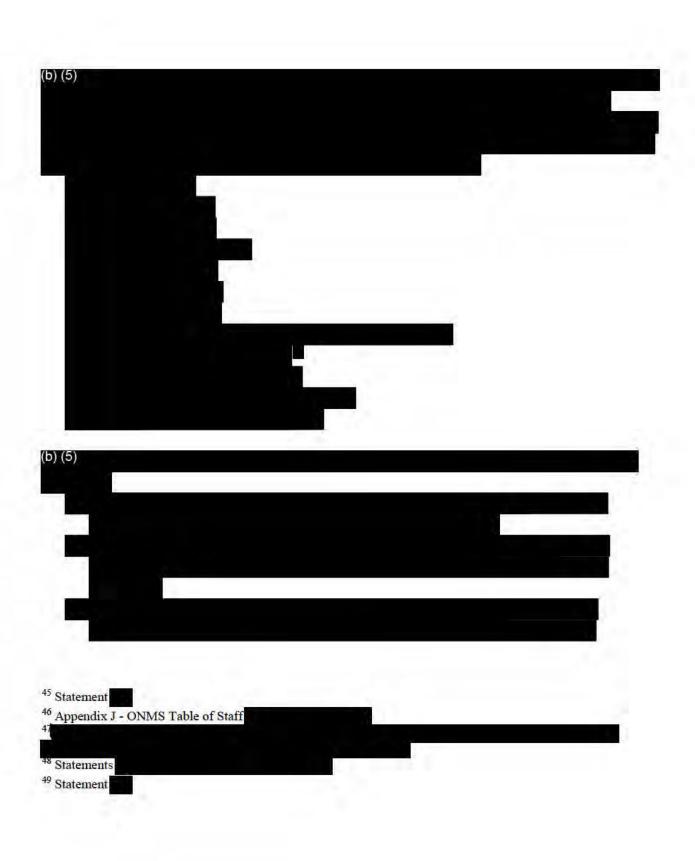
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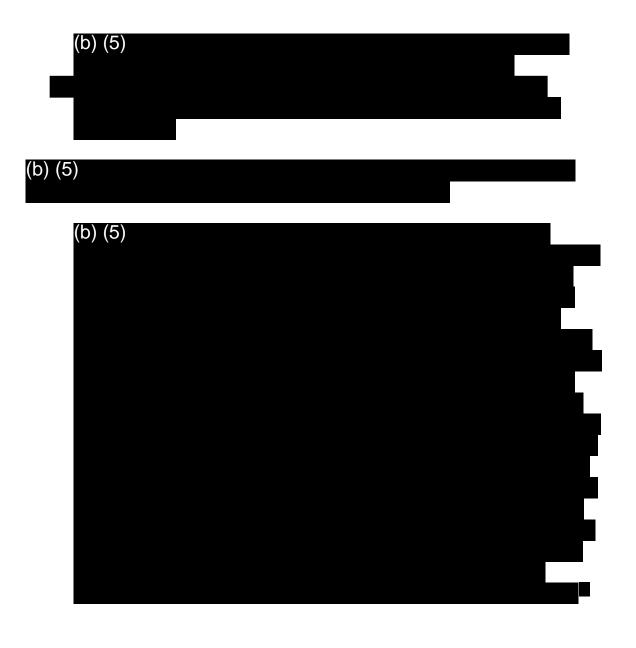
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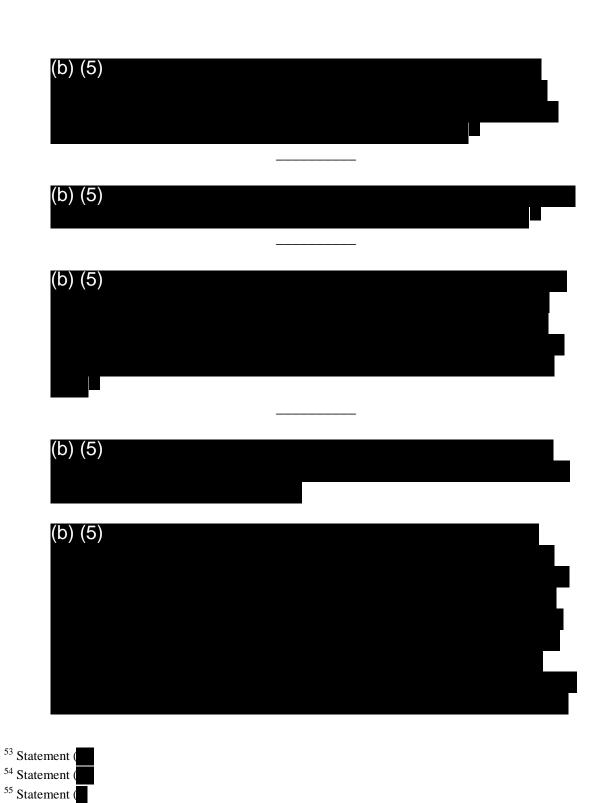


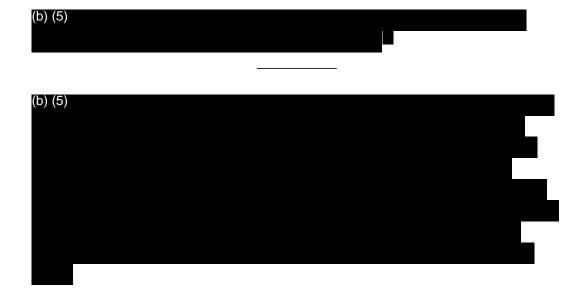
⁴¹ Statement
 ⁴² Statement
 ⁴³ Statement
 ⁴⁴ Statement















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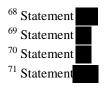


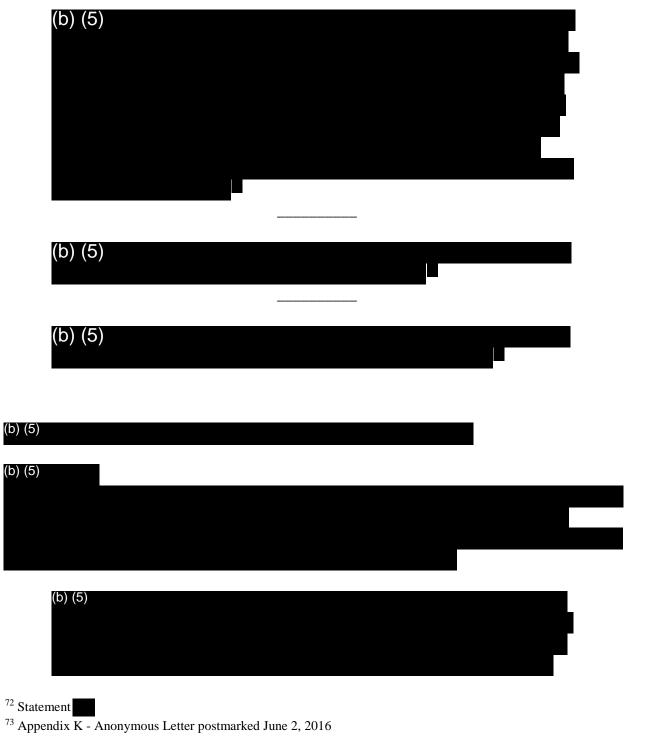




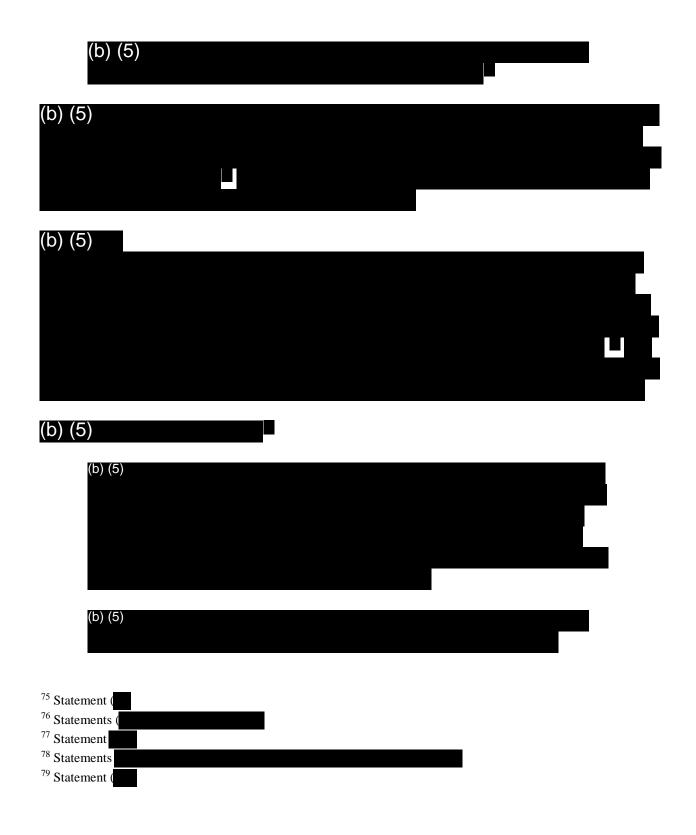








⁷⁴ Statement



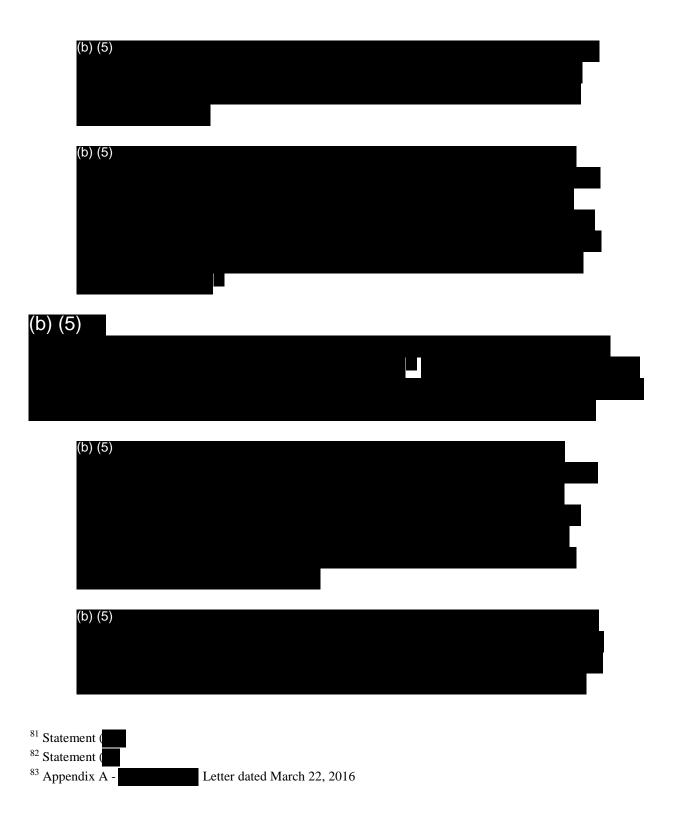




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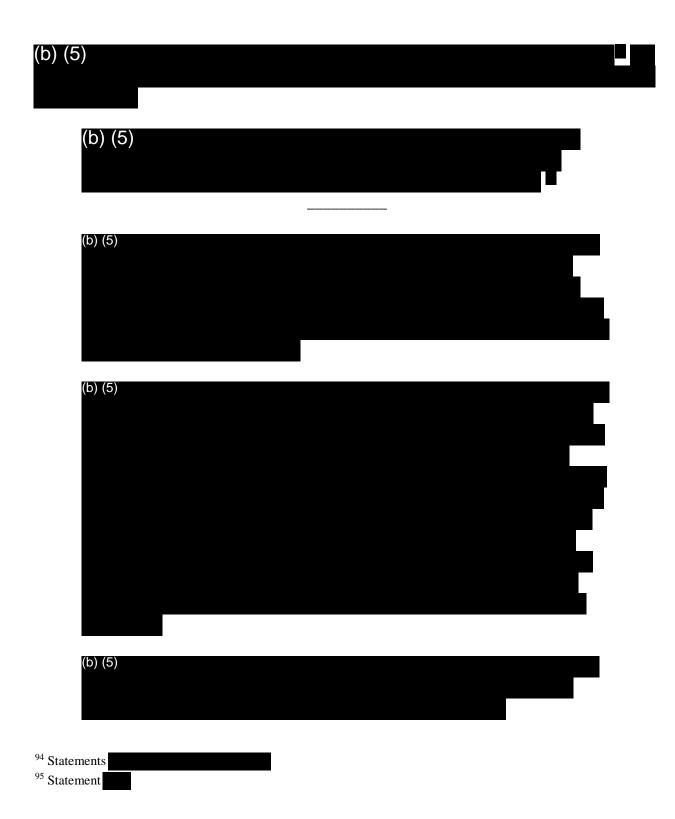


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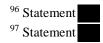


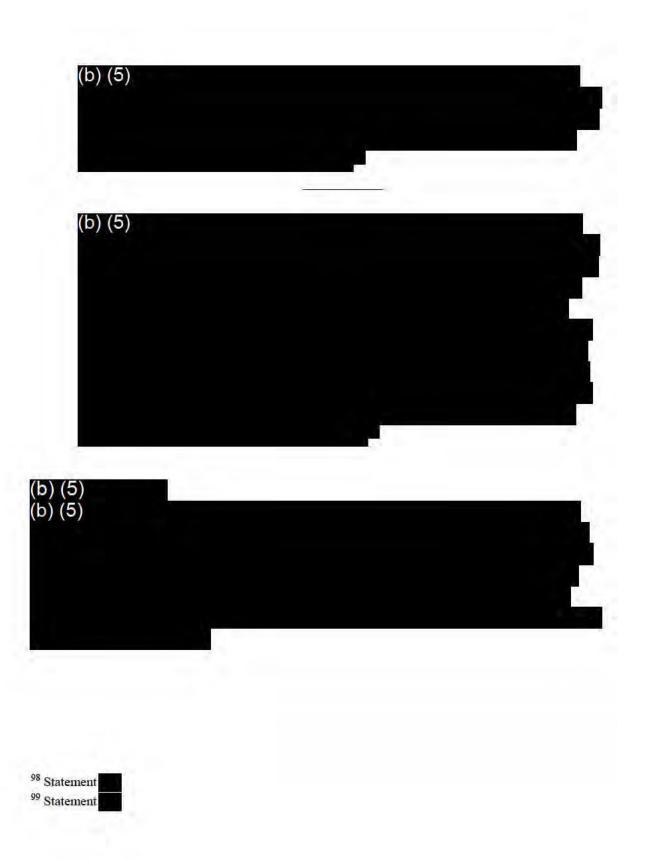


















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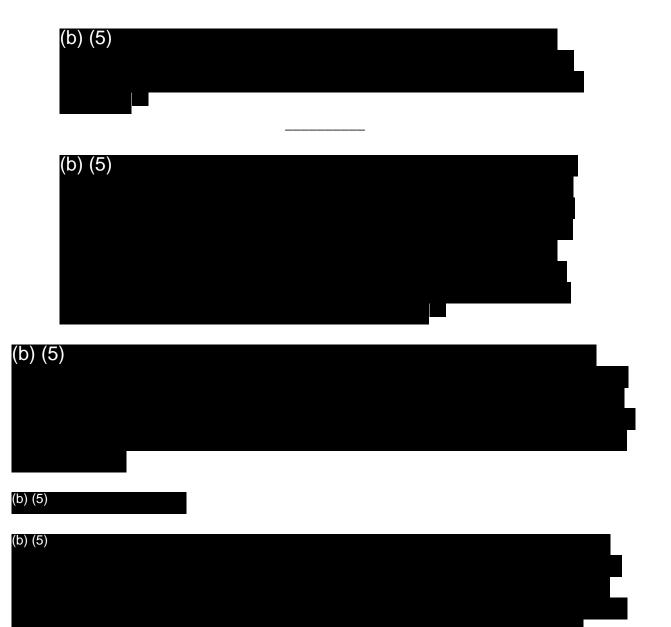
¹⁰⁰ Statements





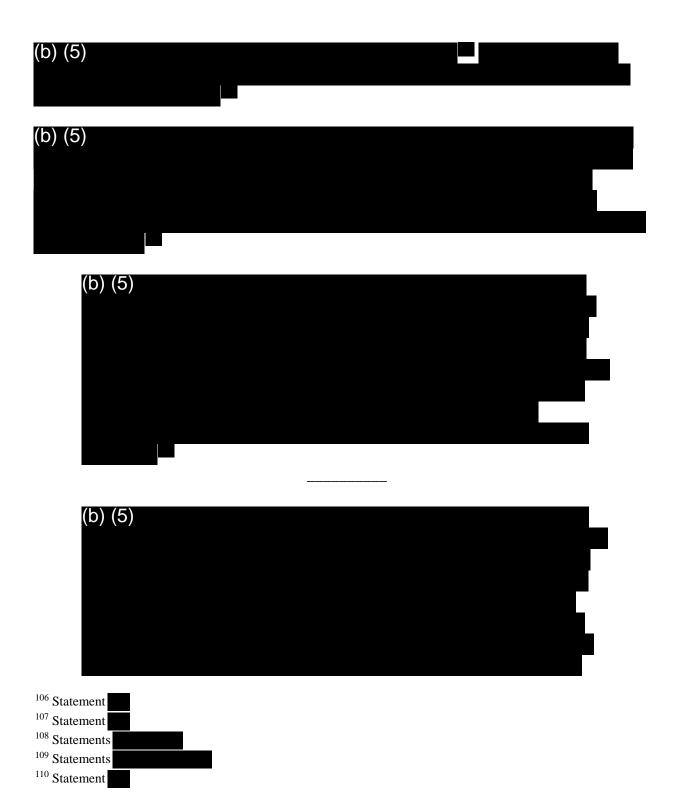


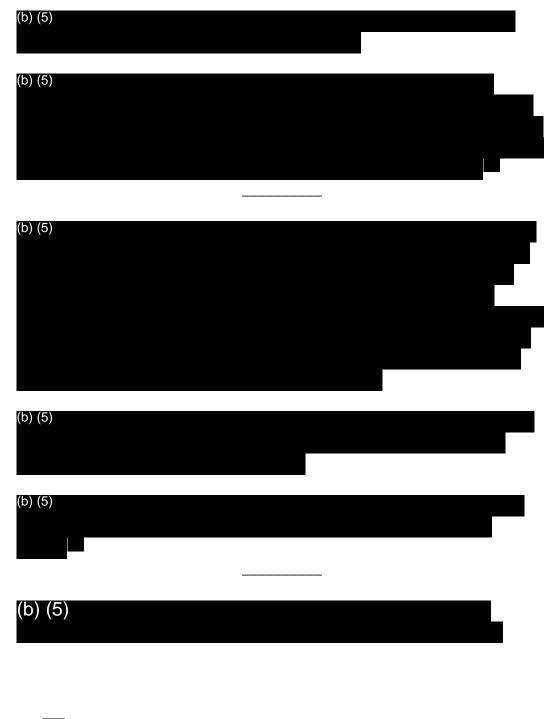
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¹⁰³ Statement
 ¹⁰⁴ Statement

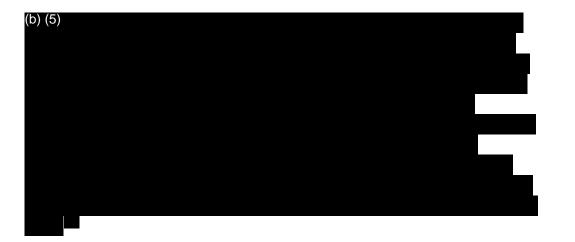
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¹¹¹ Statement¹¹² Statement







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¹¹³ Statement
¹¹⁴ Statement
¹¹⁵ Statement









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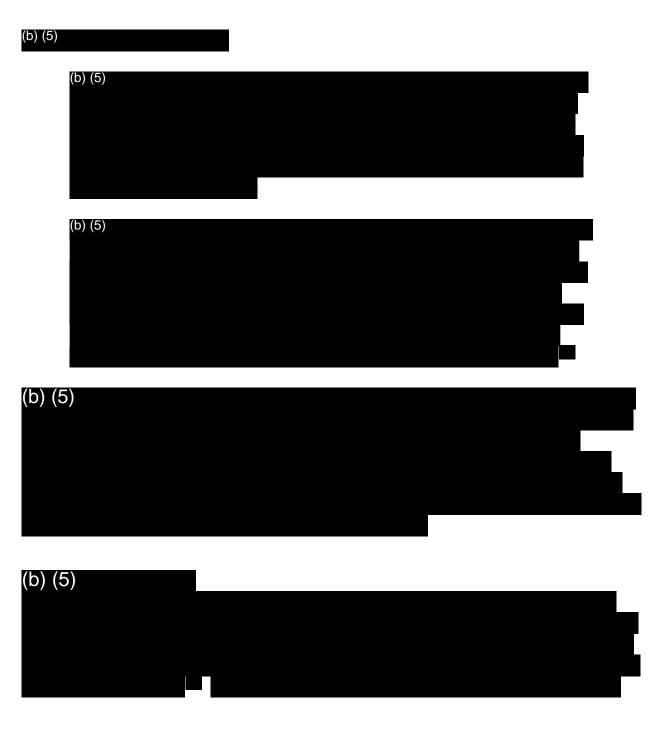
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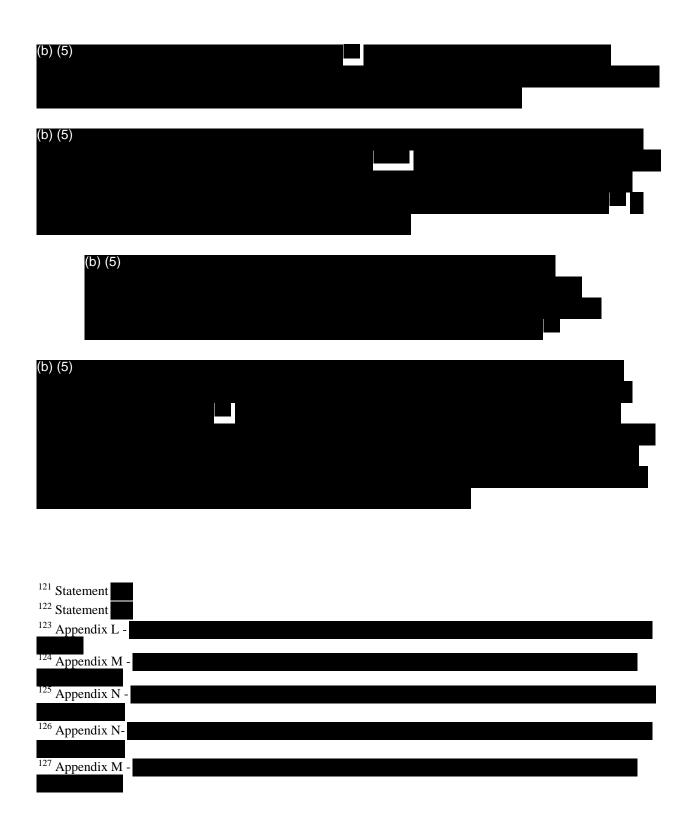
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¹¹⁸ Statement



¹¹⁹ Statement¹²⁰ Statement

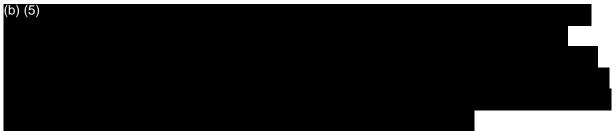


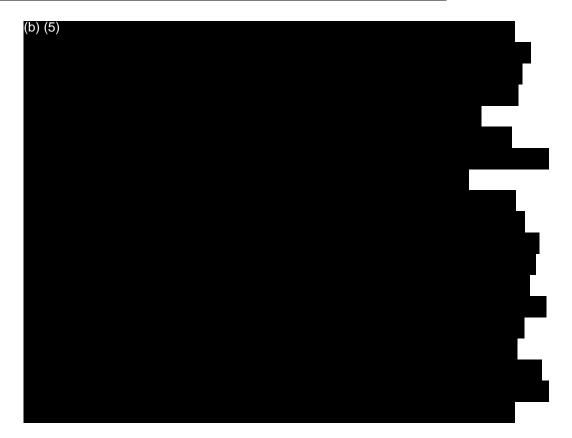












¹³² Statement





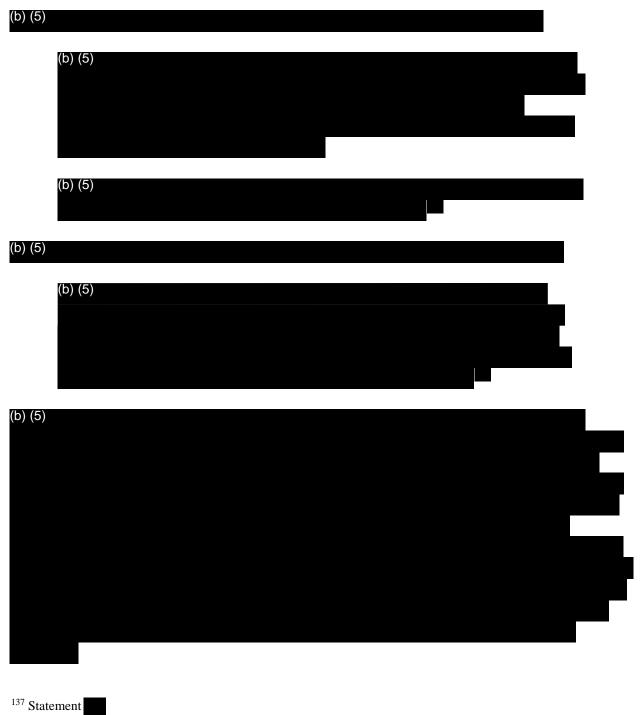




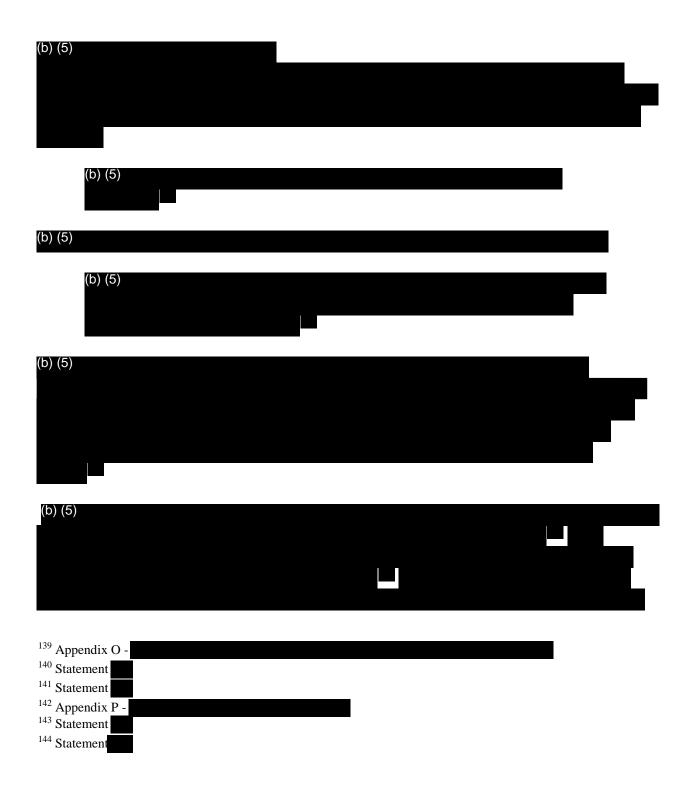
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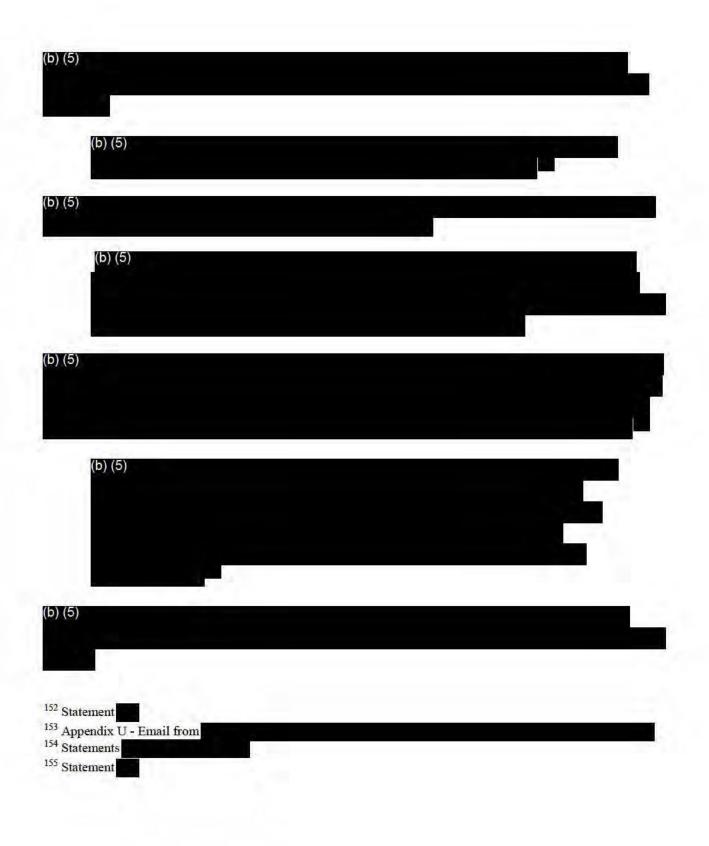
¹³⁸ Statement





¹⁴⁵ Appendix Q - Email from

¹⁴⁶ Appendix R -	
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¹⁴⁹ Appendix S - Email Subject: Fwd:	
¹⁵⁰ Appendix T- Email from to the AIT defining the composition of the	
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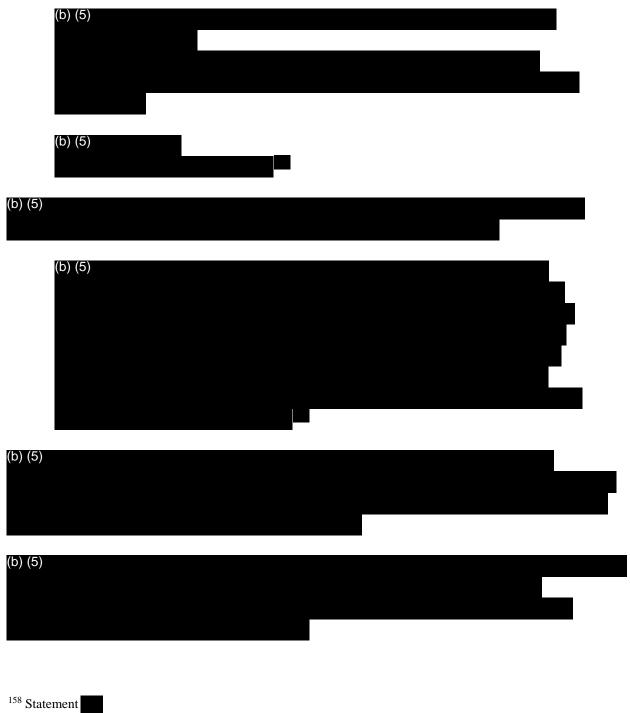




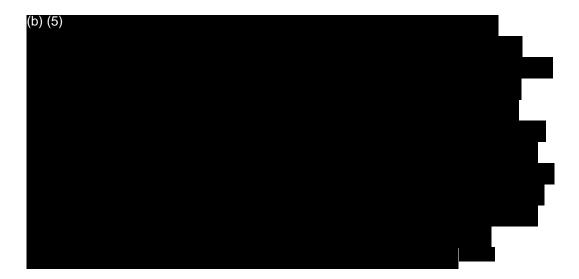




¹⁵⁷ Statement



¹⁵⁹ Statement





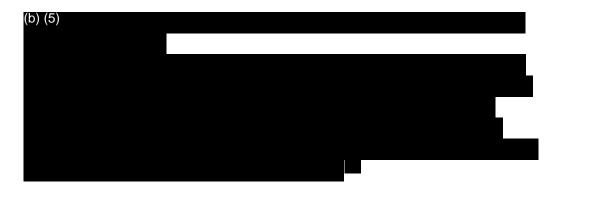


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¹⁶¹ Appendix V - Email thread from

¹⁶² Statement

¹⁶³ Appendix V - Email thread from



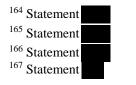






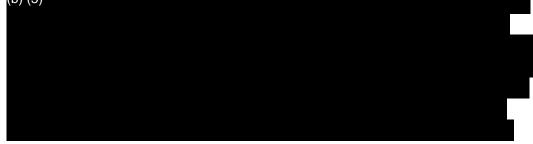






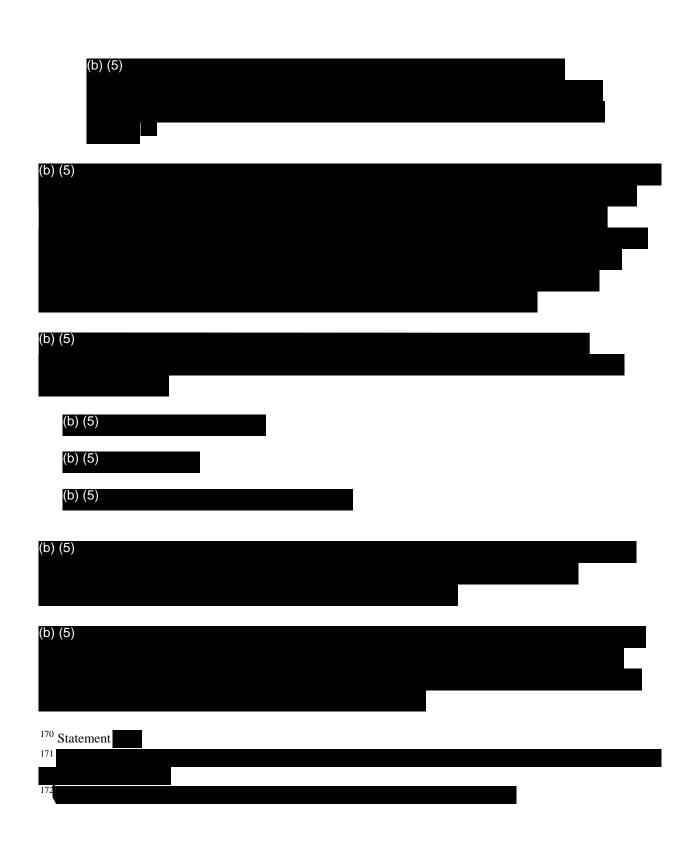
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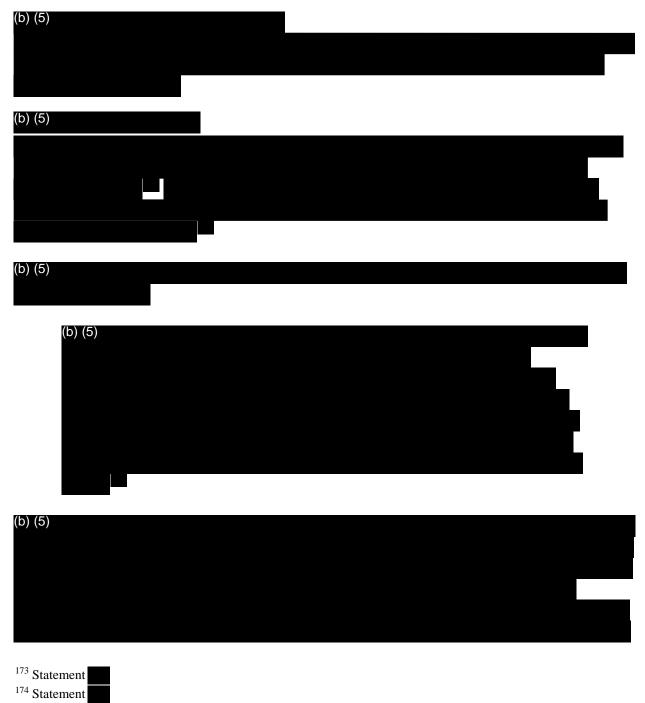
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¹⁶⁸ Appendix K – Anonymous Letter postmarked June 2, 2016

¹⁶⁹ Statement



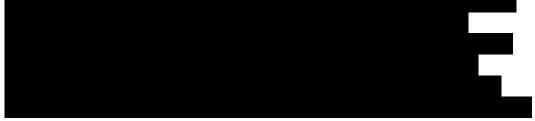


¹⁷⁵ Statement



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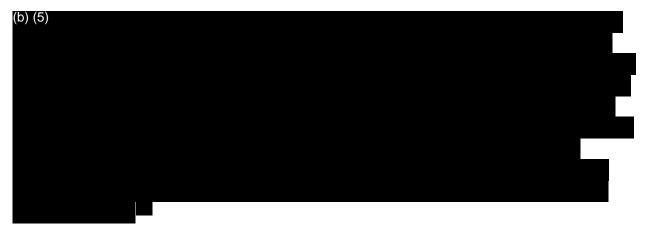


¹⁷⁶ Appendix X - Email thread from	to	Subject: Re:	
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¹⁷⁸ Statement









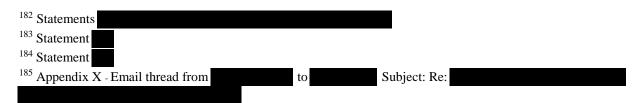
¹⁷⁹ Statement

¹⁸⁰ Appendix Y - FKNMS	
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¹⁸¹ Appendix X - Email thread from	to , Subject: Re:





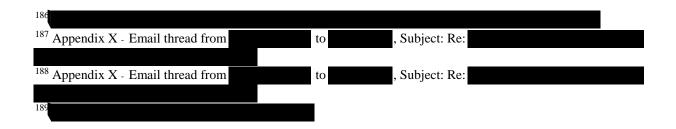






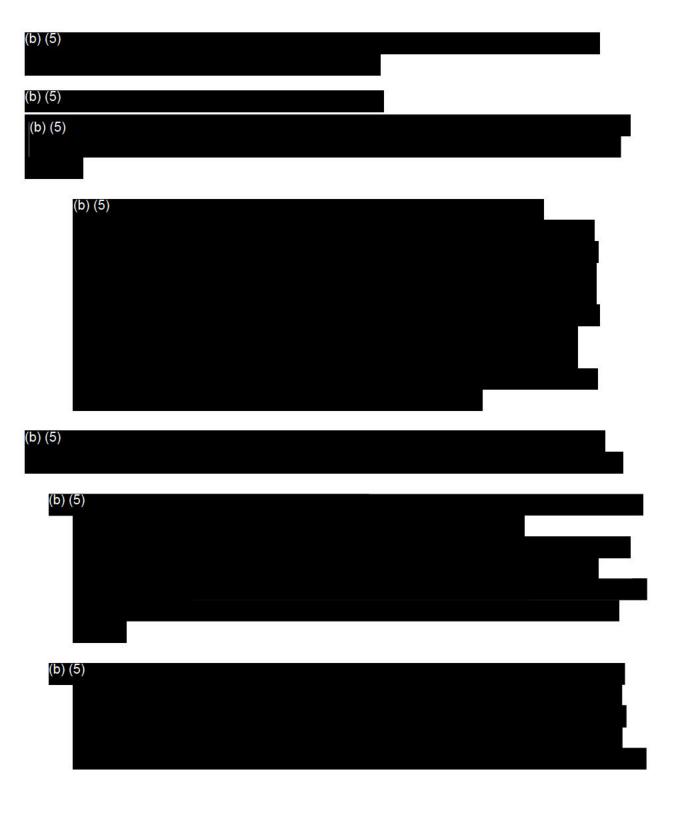




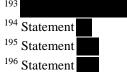


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¹⁹⁰ Statement
¹⁹¹ Appendix Z - ONMS
¹⁹² Statement





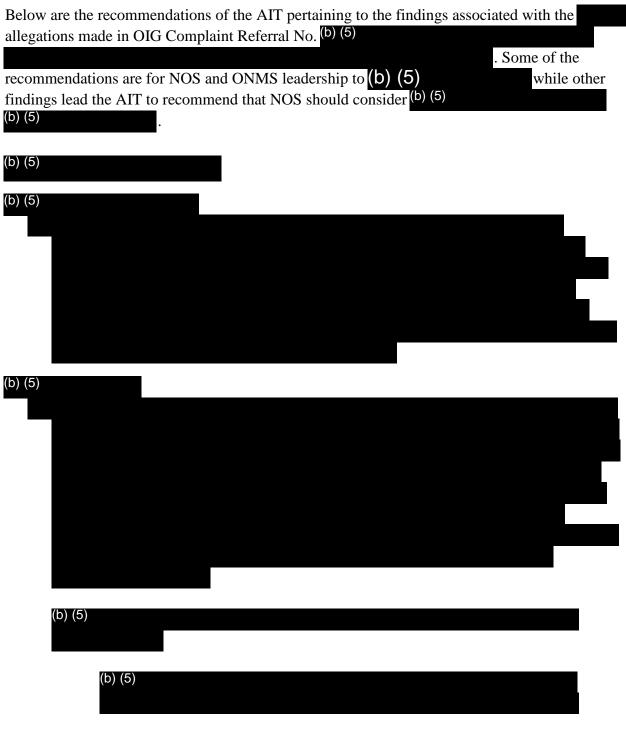


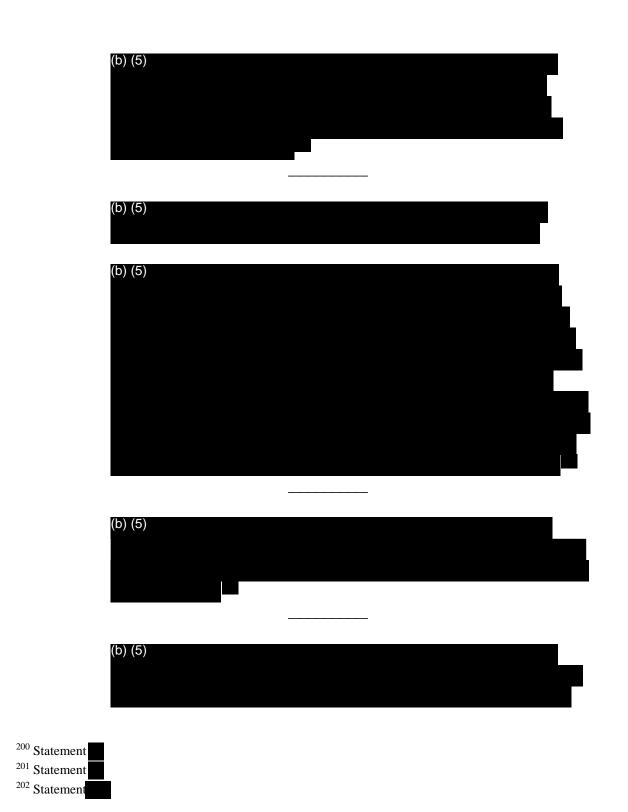
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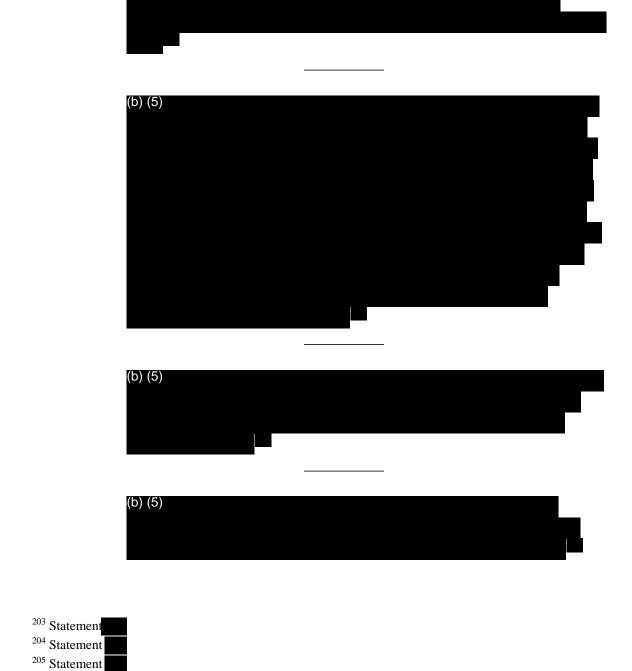
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¹⁹⁷ Statement
¹⁹⁸ Statement
¹⁹⁹ Statement

Recommendations





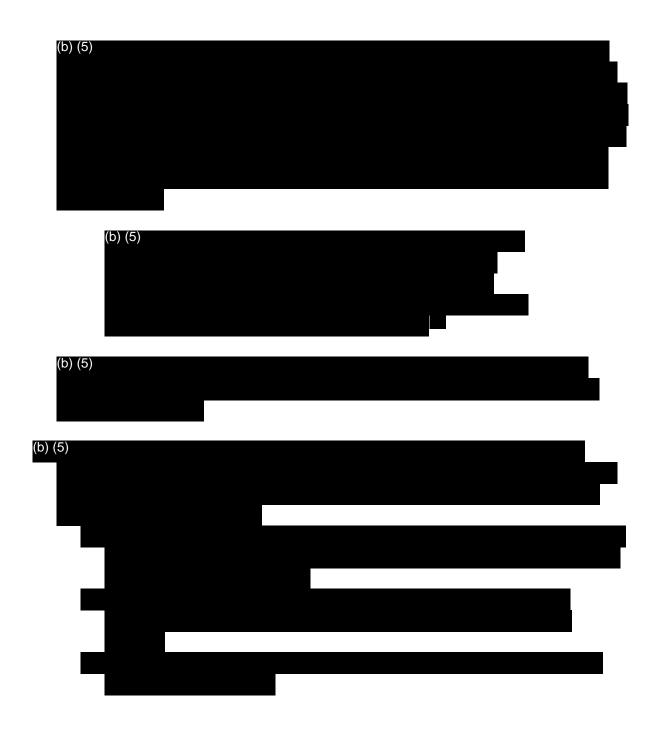


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²⁰⁶ Statement



²¹¹ Appendix AA -



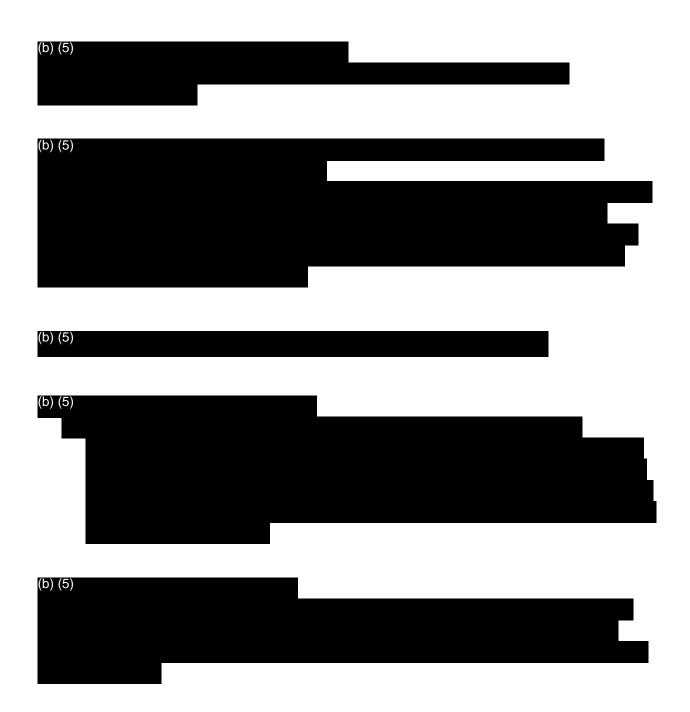
²¹² Statement

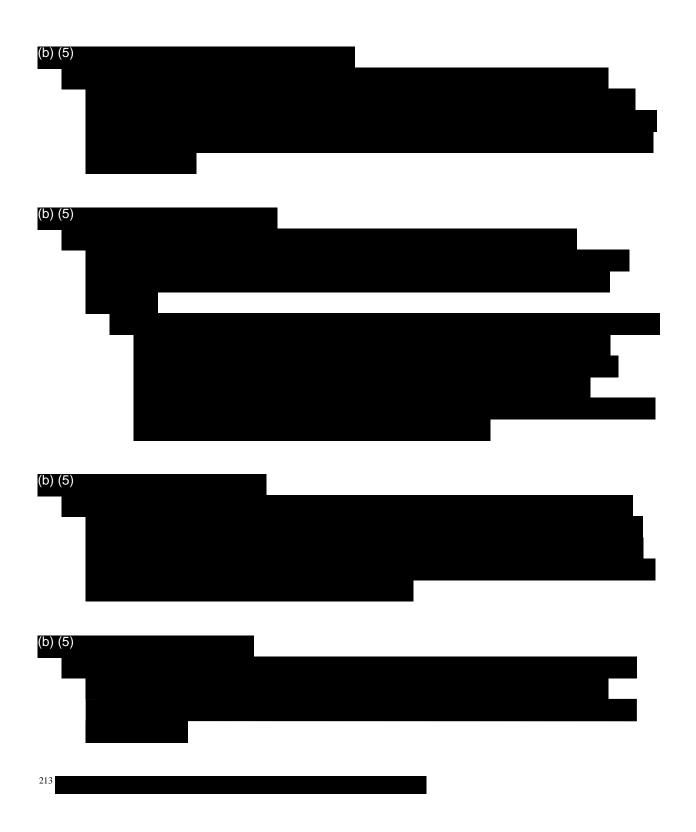


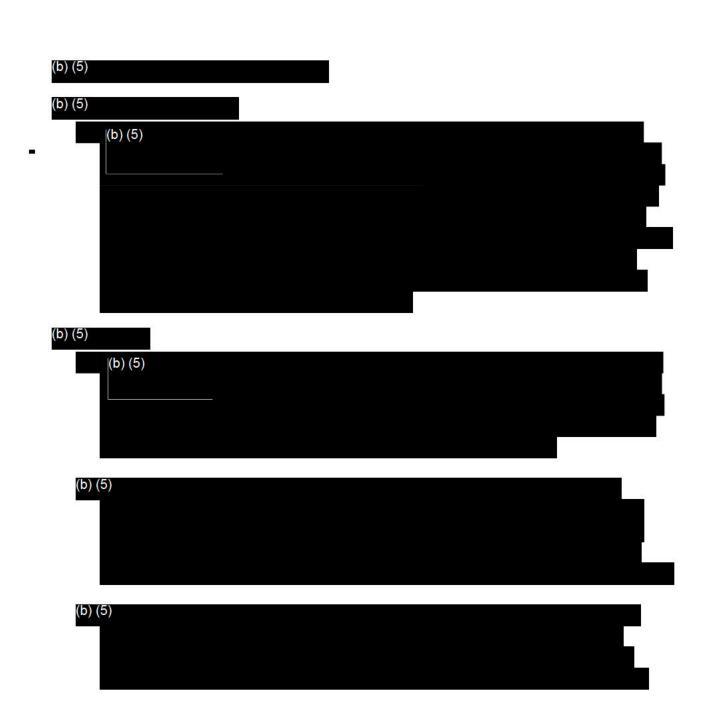


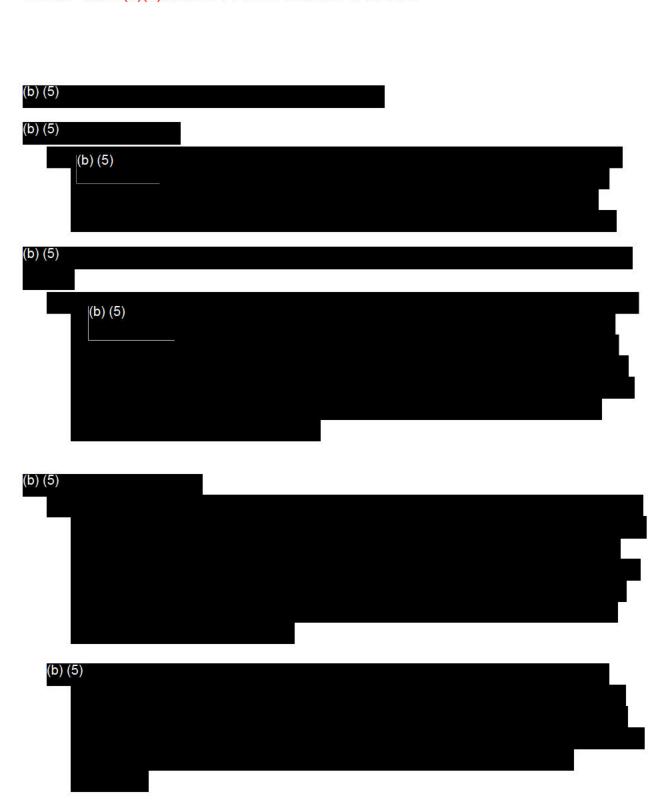


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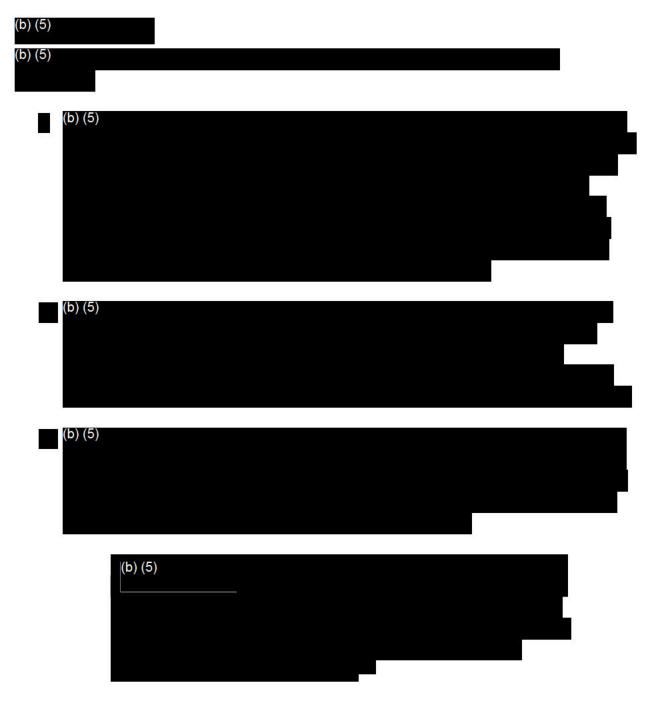


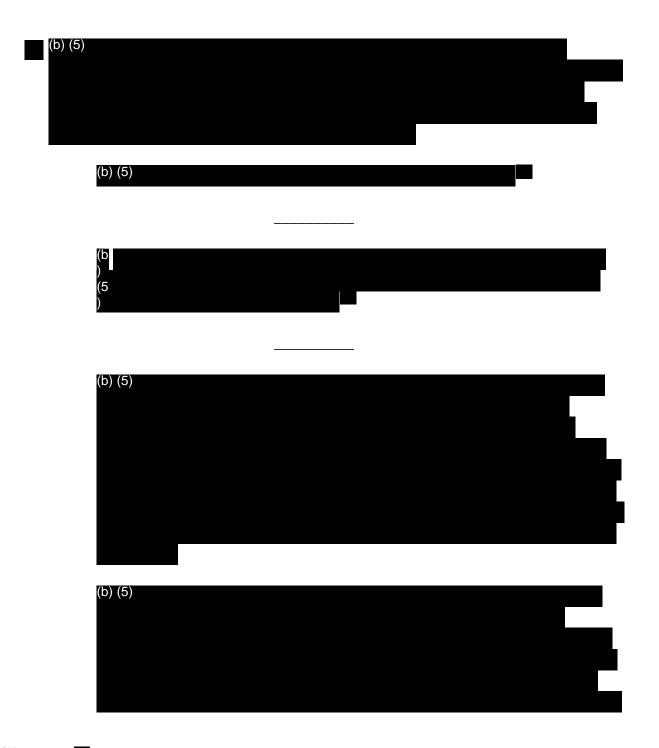




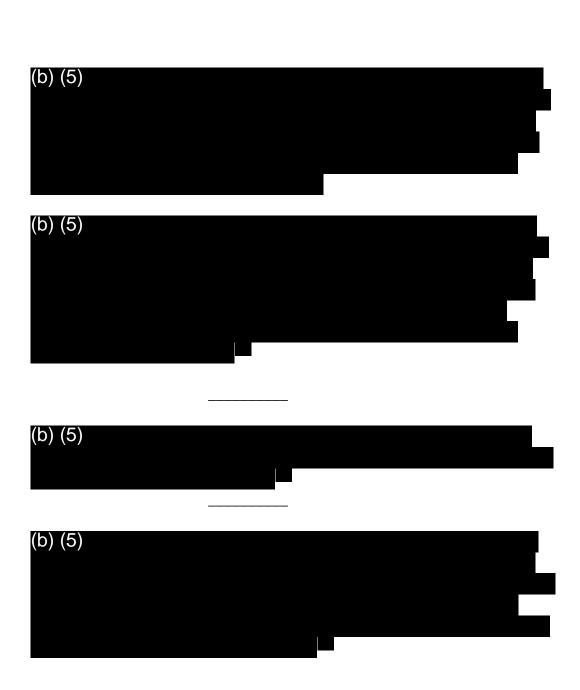


²¹⁴ Statement





²¹⁵ Statement²¹⁶ Statement



²¹⁷ Statement
²¹⁸ Statement
²¹⁹ Statement







Appendix A

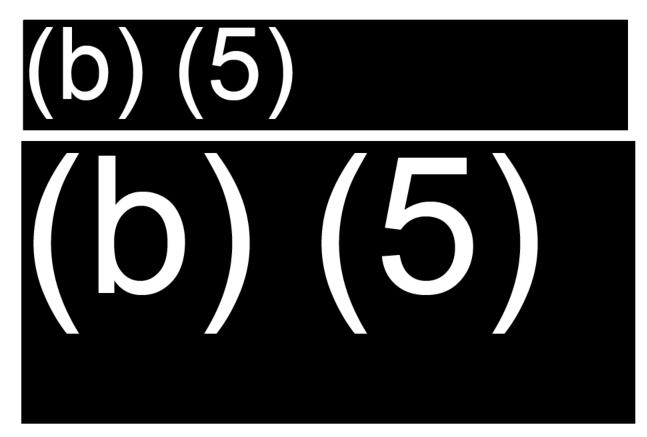
Letter dated March 22, 2016



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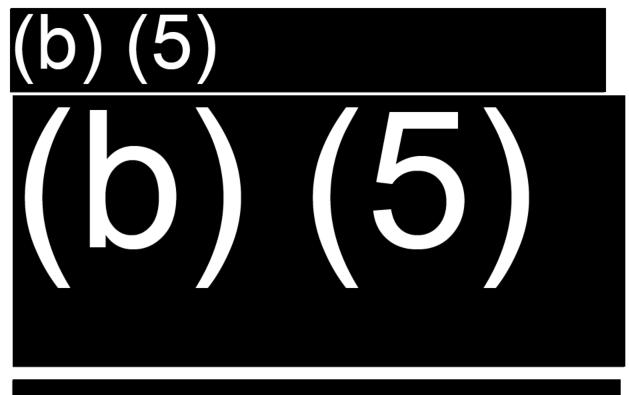
22 March 2016











Sincerely,





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Appendix B

OIG complaint memorandum – Referral No. dated May 16, 2016



UNITED STATES DEPARTMENT OF COMMERCE Office of Inspector General Washington, D.C. 20230

May 18, 2016

MEMORANDUM FOR:

Audits, Internal Control and Information Management National Oceanic & Atmospheric Administration (NOAA)

FROM:

SUBJECT:

OIG Complaint Referral No. Re: (NOAA/NOS)

OIG received a complaint involving matters that, in our assessment, are appropriate for handling by your organization. Please review the attached documentation and conduct an inquiry addressing, at a minimum, the following specific issues/allegations presented in the complaint:

An anonymous complainant alleged that

For guidance on conducting the inquiry, see OIG's *Guide to Conducting Administrative Inquiries*. Please contact our office should the inquiry identify issues substantially different than those presented in this referral, to include information of a potential criminal nature.

Per Department Administrative Order 207-10, please apprise us in writing of the disposition of this referral within 60 days. If the inquiry cannot be completed within 60 days, please provide a written update on its status within 60 days in addition to a written request for an extension of time for completion and response. In the event that an inquiry cannot be completed within 60 days, you must provide us with written updates of your progress every 60 days until the inquiry is completed.

Please note that this memorandum and the attached complaint may contain information covered by the Privacy Act as well as other sensitive or personally identifiable information. Information provided by or about the complainant must be kept in the strictest confidence. The complainant's identity must not be disclosed without his or her consent unless such a disclosure is unavoidable during the course of the inquiry.

Please ensure adherence to all applicable privacy protections in distributing this documentation. In particular, the documentation and information contained therein should be made available to the public only under the terms of the Freedom of Information Act and only after consultation with OIG.

We further note that under the Inspector General Act, Whistleblower Protection Act, and other applicable statutes, agency officials are prohibited from taking any reprisal against an employee for providing information to OIG. OIG takes whistleblower protection very seriously and investigates alleged whistleblower reprisal. OIG has designated a Whistleblower Protection Ombudsman to educate Department of Commerce employees about prohibitions on retaliation for protected disclosures, as well as the rights and remedies against retaliation for protected disclosure. Employees may contact the Whistleblower Protection Ombudsman with any questions or concerns at 202-482-1099 or at wpo@oig.doc.gov.

Thank you for your attention to this matter. If you have any questions or wish to discuss this referral, please call me at

Attachment

cc:

From: Sent: To: Subject:

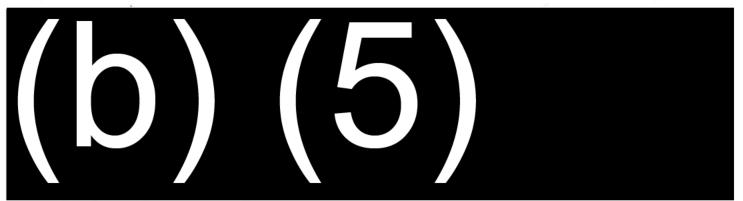
hotline@oig.doc.gov Tuesday, May 03, 2016 6:54 PM DOC OIG Hotline Hotline -

This is a hotline tip submitted via the online form.

Complaint topic: Bureau involved: National Oceanic and Atmospheric Administration Allegation: Violator information:



Allegation information:



Complainant information (if any):

Phone: Fax:



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Appendix C

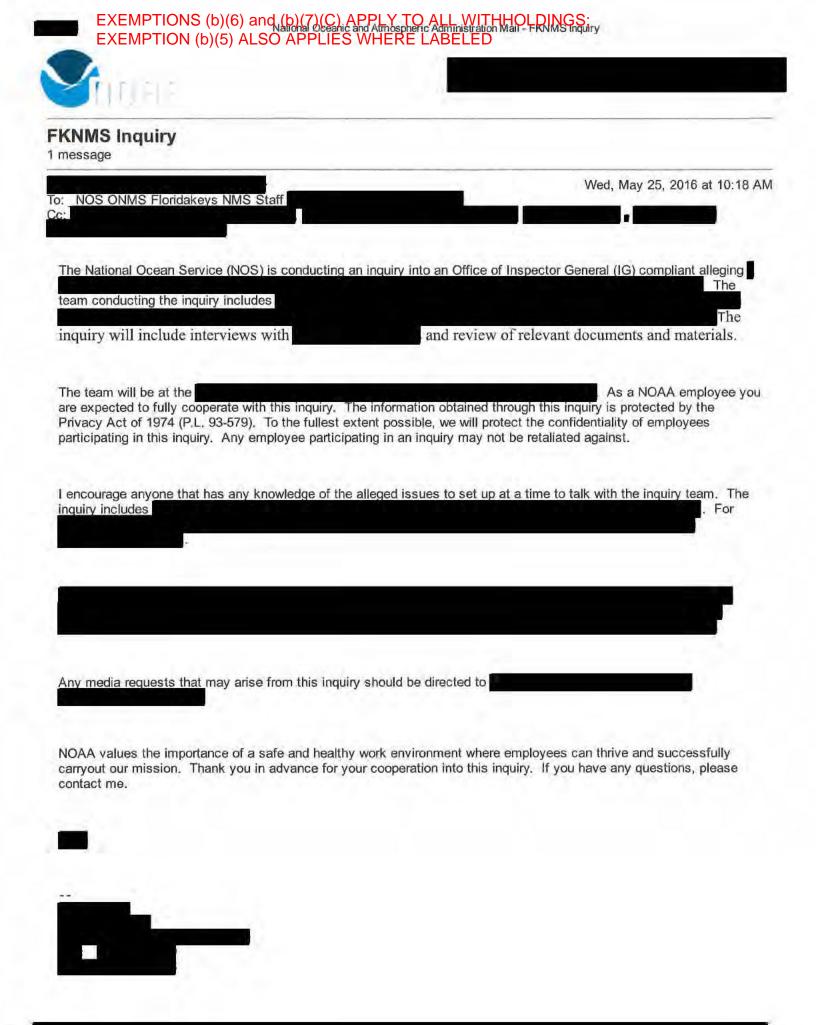


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Appendix D

email to FKNMS staff dated May 25, 2016















Appendix E

AIT Interview Schedule





Appendix F

AIT List of Interviewees (Statements



EXEMPTIONS (b)(6) and (b)(7)(C) APPLY TO ALL WITHHOLDINGS; EXEMPTION (b)(5) ALSO APPLIES WHERE LABELED ADMINISTRATIVE INQUIRY OF FLORIDA KEYS NATIONAL MARINE SANCTUARY OIG COMPLAINT REFERRAL NO.

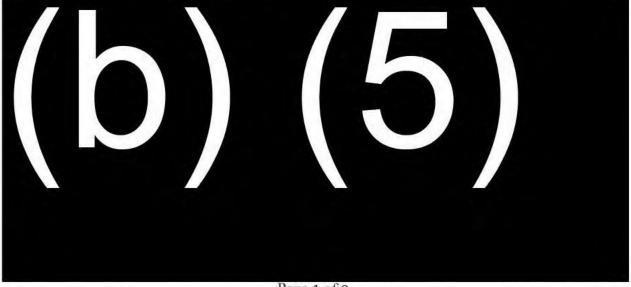
AIT List of Interviewee Statements



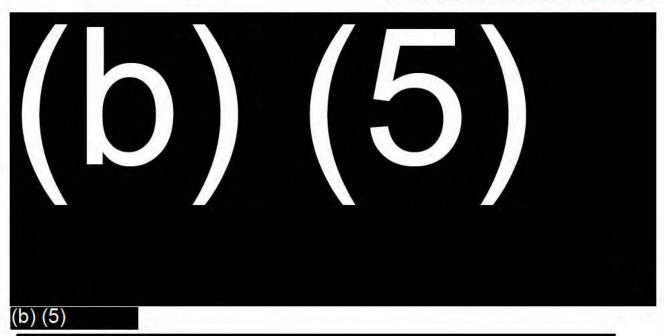
For Official Use Only Confidential: Do not Cite or Circulate

	Statement
Interviewee:	Location:
Interviewer(s):	Date:
Note taker:	Start/End Time:





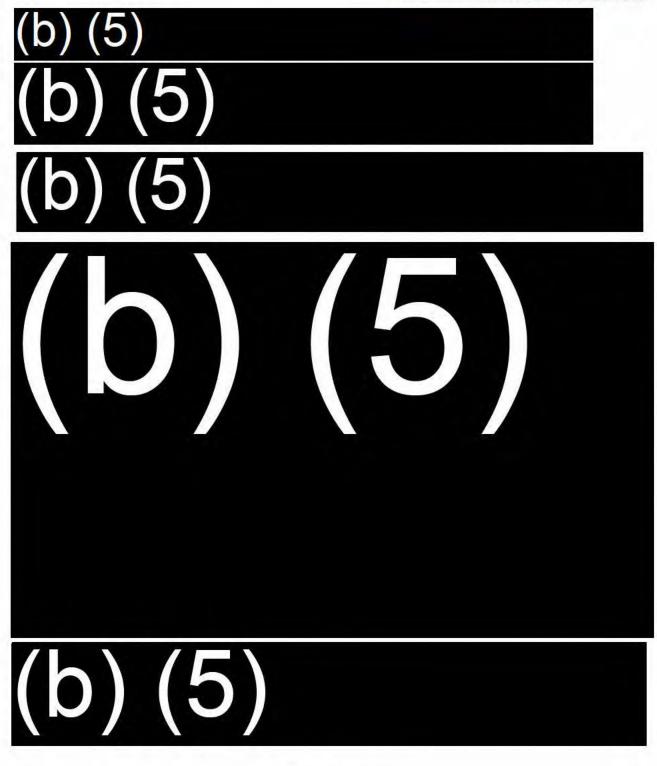
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Page 2 of 8

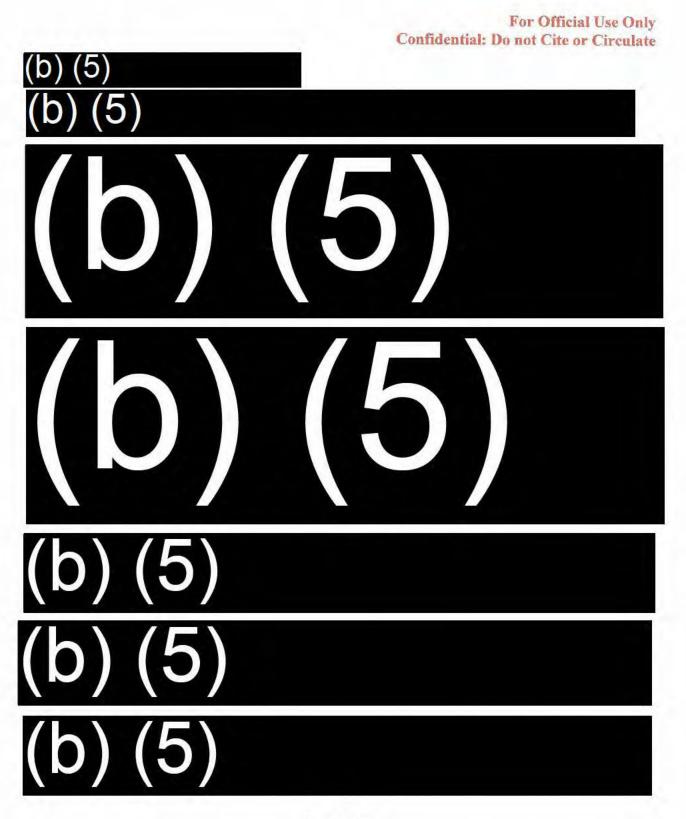
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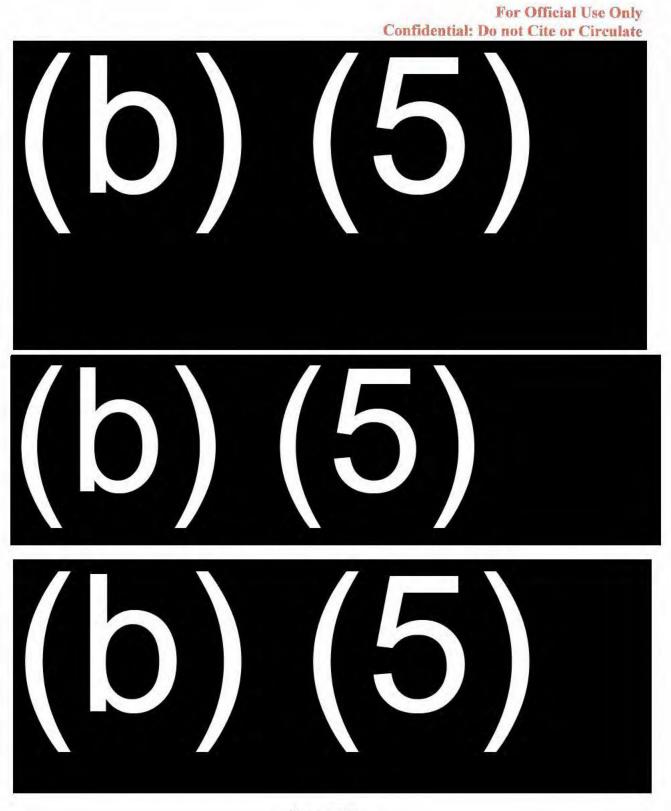
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Page 4 of 8

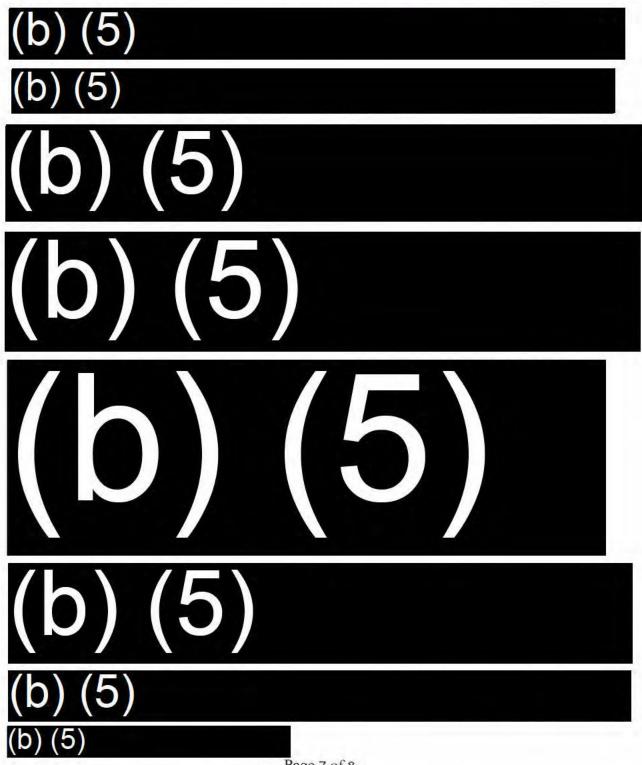


Page 5 of 8



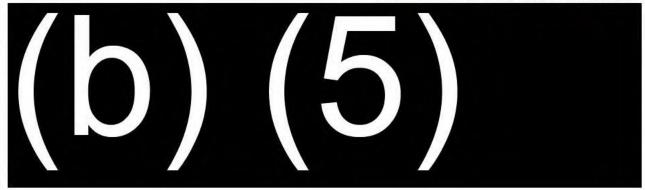
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Page 7 of 8

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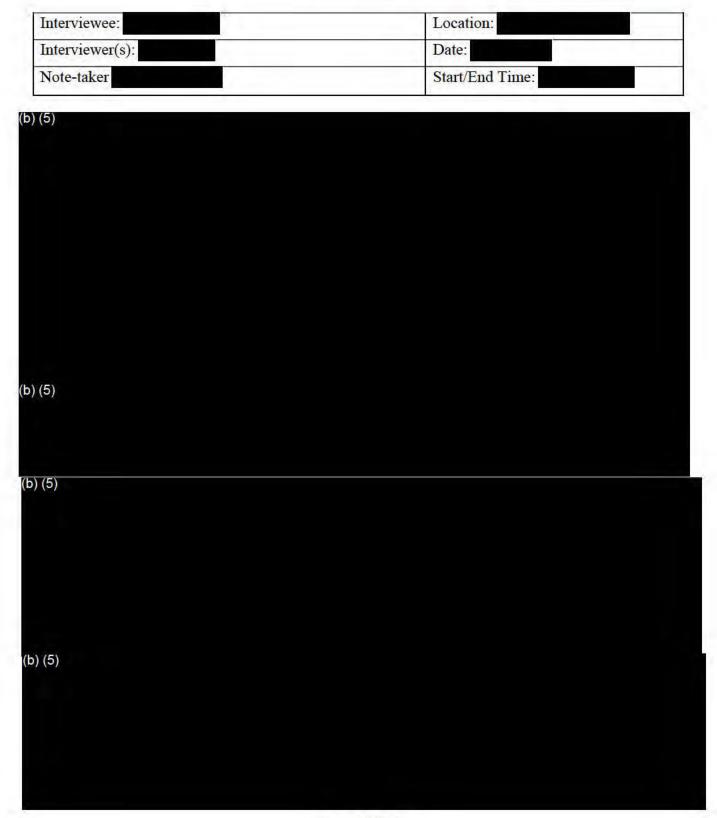


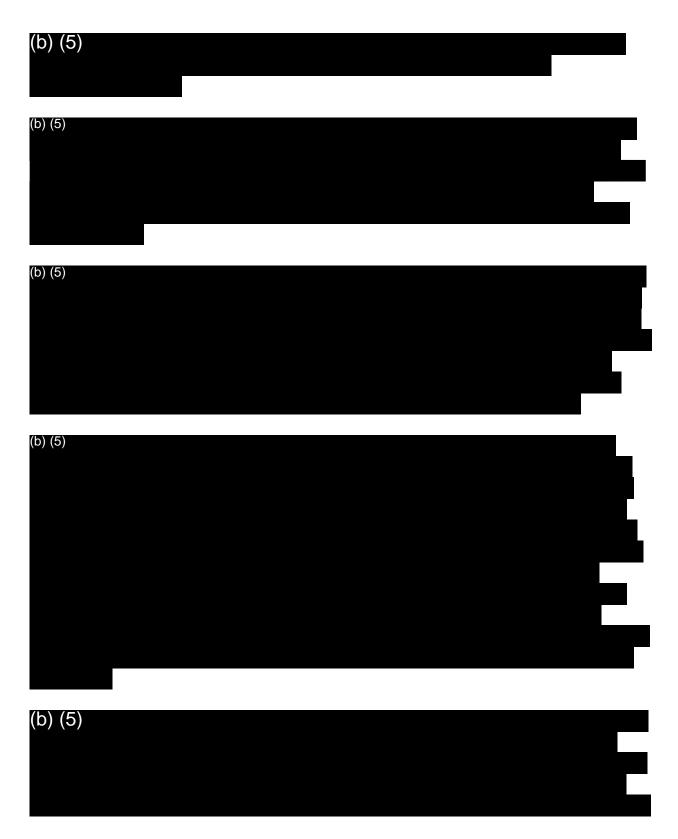
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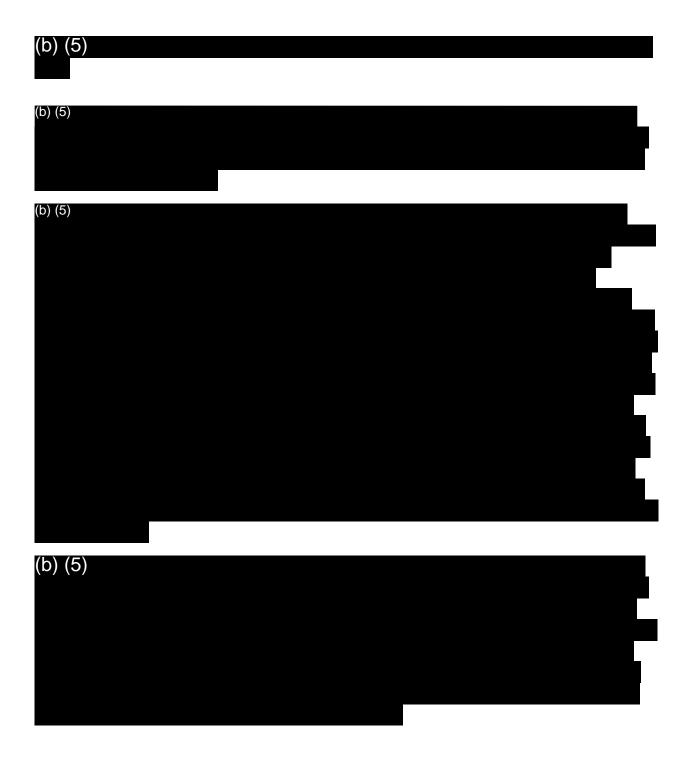
I agree that the statement above accurately reflects the date and to the best of my ability, the conversation that I held with the aforementioned interviewers.

Page 8 of 8











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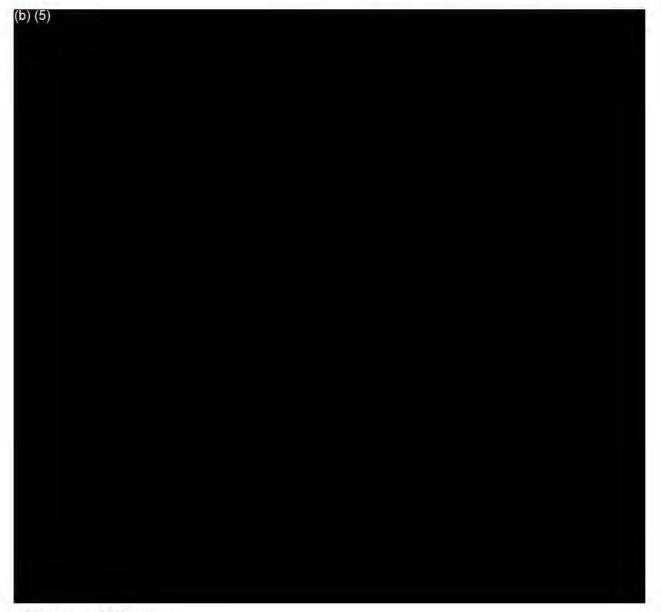
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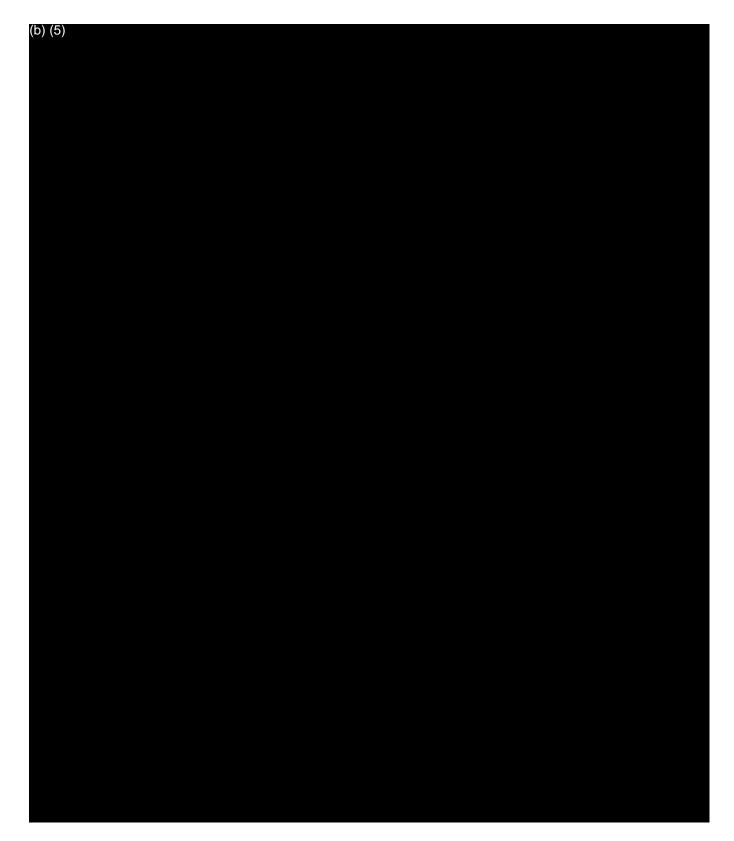
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Signature of Concurrence I agree that the statement above accurately reflects the date and conversation that I held with the aforementioned interviewers

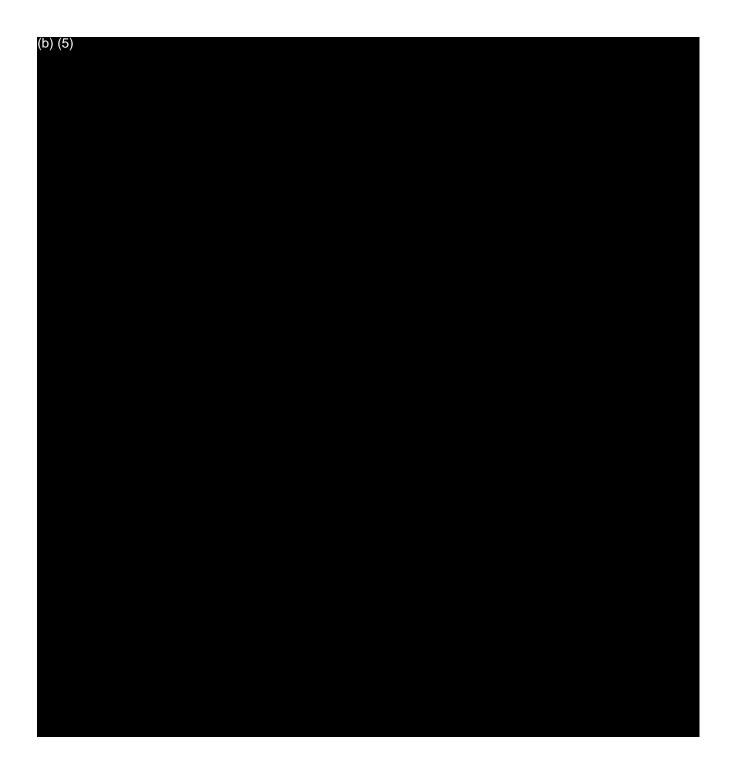
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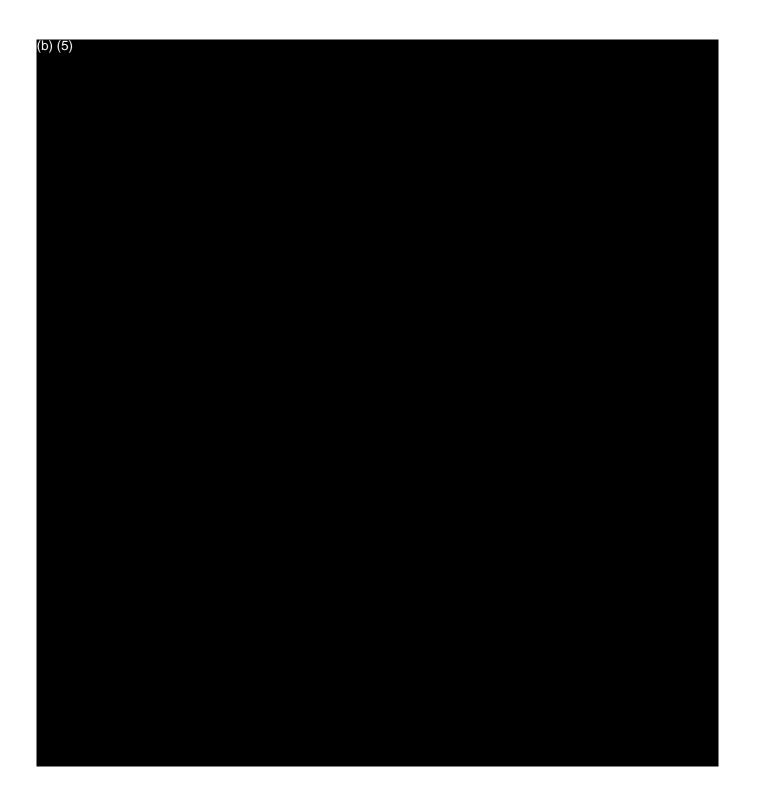


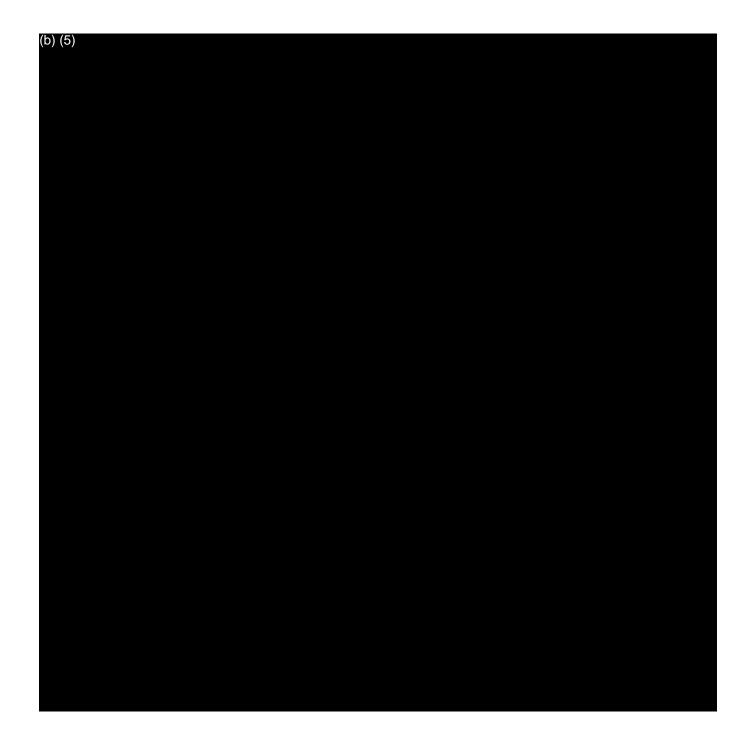


Interviewee:	Location:
Interviewer(s):	Date:
Note-taker:	Start/End Time:

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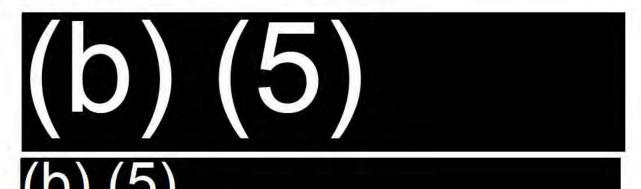
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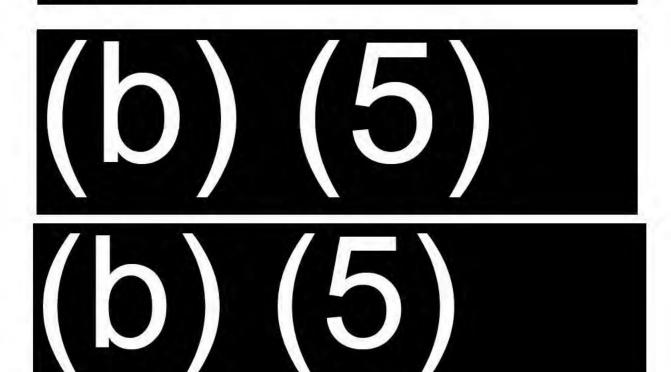
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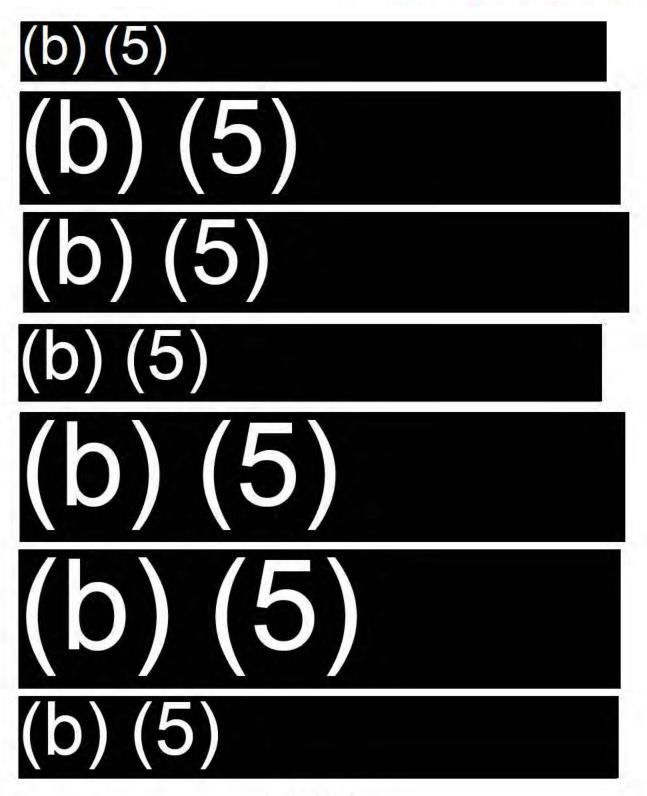
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Pre-scheduled or Walk-in:	End Time:





Page 1 of 7

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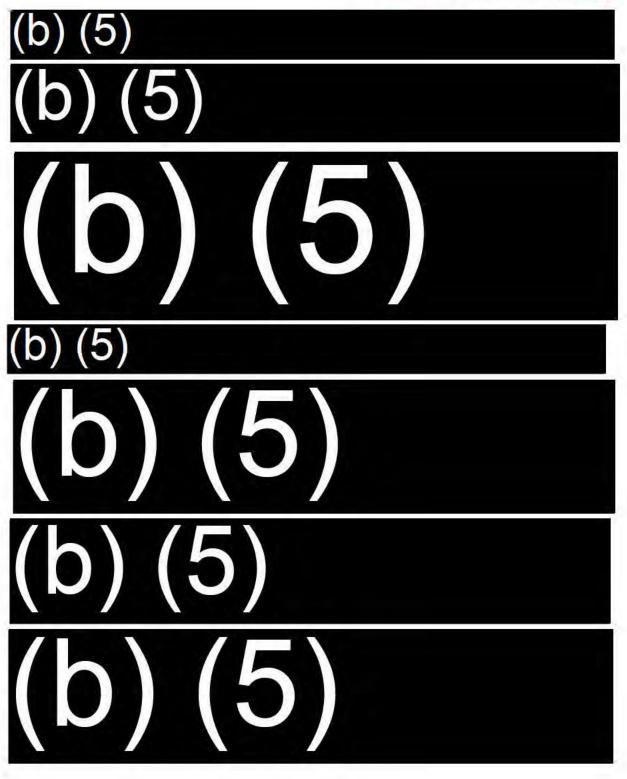


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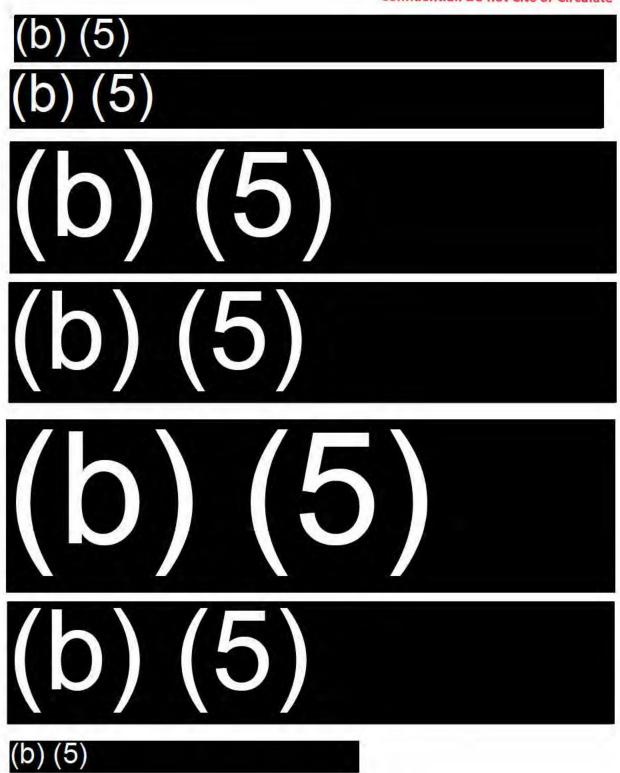
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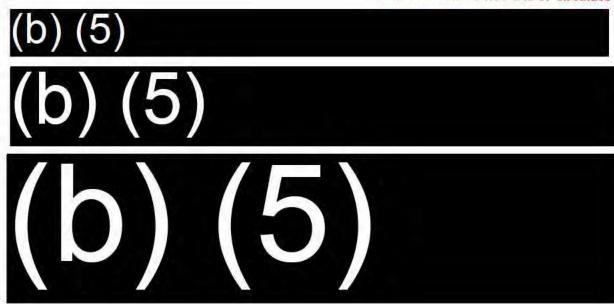
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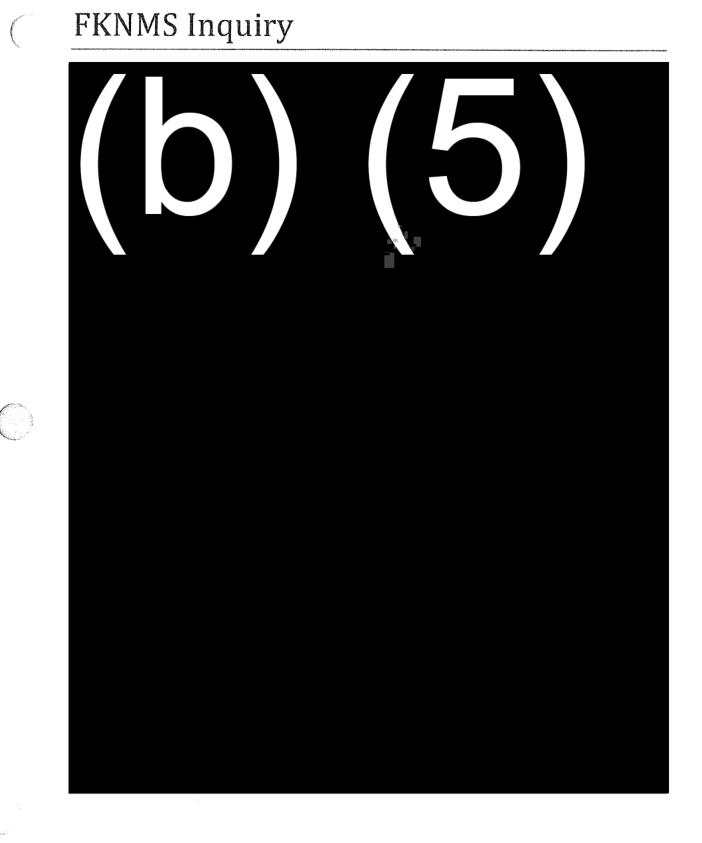


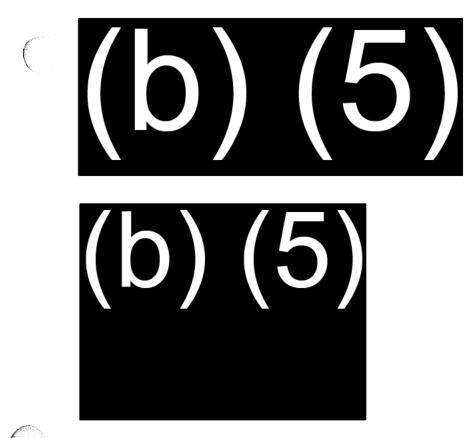
Signature of Concurrence

I agree that the statement above accurately reflects the date and conversation that I held with the aforementioned interviewers.



Signature

















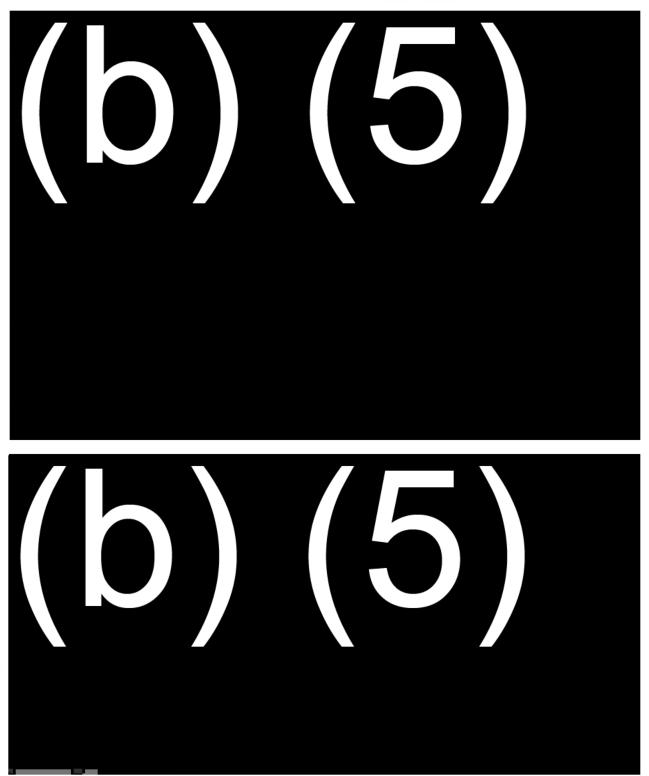


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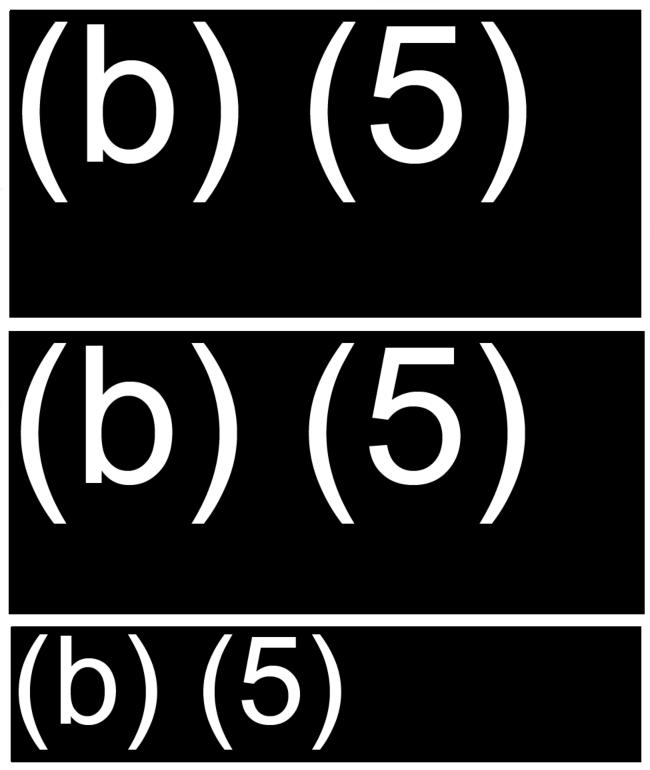
Page 1 of 9

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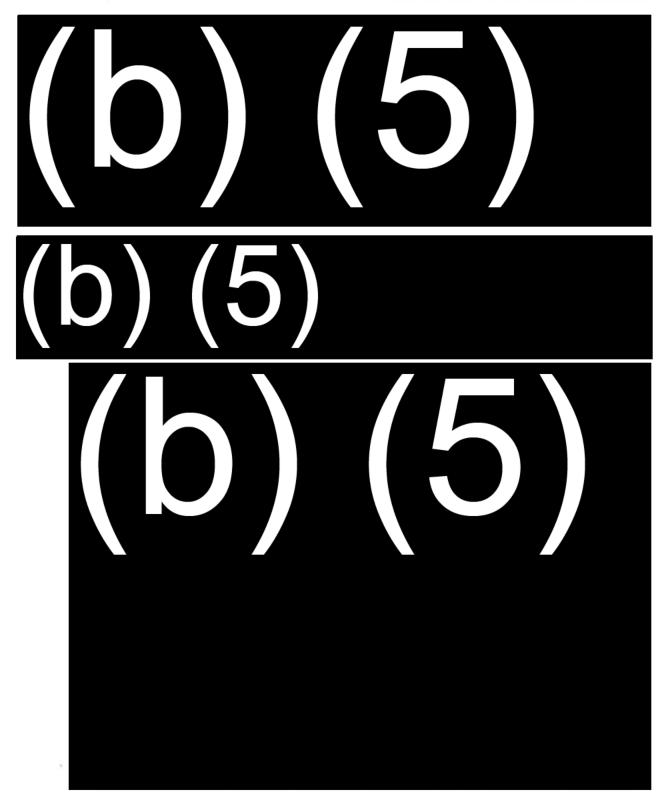
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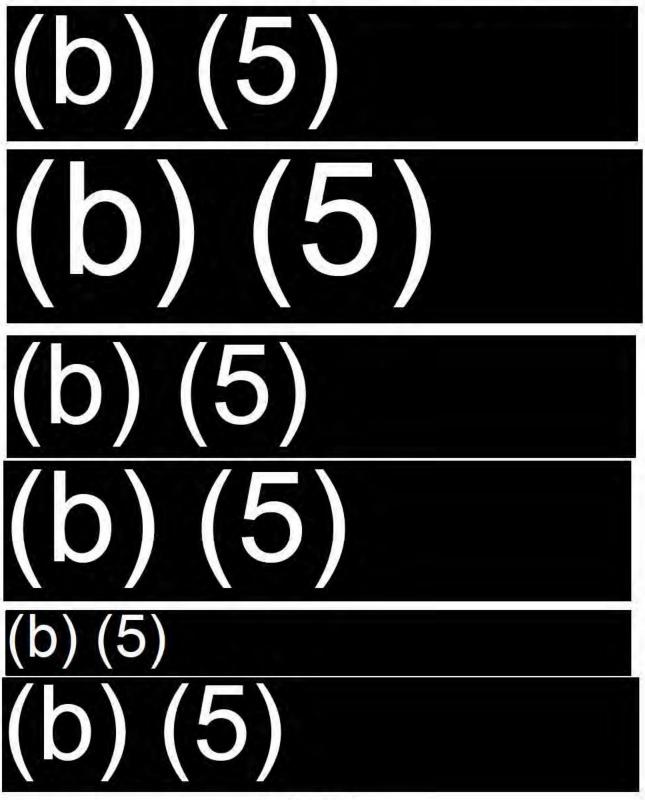
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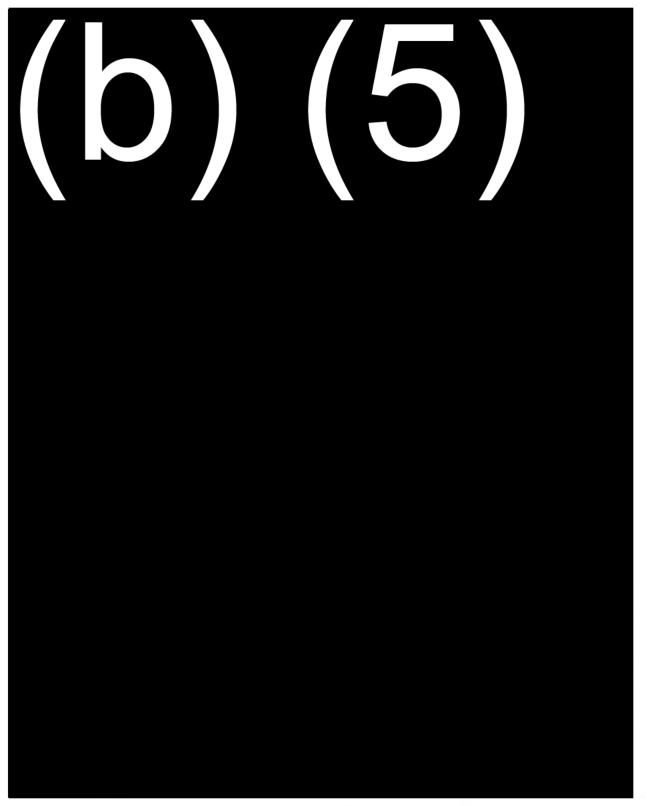
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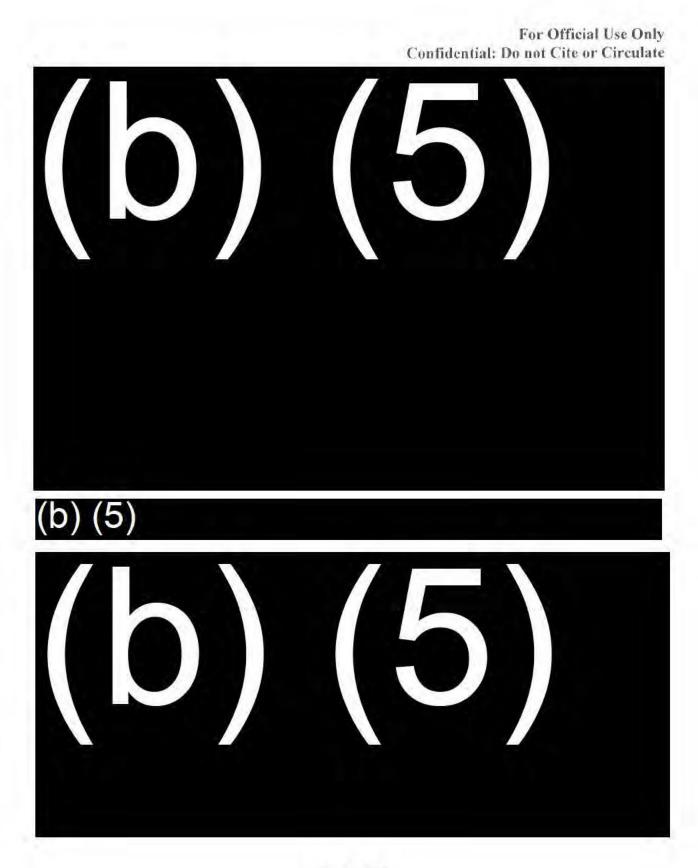
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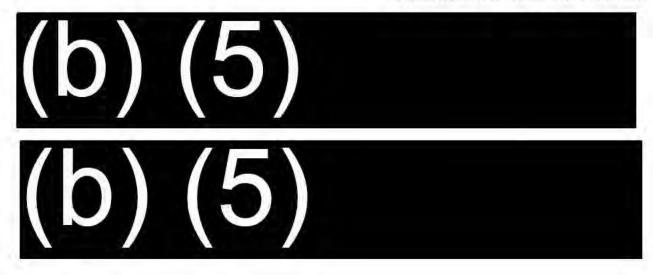
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Signature of Concurrence

I agree that the statement above accurately reflects the date and conversation that I held with the aforementioned interviewers.

Page 9 of 9



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ADMINISTRATIVE INQUIRY OF FLORIDA KEYS NATIONAL MARINE SANCTUARY OIG COMPLAINT REFERRAL NO.

STATEMENT COVER PAGE

The following statement is:

UNSIGNED

The interviewee of the following statement failed to return his/her statement to the Administrative Investigative Team (AIT) signed. Several attempts were made to supply the interviewee with an opportunity to review, edit and submit his/her statement. Each interviewee was sent their draft statement and given the opportunity to review and edit. Interviewees were also given the opportunity to submit an addendum to the statement if they recalled any additional information after the interview, or if they wanted to submit additional supporting documentation.

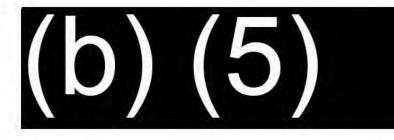
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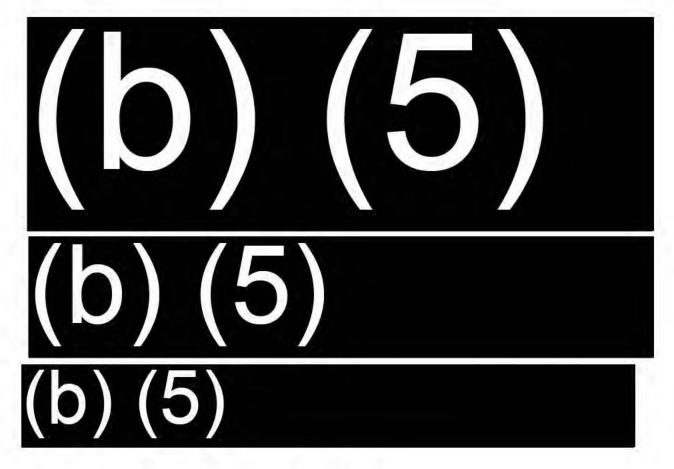
The interviewee of the following statement altered the substantive content of the interview as captured in the original draft statement. This determination was made by consensus of the entire AIT. Therefore, the interviewee's track changes version along with the original version and edited signed version are included in this report in order to accurately represent those differences. Interviewees that submitted edits such as these have been made aware that both versions are included in this final report. Where quotes from the interviewee's statement are excerpted in the Findings or Recommendations section of the AIT's report, they are drawn from the signed version of the statement.

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Statement

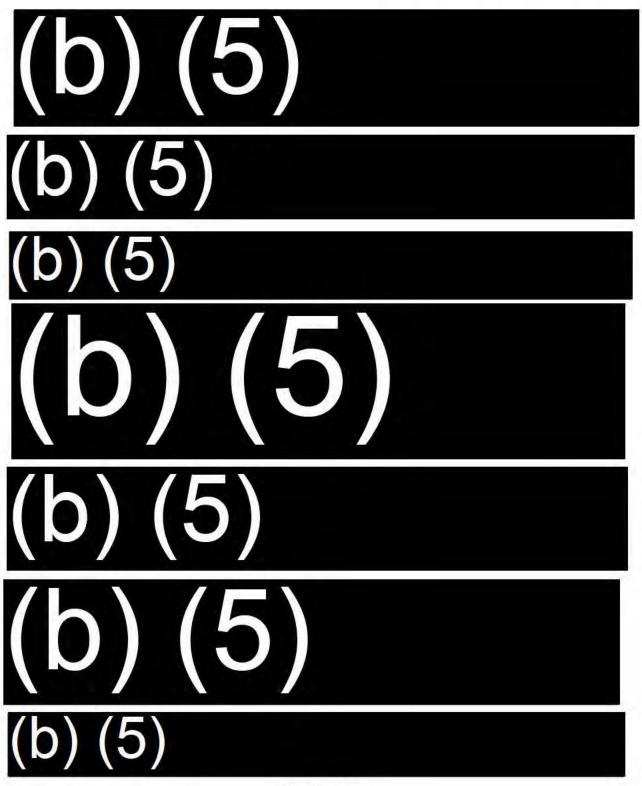
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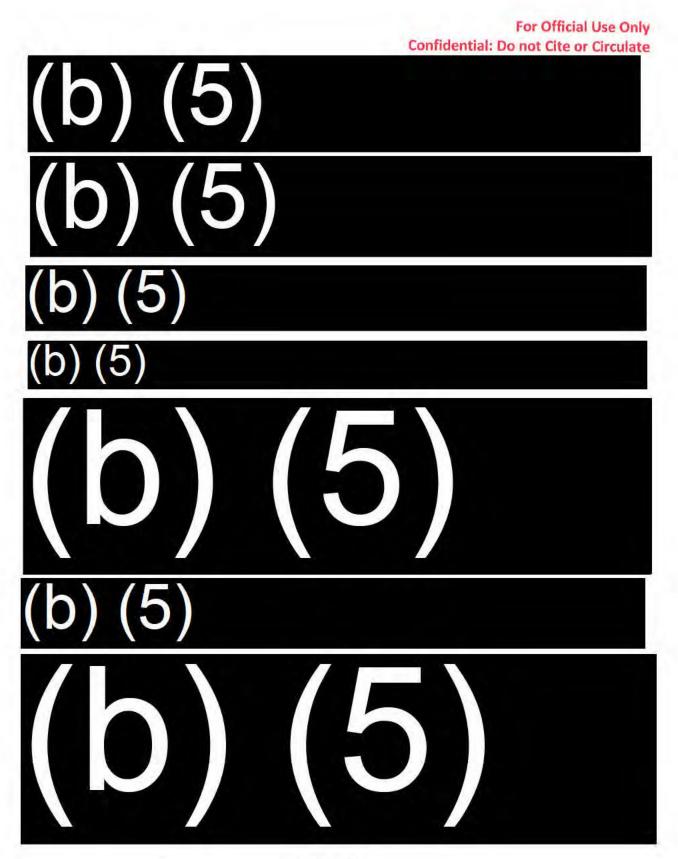


Page 1 of 6

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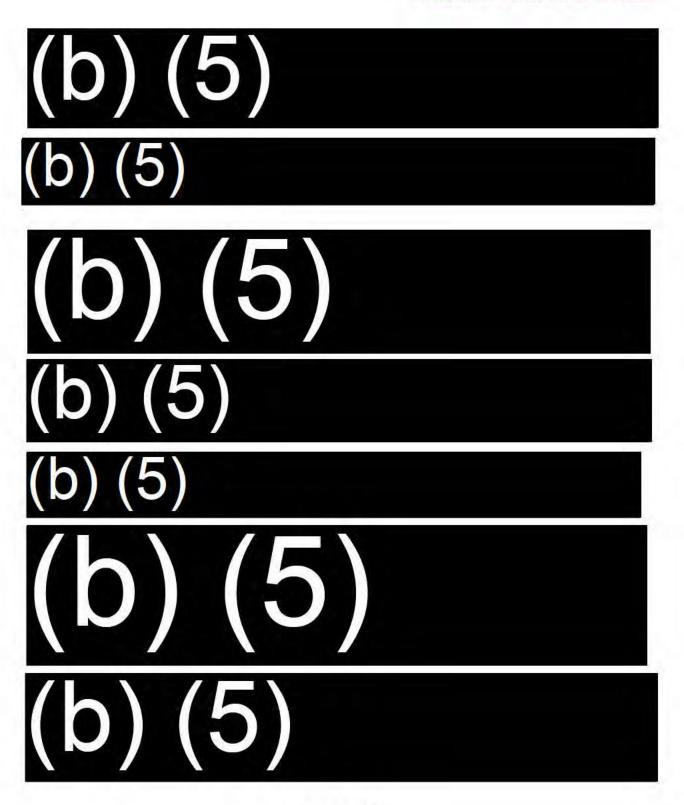


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Page 4 of 6

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Signature of Concurrence

I agree that the statement above accurately reflects the date and conversation that I held with the aforementioned interviewers.

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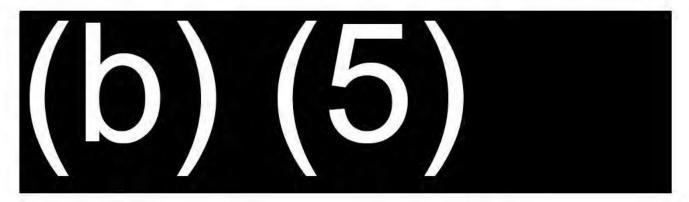
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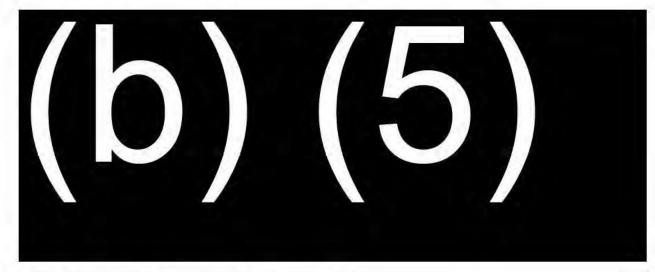
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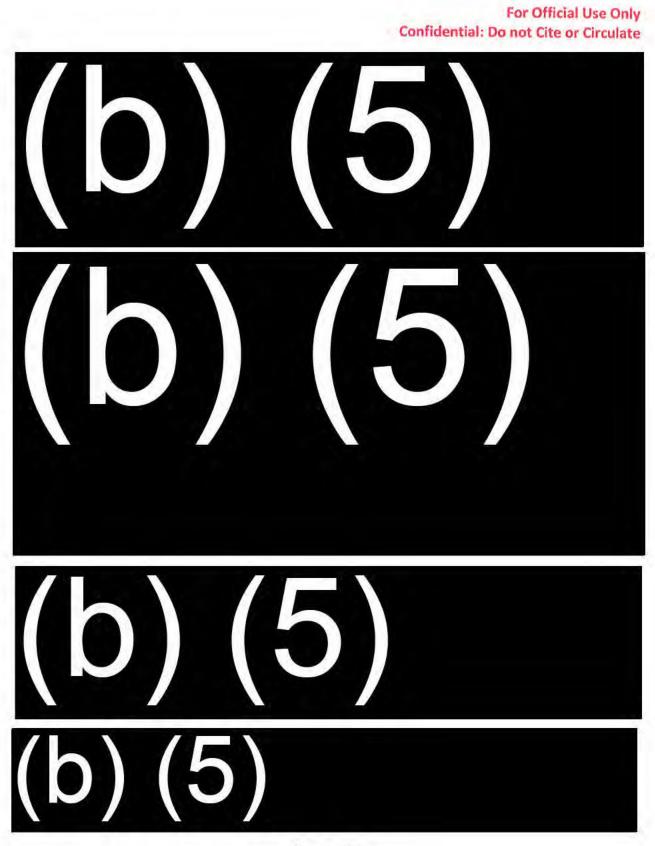
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Interviewer(s):	Date:
Note taker:	Start Time:
Pre-scheduled or Walk-in:	End Time





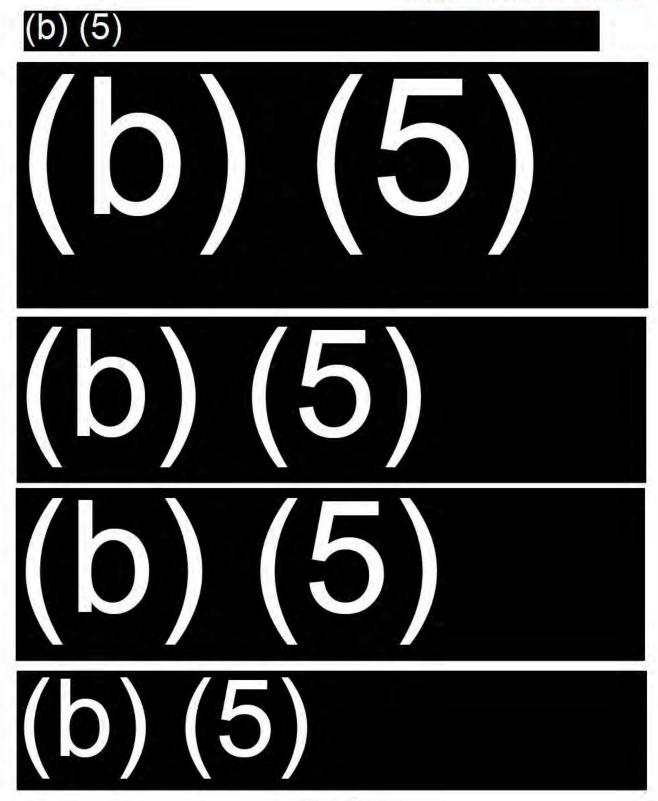


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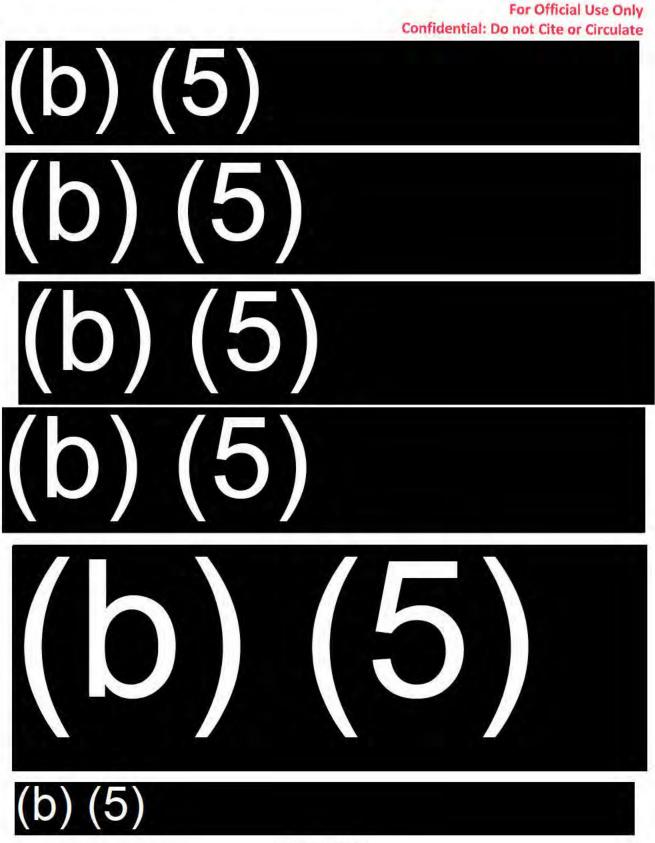


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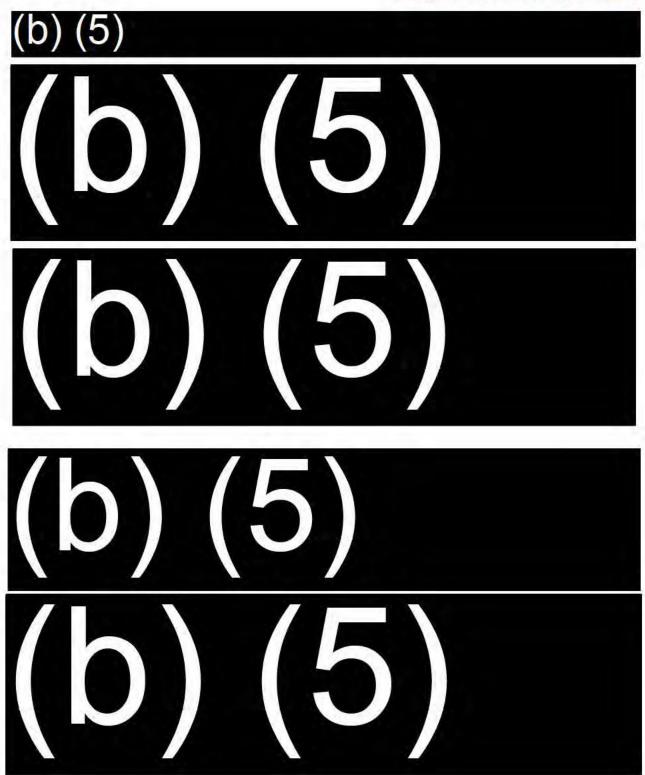


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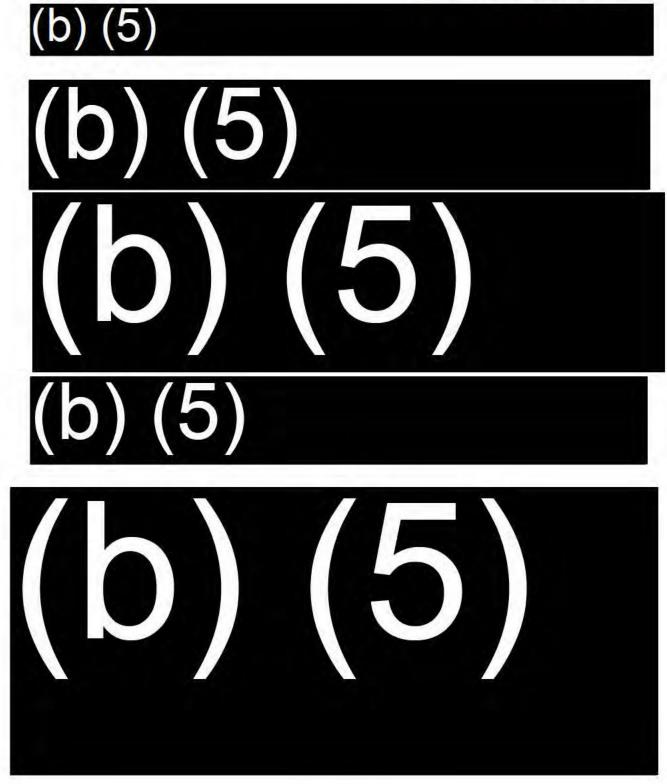
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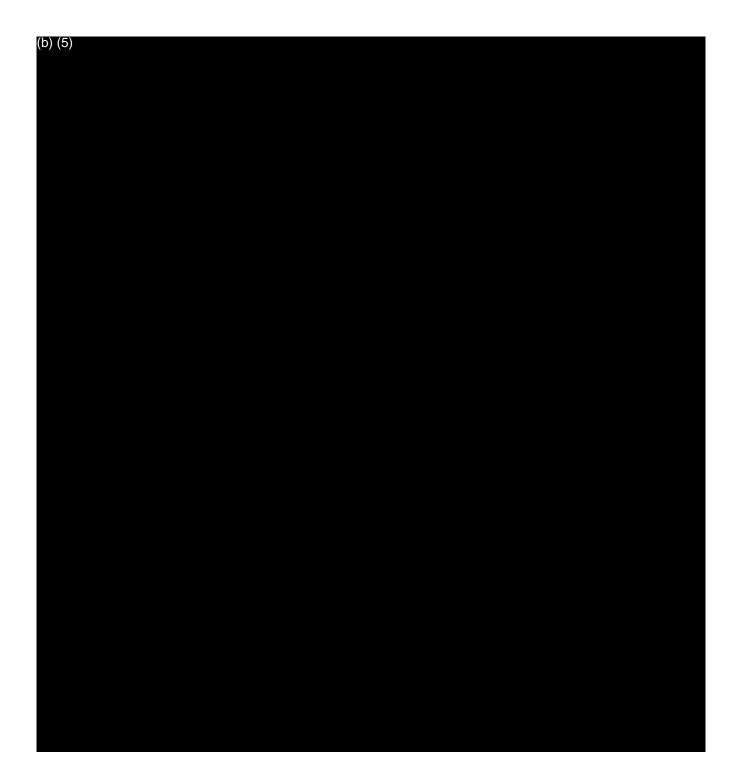
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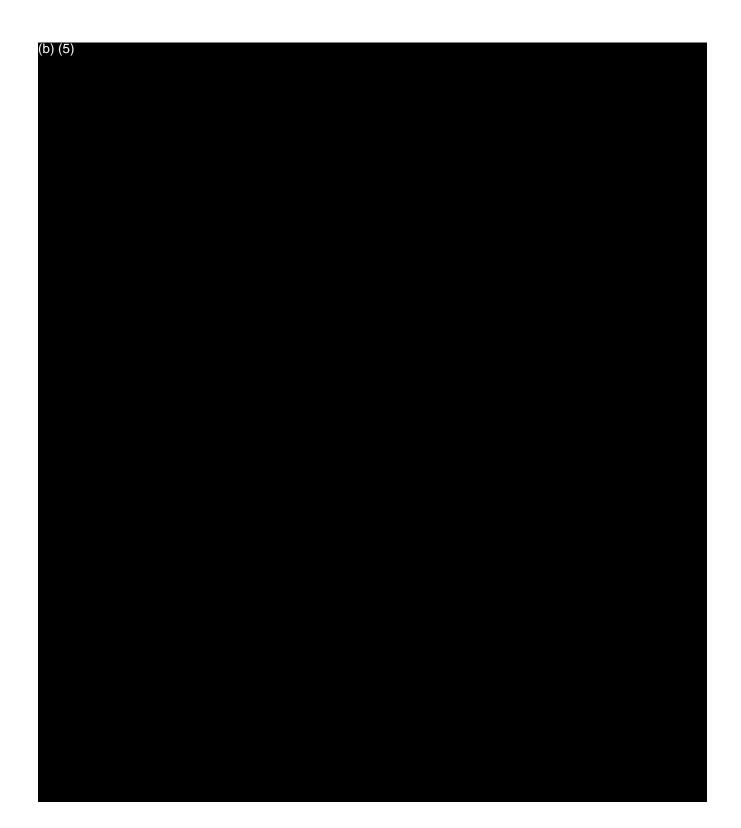
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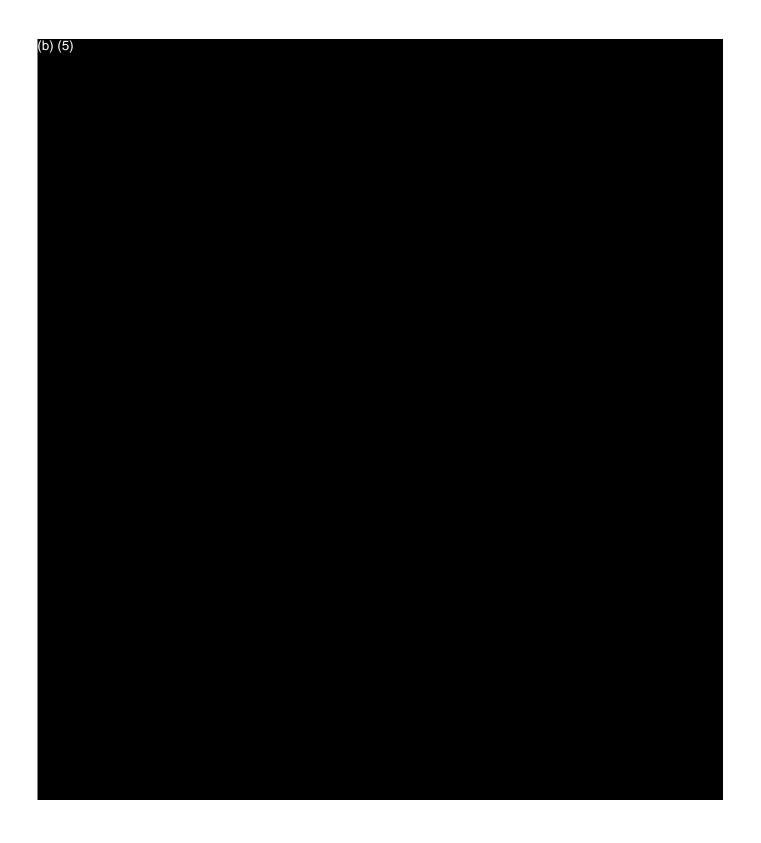


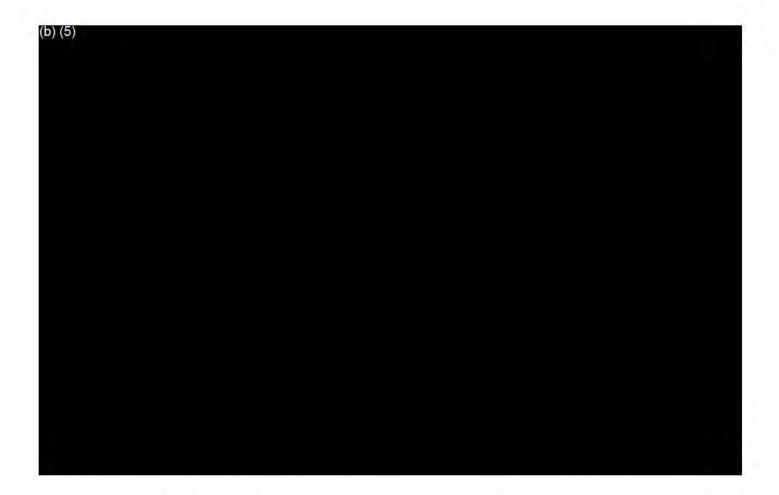
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Signature of Concurrence I agree that the statement above accurately reflects the date and conversation that I held with the aforementioned interviewers.





	Statement
Interviewee:	Location:
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Note taker:	Start Time:
Pre-scheduled or Walk-in:	End Time:

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Signature of Concurrence

I agree that the statement above accurately reflects the date and conversation that I held with the aforementioned interviewers.



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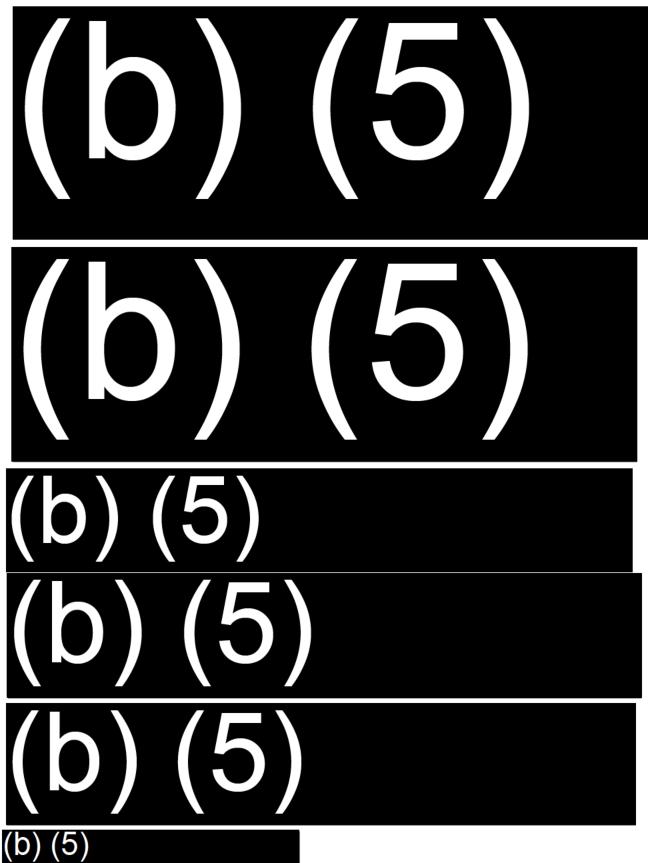
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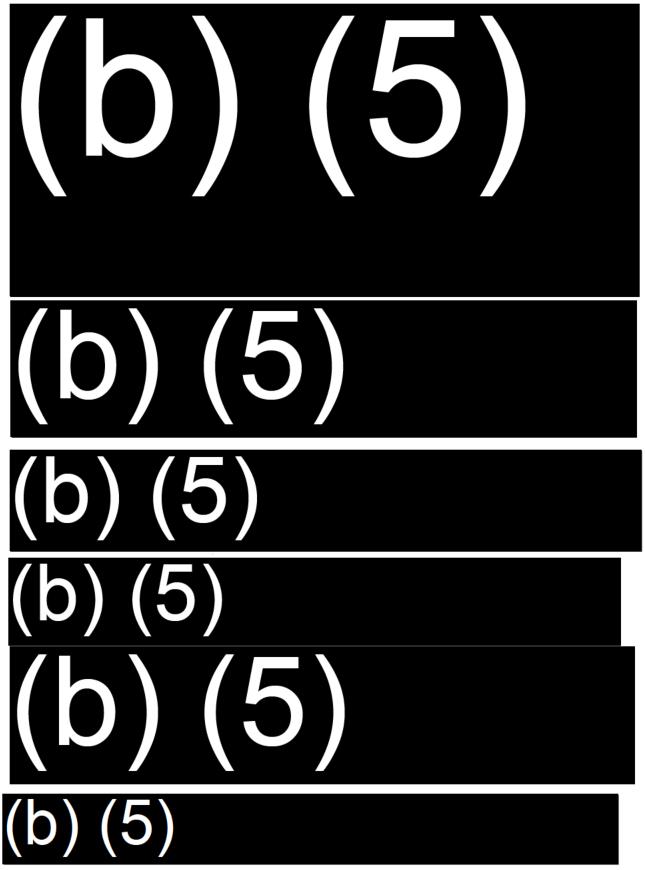
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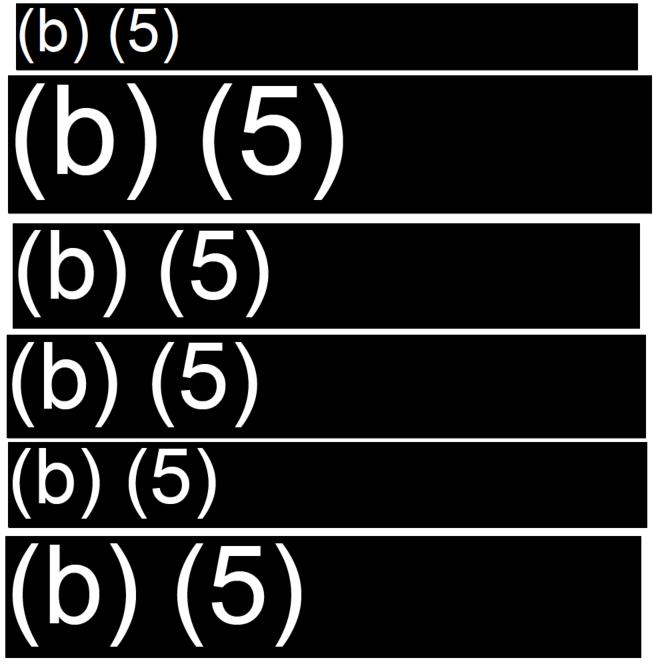


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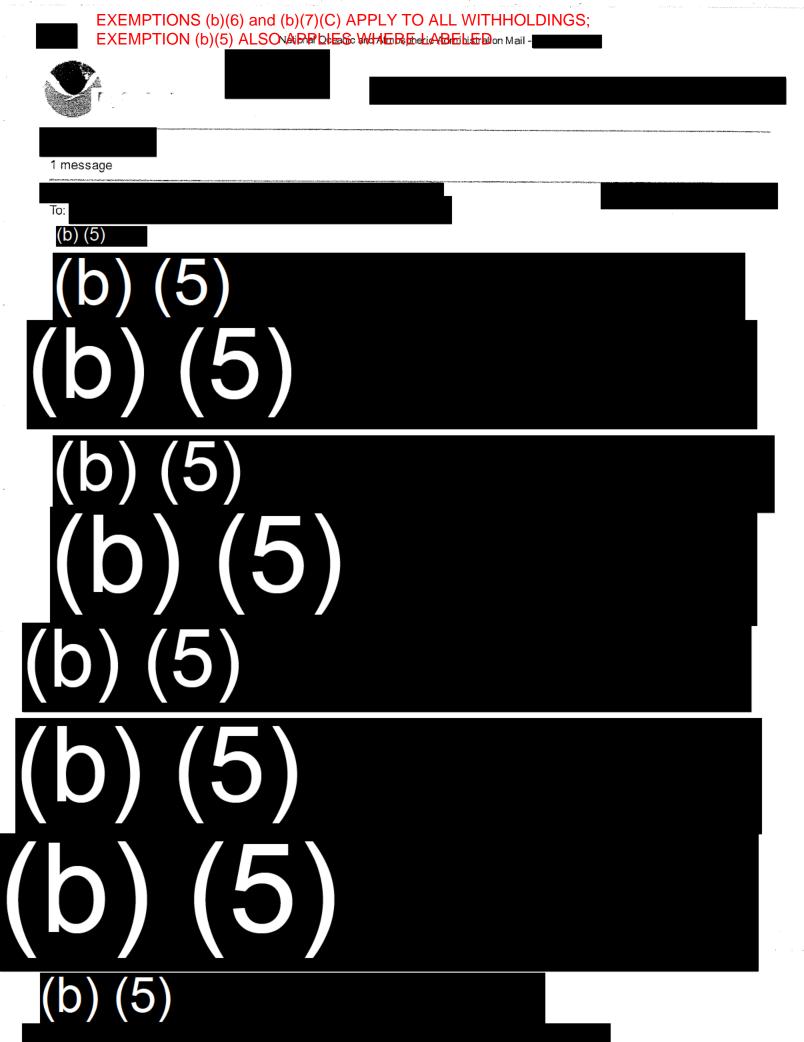


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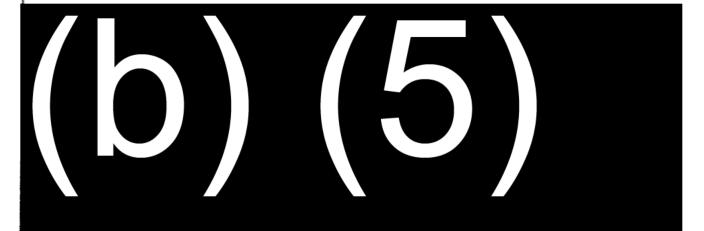
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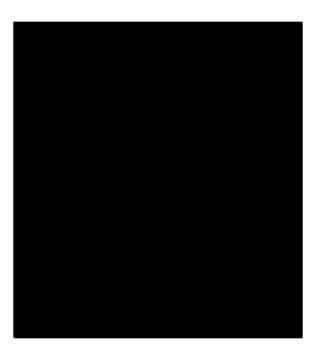


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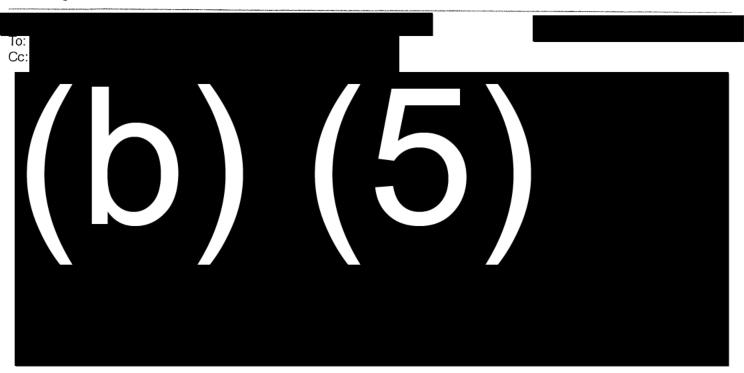


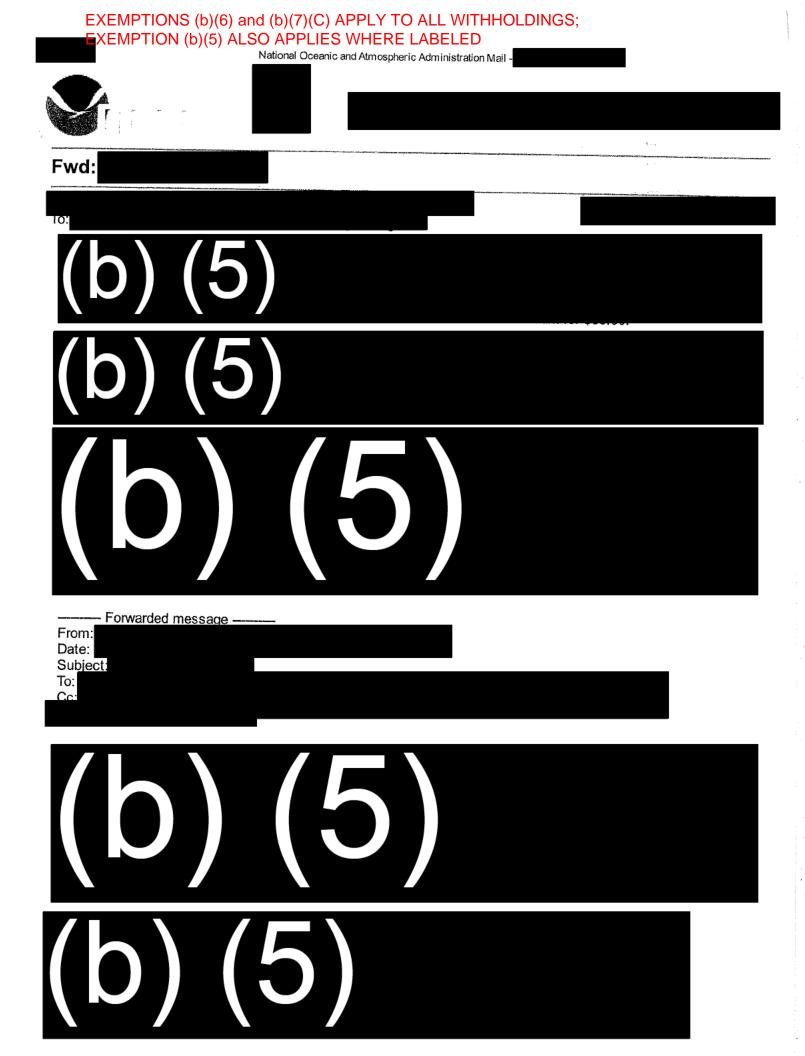


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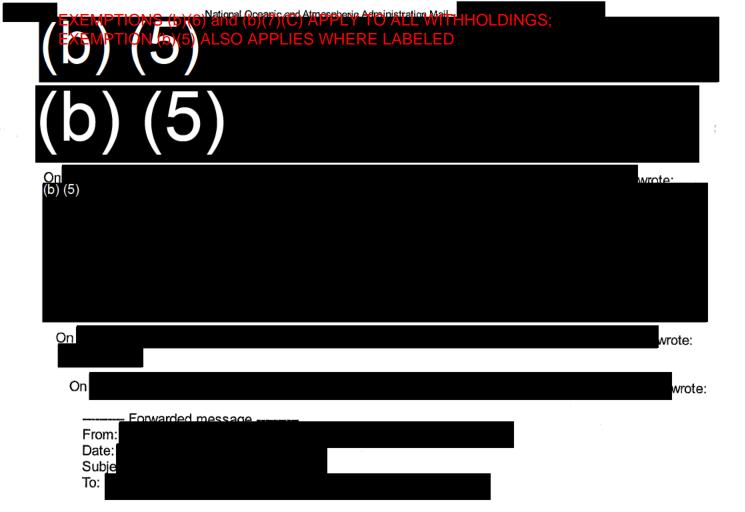
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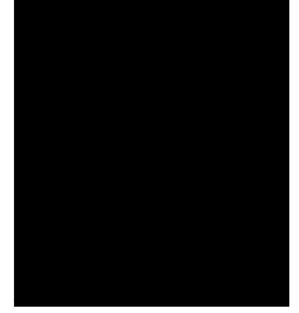




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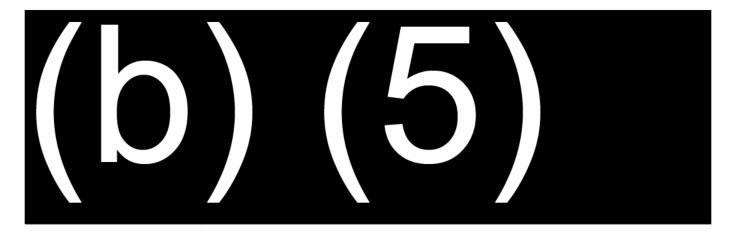


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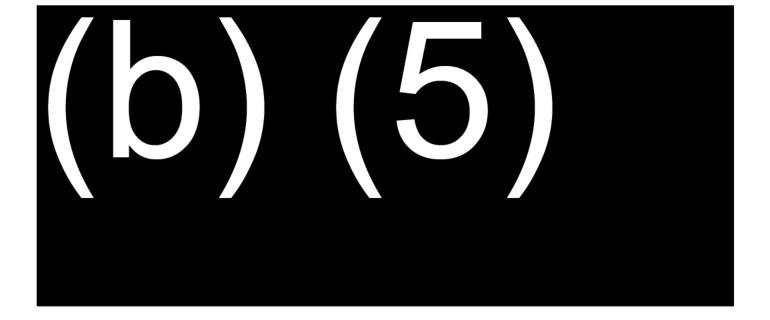
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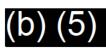
EXEMPTIONS (b)(6) and (b)(7)(C) APPLY TO ALL WITHHOLDINGS;



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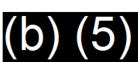


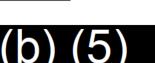




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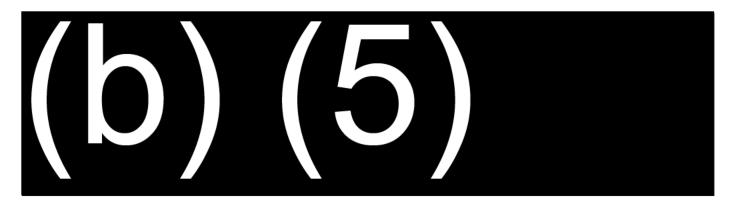


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EXEMPTIONS (b)(6) and (b)(7)(C) APPLY TO ALL WITHHOLDINGS; EXEMPTION (b)(5) ALSO APPLIES WHERE LABELED

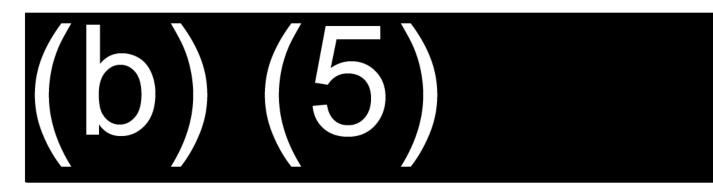


















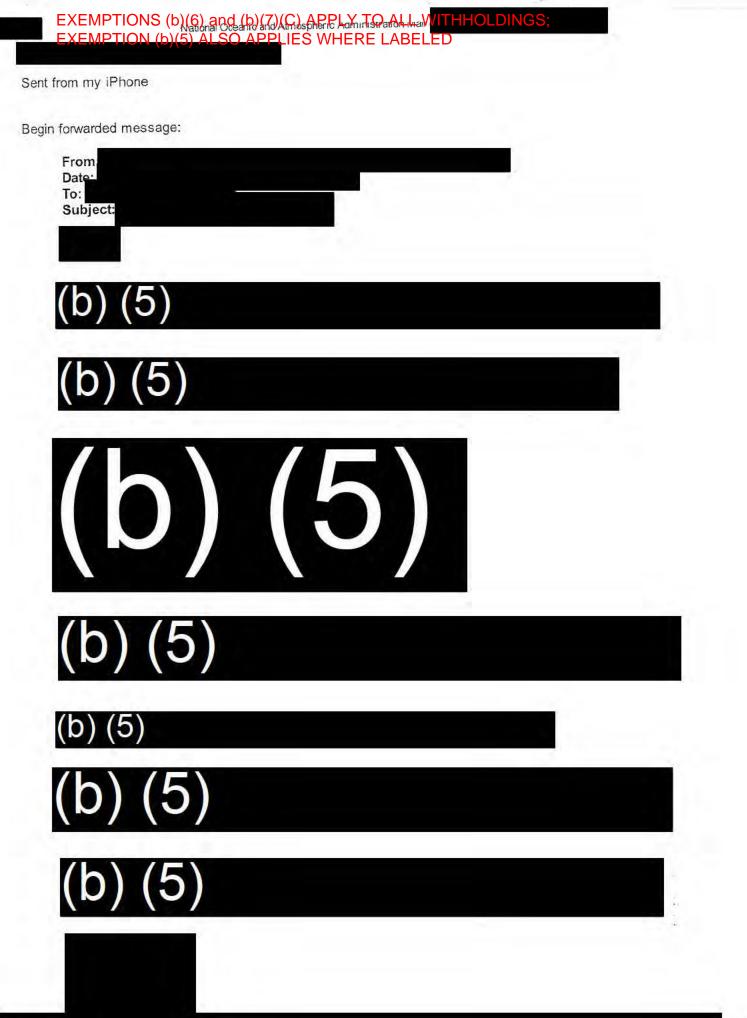




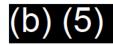
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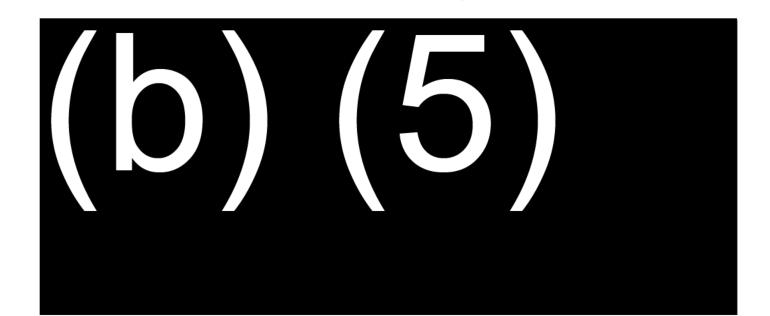
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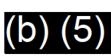
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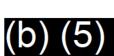


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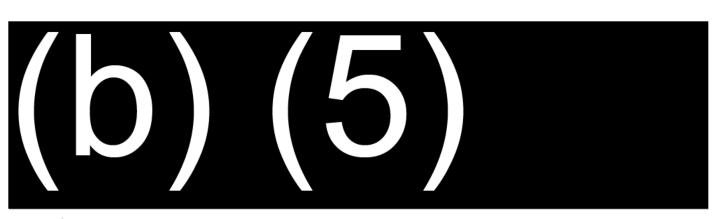




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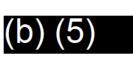


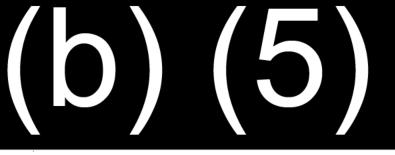
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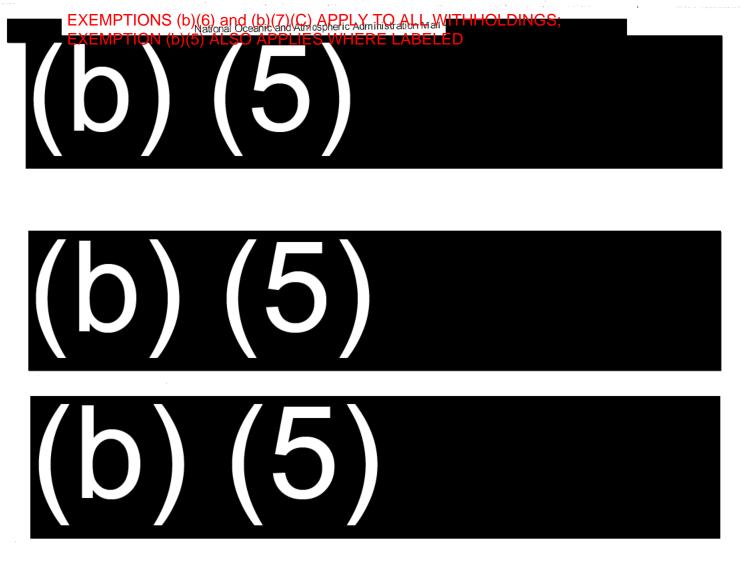
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EXEMPTIONS (b)(6) and (b)(7)(C) APPLY TO ALL WITHHOLDINGS; (b) (5) EMPTION (b)(5) ALSO APPLIES WHERE LABELED



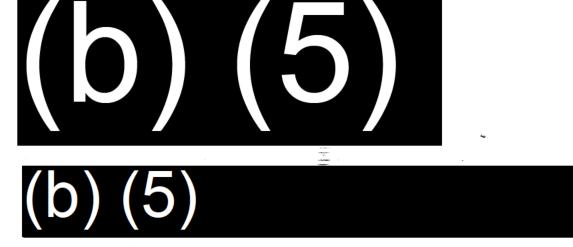






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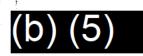
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Sent from my iPhone

Fron Date To Subject:

From	
Sent:	
To:	
Subject	







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Statement	
Interviewee:	Location:
Interviewer(s):	Date:
Note taker:	Start Time:
Pre-scheduled or Walk-in:	End Time:



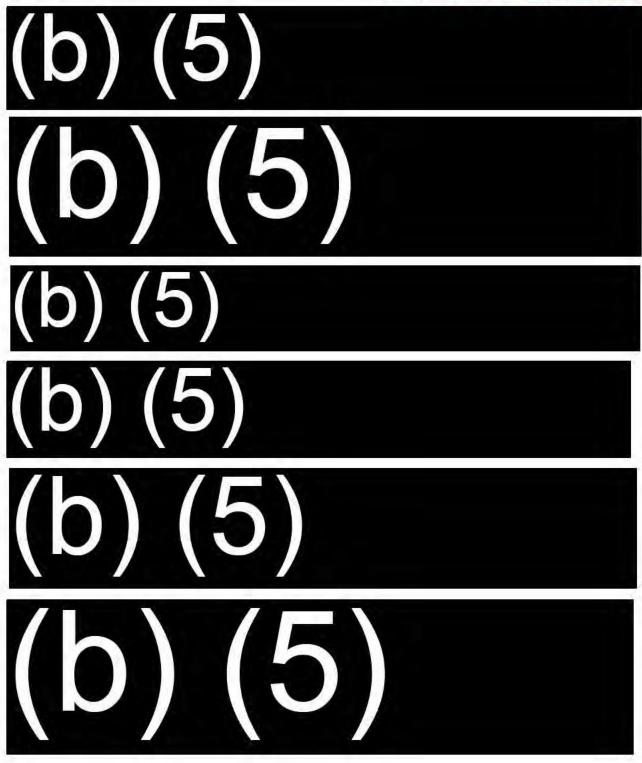






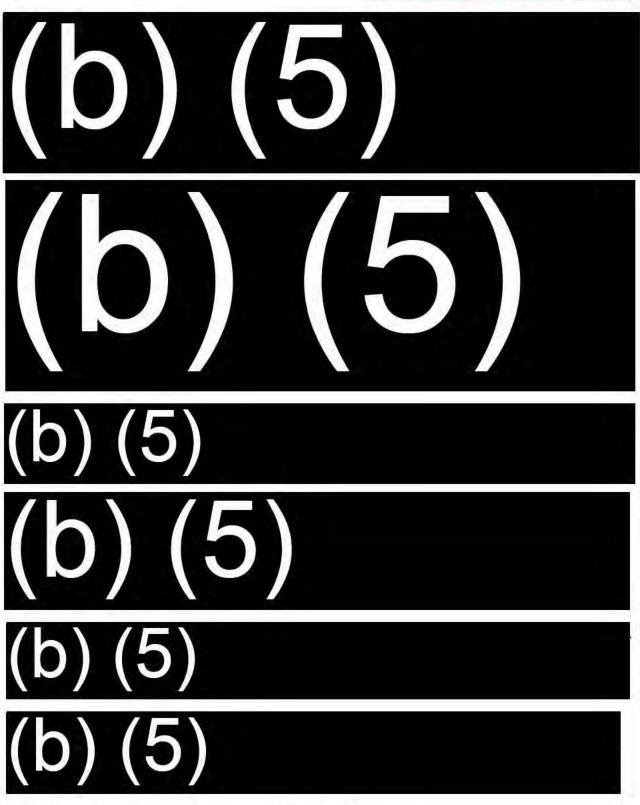
Page 1 of 8

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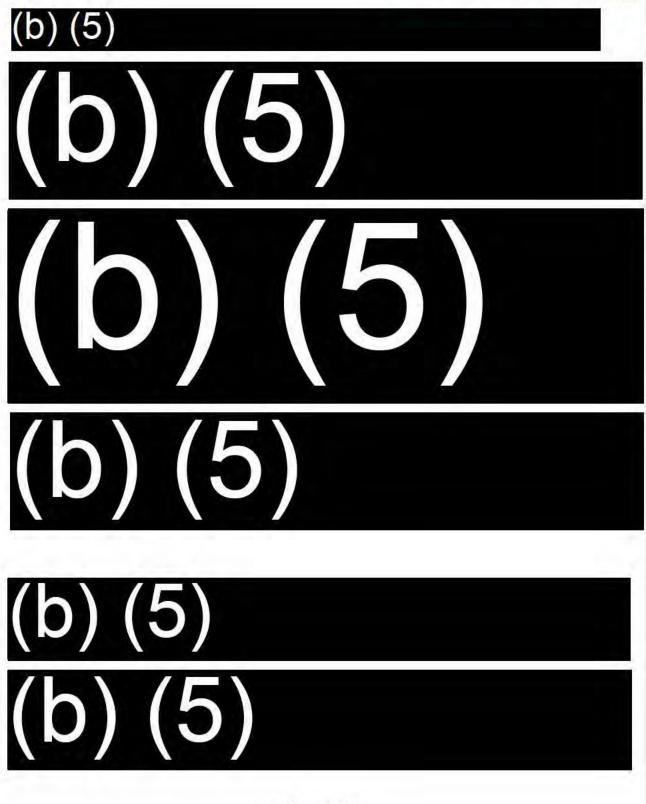
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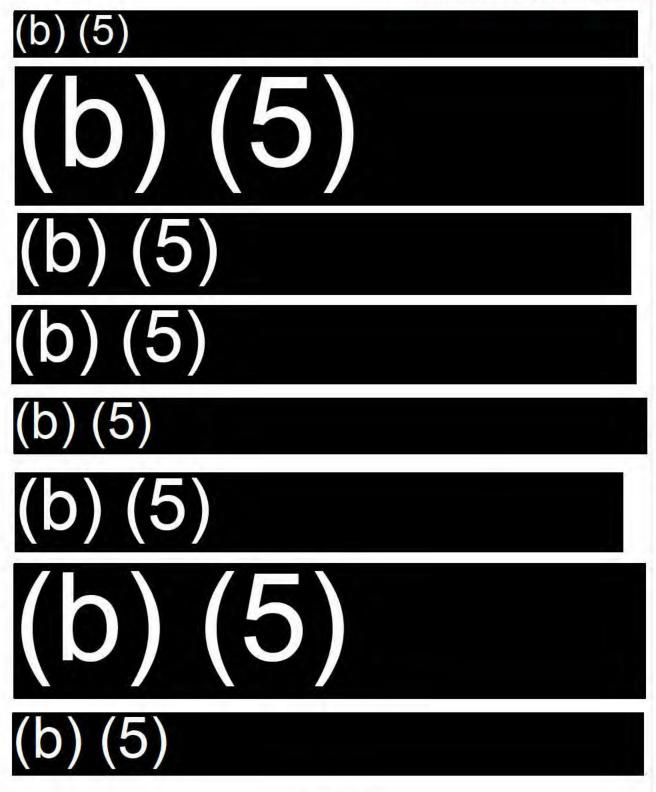
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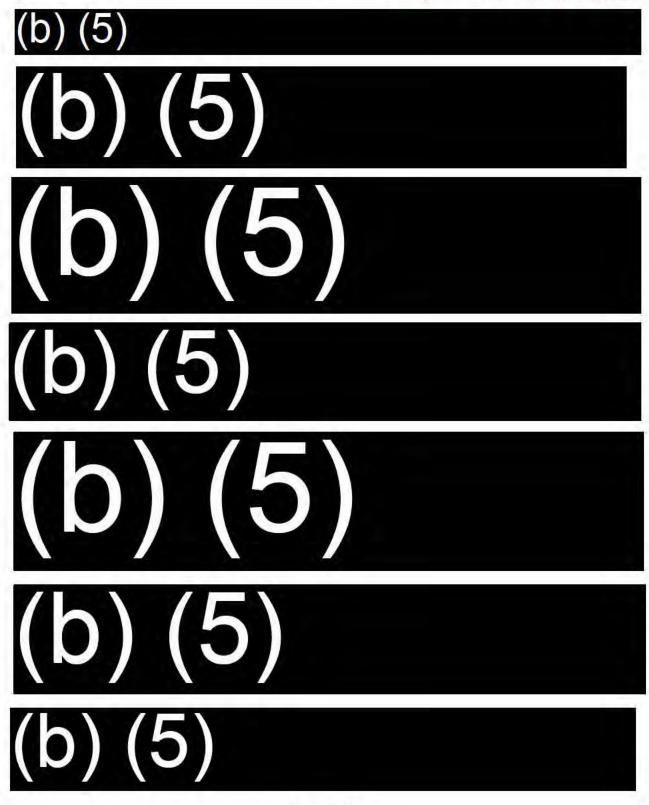
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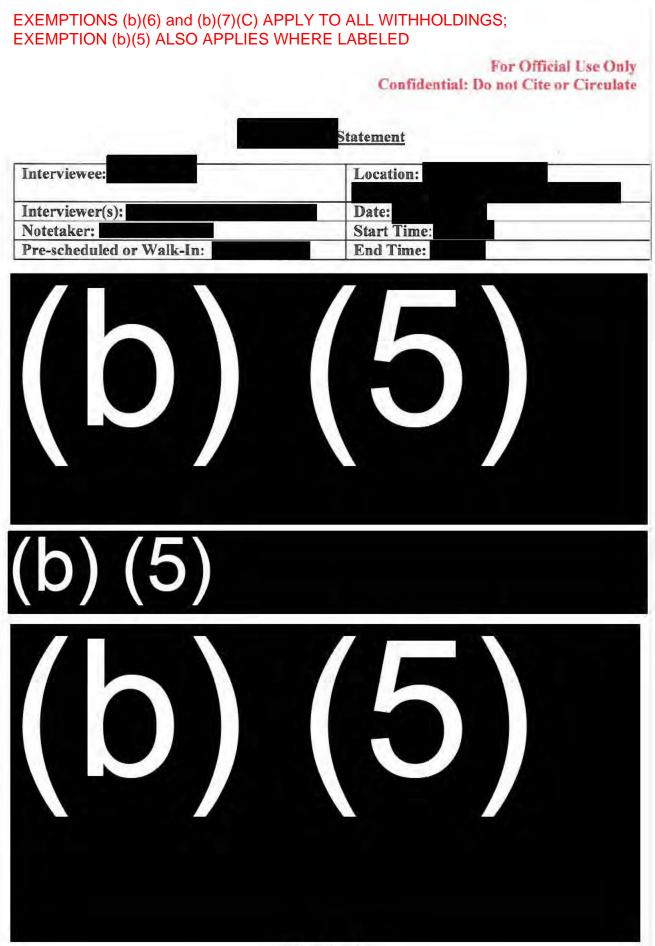


Signature of Concurrence

I agree that the statement above accurately reflects the date and conversation that I held with the aforementioned interviewers.

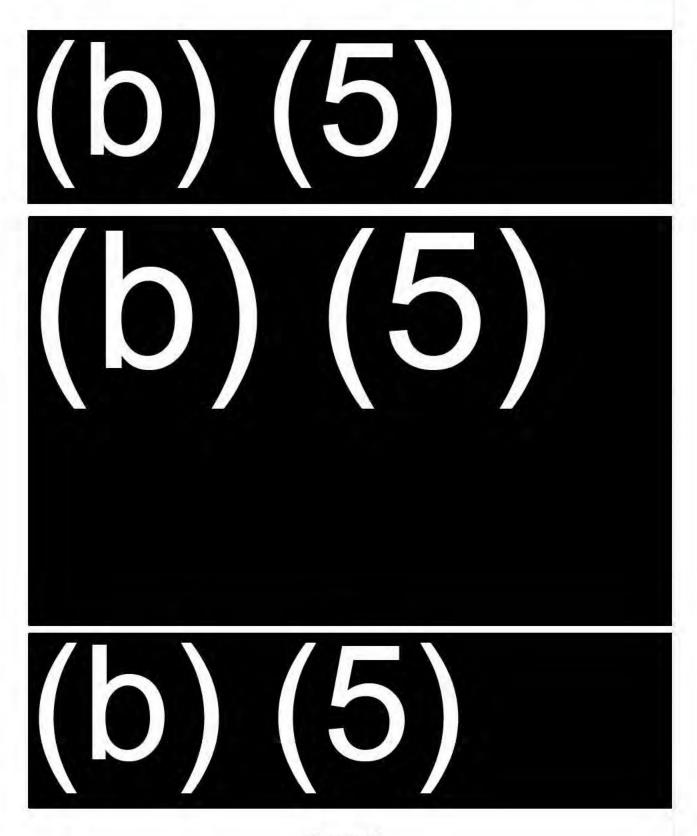
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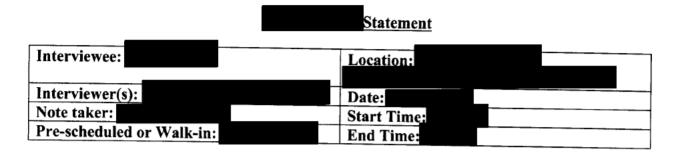


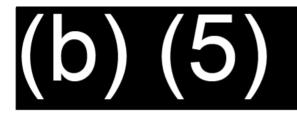
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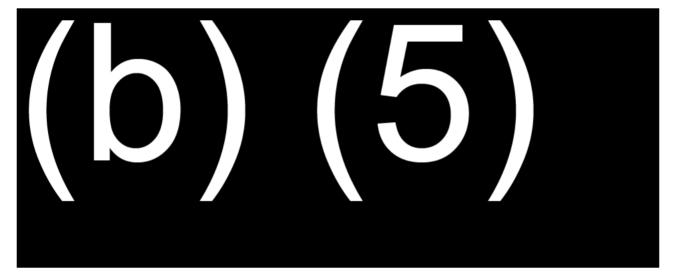
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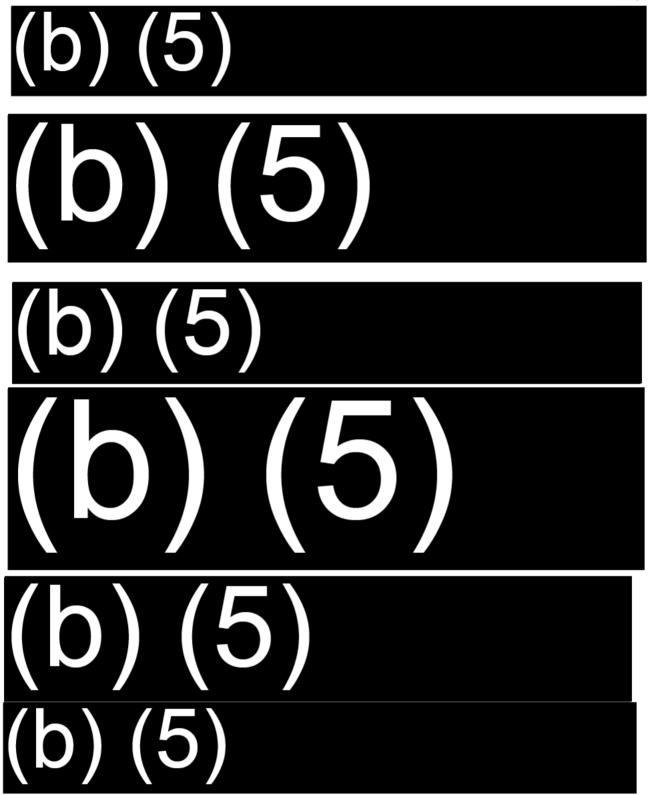






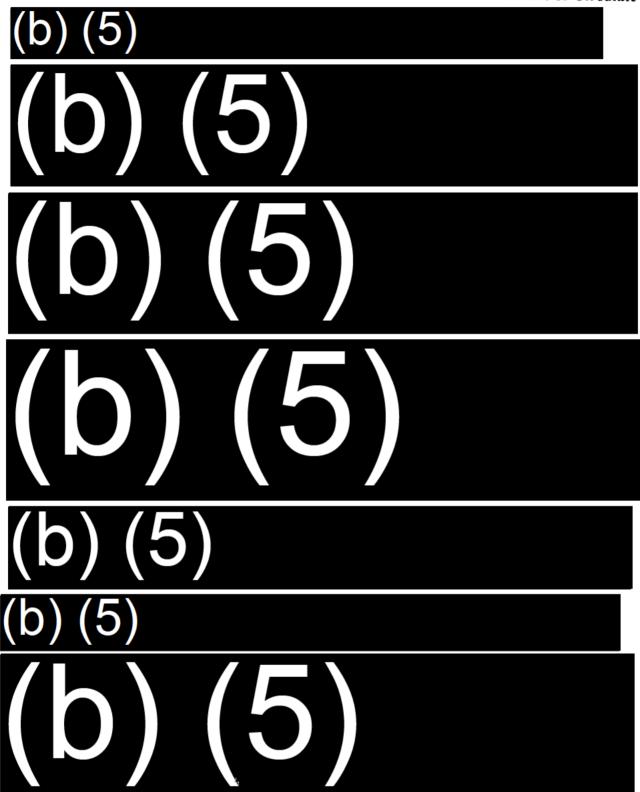
Page 1 of 5

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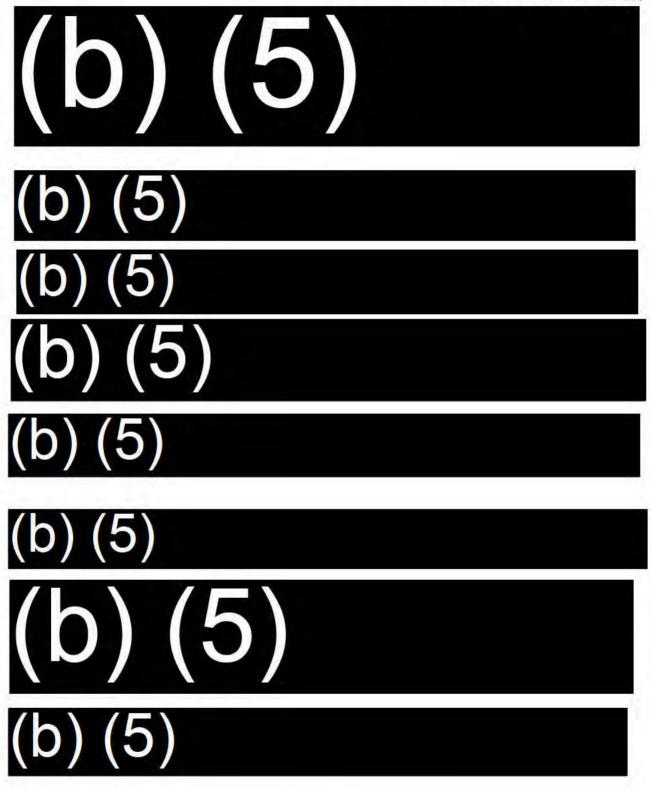
Page 2 of 5

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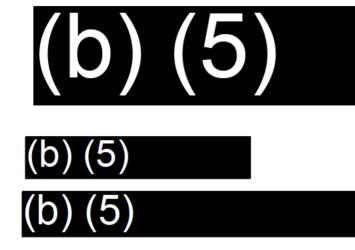
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Signature of Concurrence

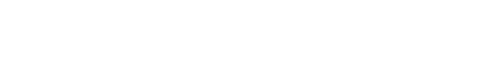
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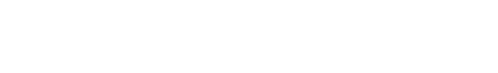












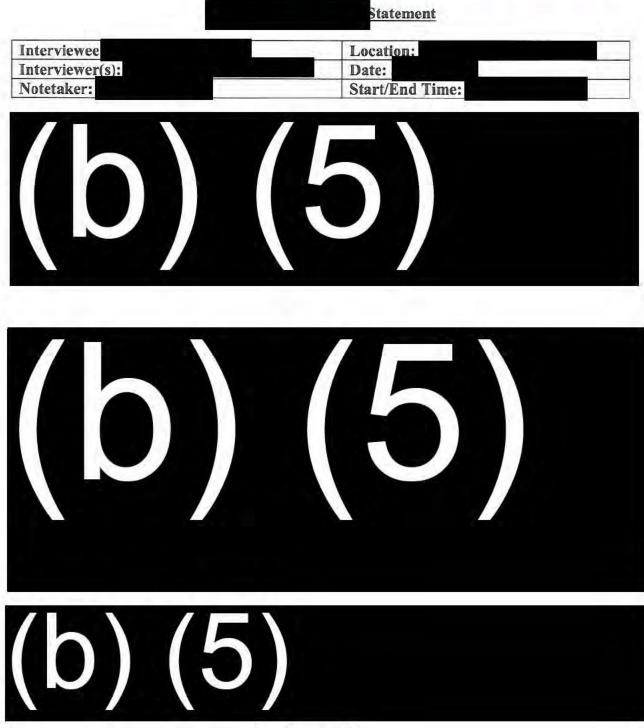






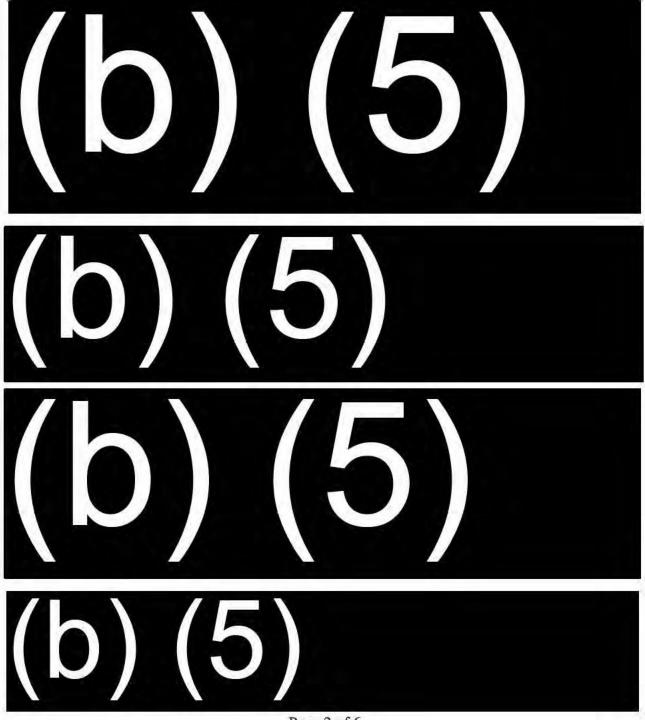


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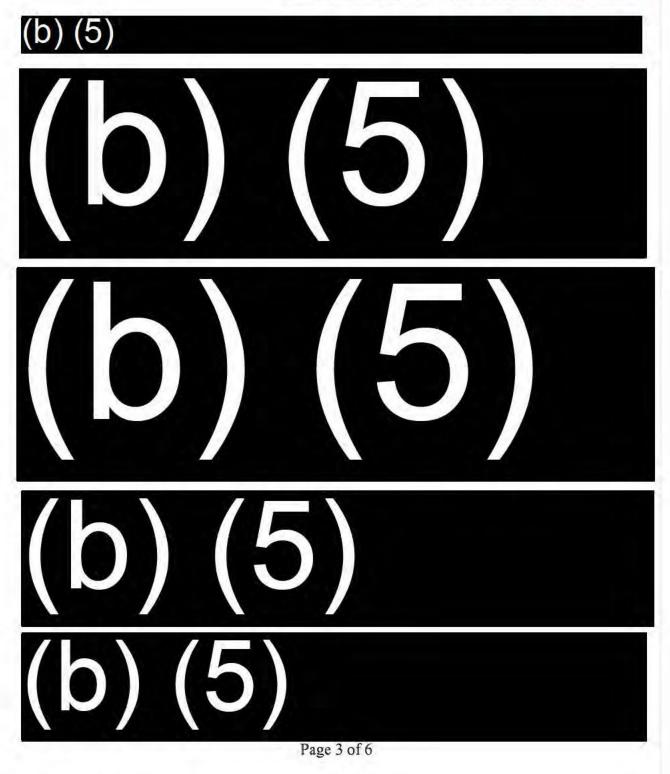
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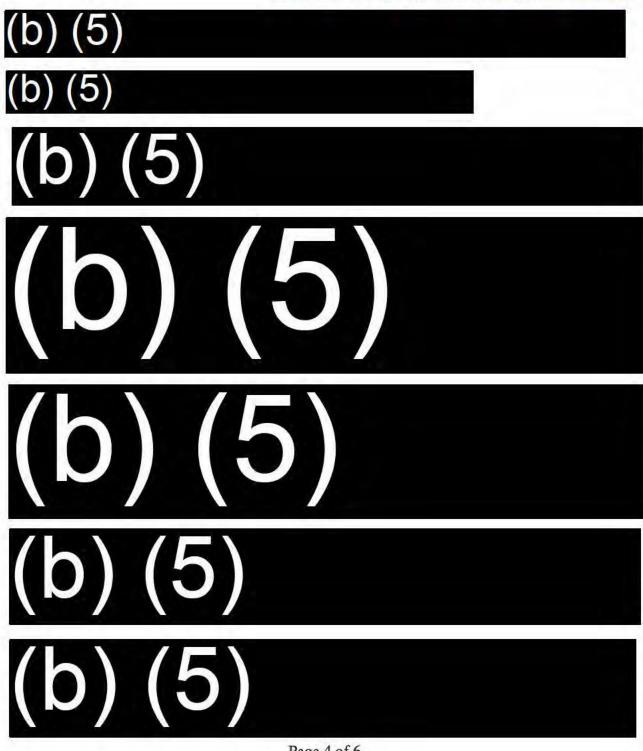


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FOR OFFICIAL USE ONLY CONFIDENTIAL: DO NOT CITE OR CIRCULATE

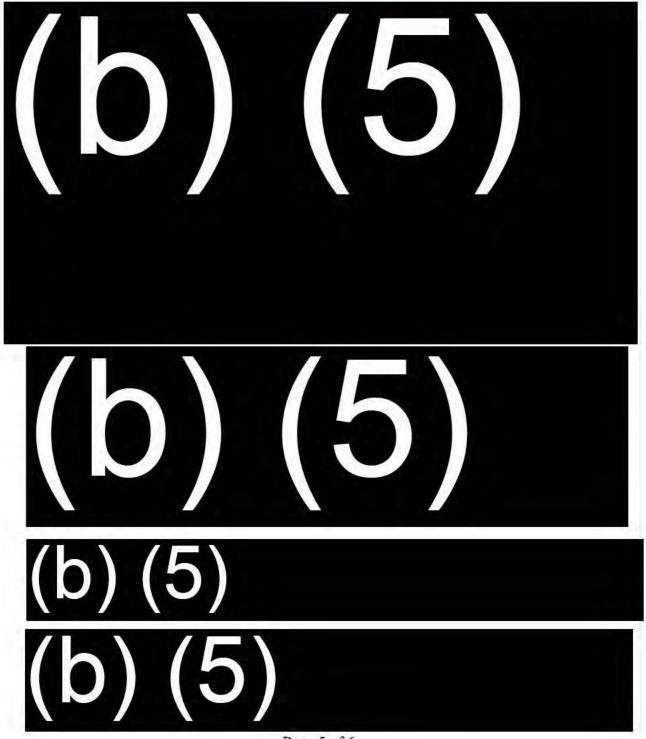


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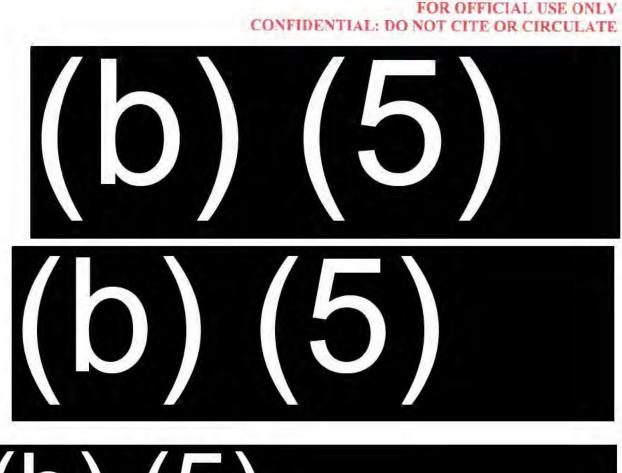


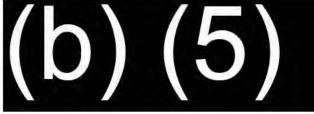
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Signature of Concurrence

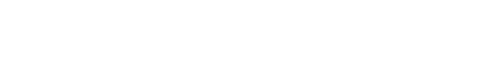
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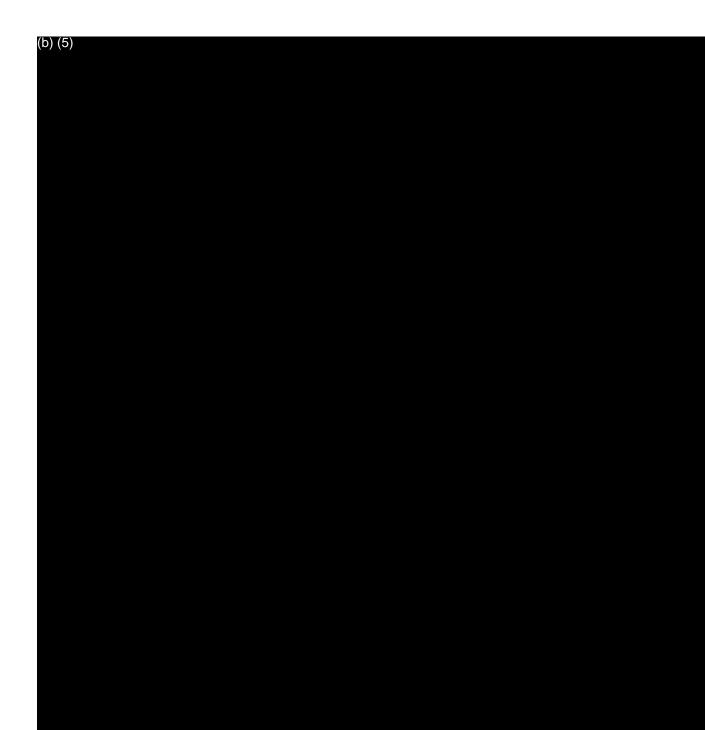


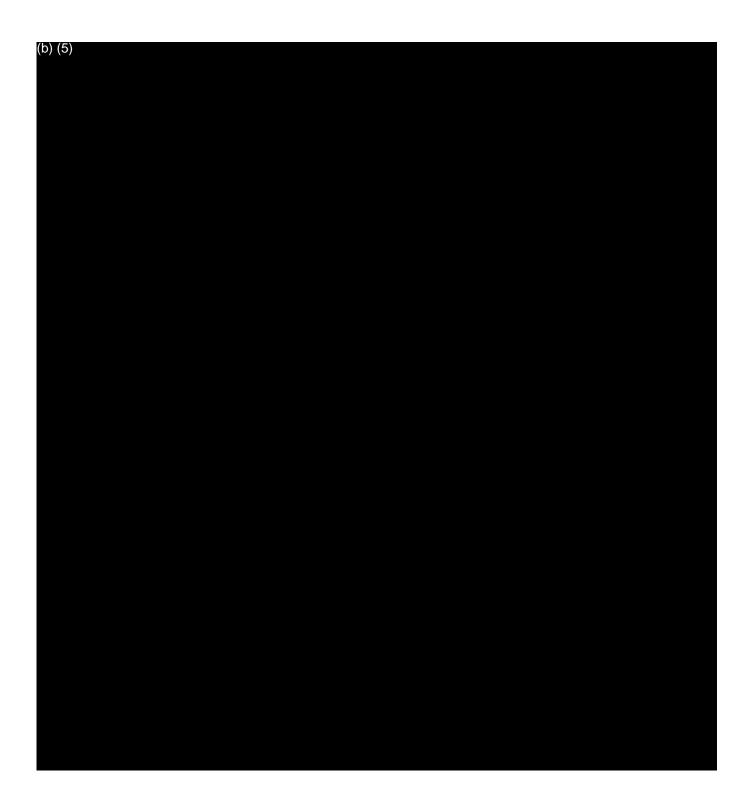


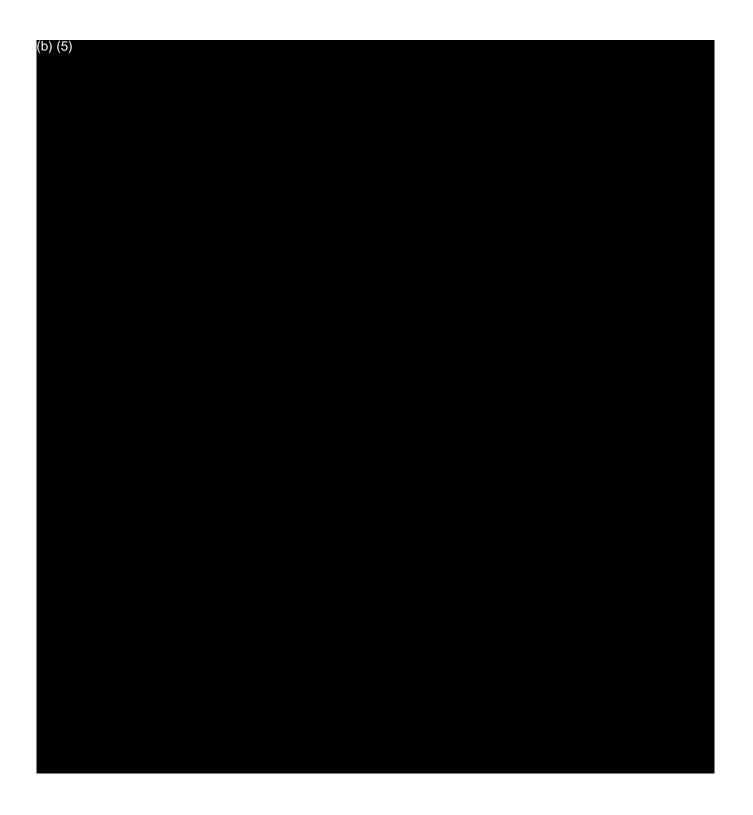


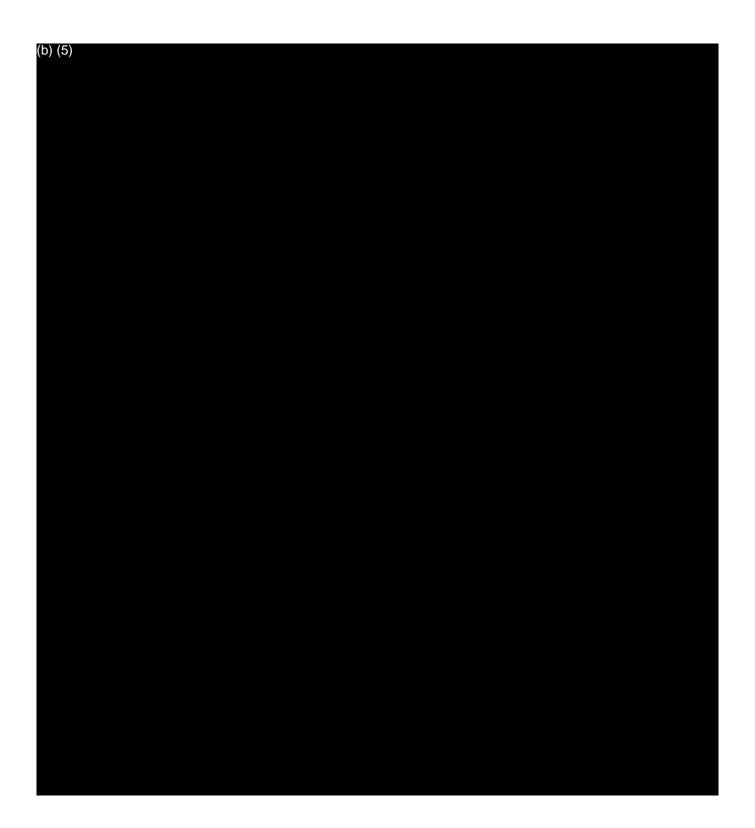
Statement

Interviewee:	Location:
Interviewer(s):	Date:
Notetaker:	Start/End Time:
(5)	











<u>Signature of Concurrence</u> I agree that the statement above accurately reflects the date and conversation that I held with the aforementioned interviewers.

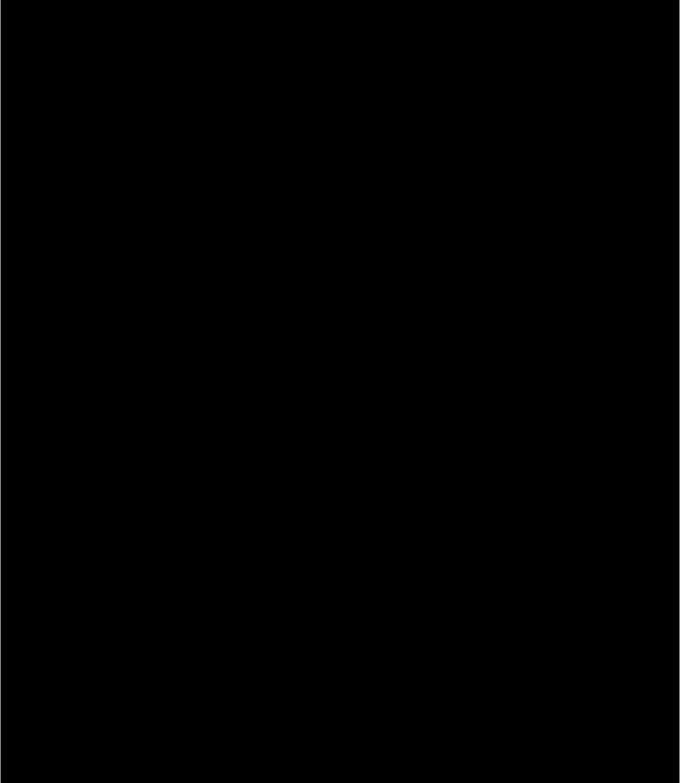


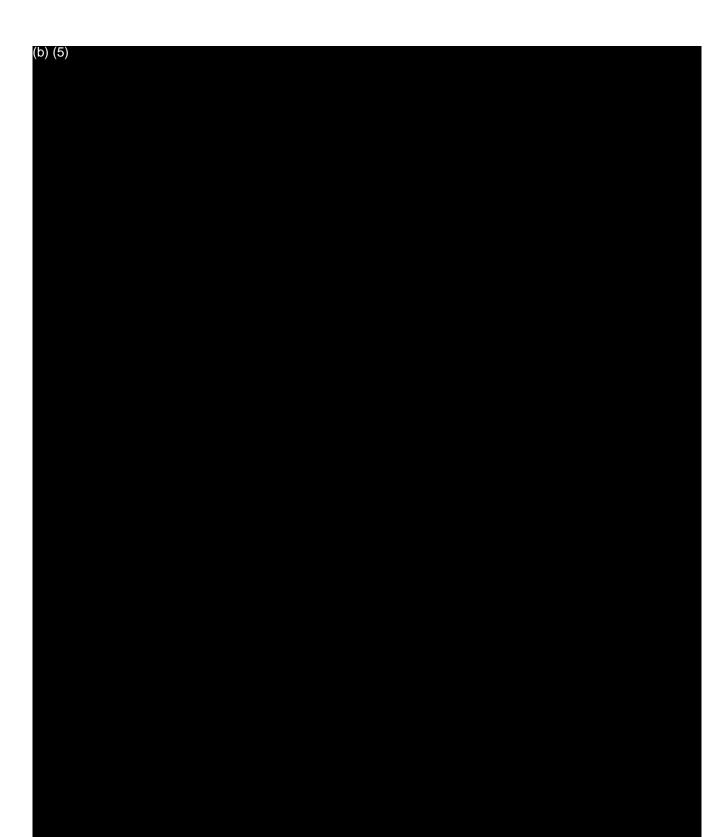
Interviewee: Date: Date: Start Time: Pre-scheduled or Walk-in: End Time:)		Statement	
Note taker: Start Time: Pre-scheduled or Walk-in: End Time:	Interviewee:	Location:	
Pre-scheduled or Walk-in: End Time:			
		Start Time:	
	Pre-scheduled or Walk-in:	End Time:	

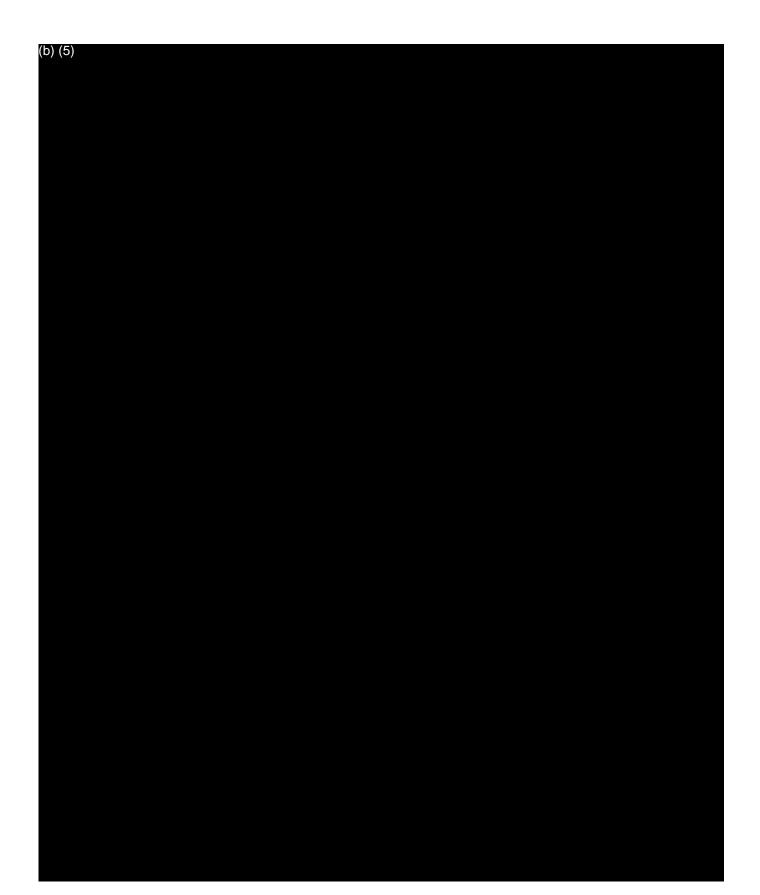












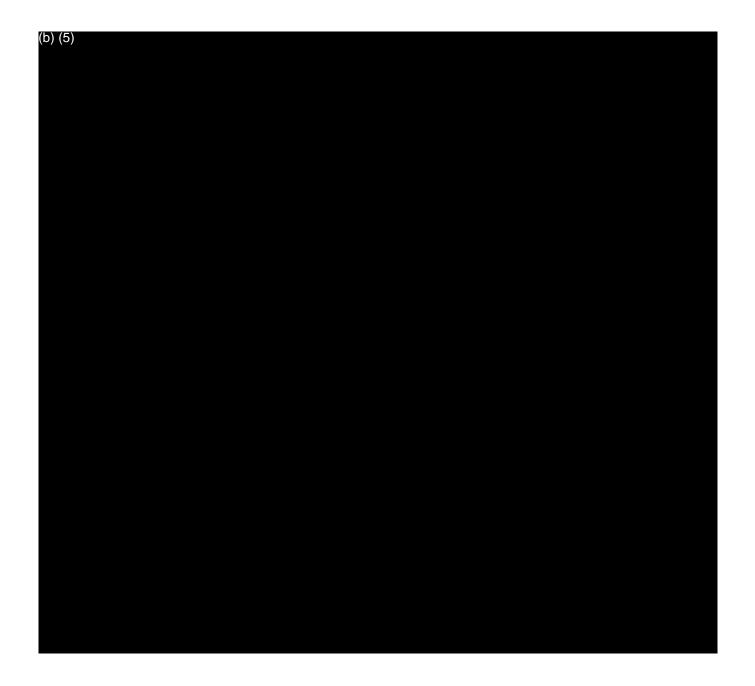


(b) (5)



Signature of Concurrence I agree that the statement above accurately reflects the date and conversation that I held with the aforementioned interviewers.



















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	Interview
Interviewee:	Location
Interviewer(s):	Date:
Notetaker	Start/End Time:



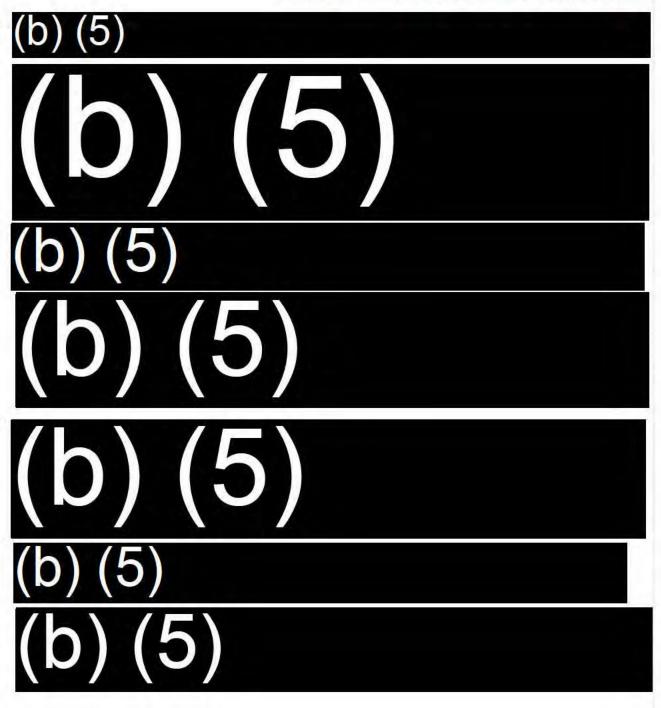


(b)(5)

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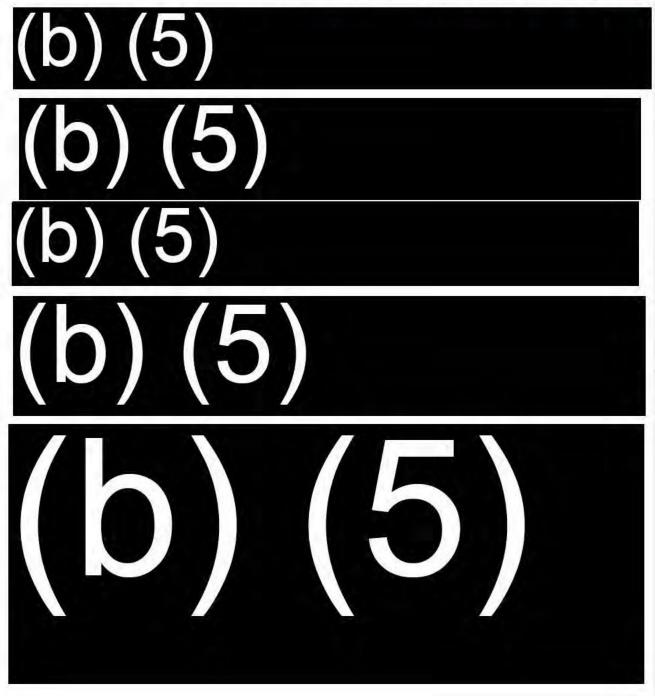
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CONFIDENTIAL: DO NOT CITE OR CIRCULATE

FOR OFFICIAL USE ONLY

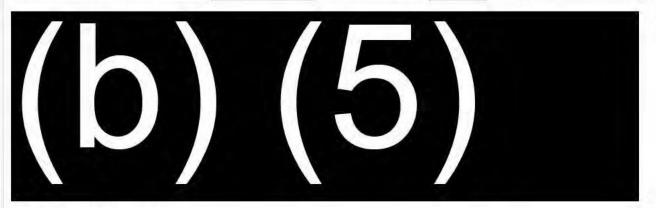
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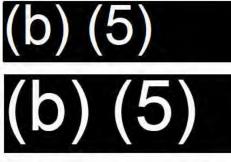
FOR OFFICIAL USE ONLY CONFIDENTIAL: DO NOT CITE OR CIRCULATE

Signature of Concurrence I agree that the statement above accurately reflects the date and conversation that I held with the aforementioned interviewers.

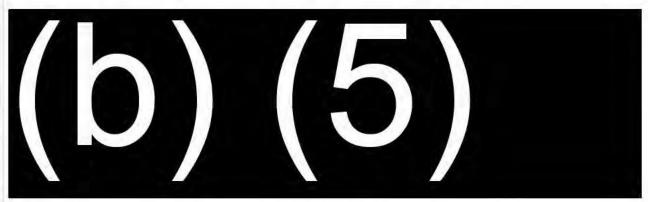
For Official Use Only Confidential: Do not Cite or Circulate

	Statement	
Interviewee:	Location:	
Interviewer(s):	Date:	
Notetaker:	Start Time:	
Pre-scheduled or Walk-In:	End Time:	

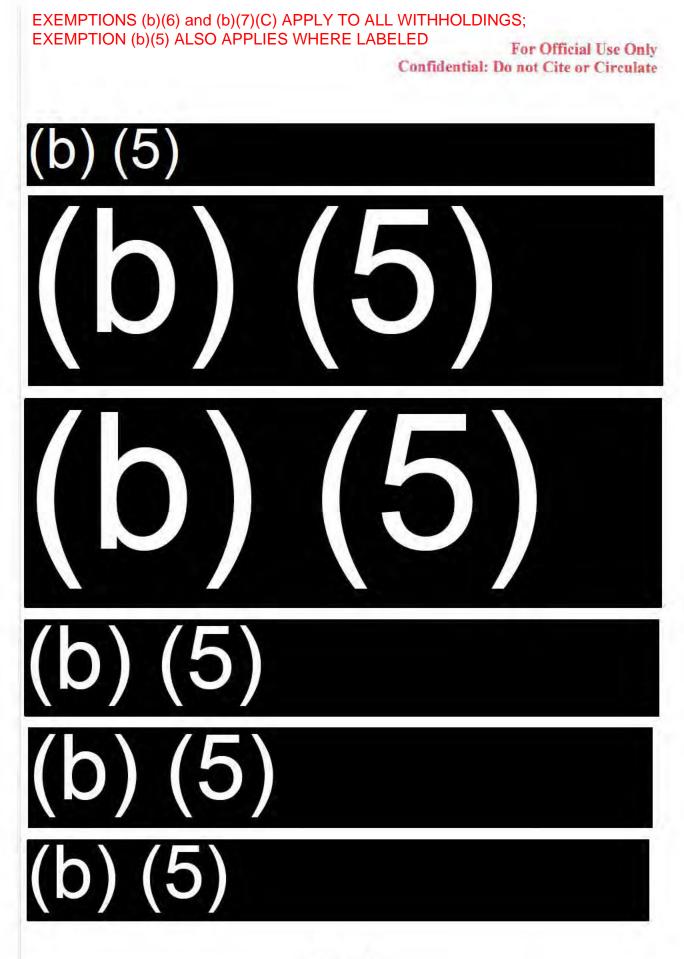


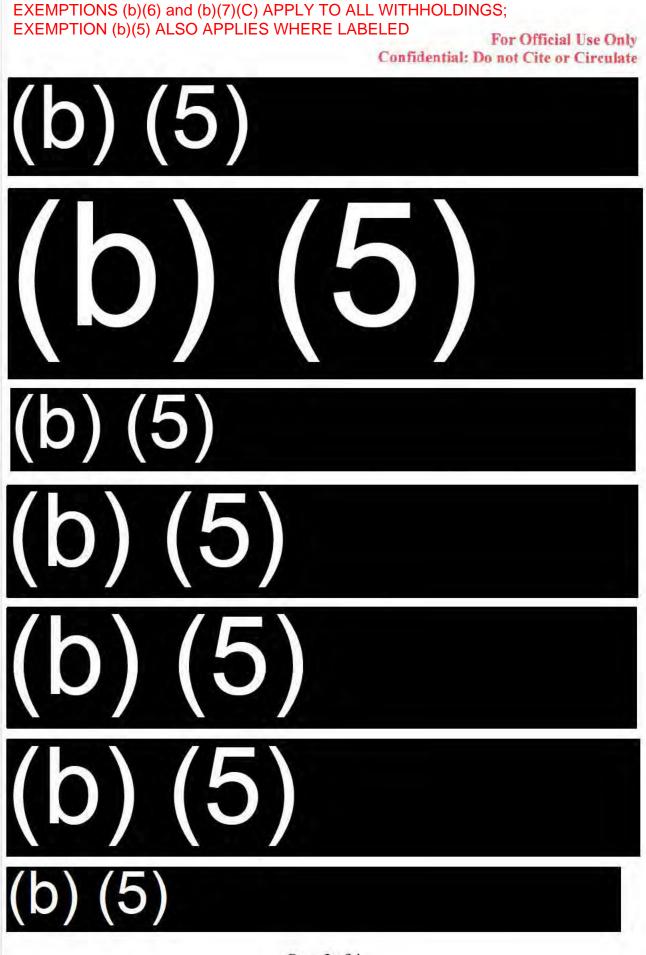






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(b) (5)

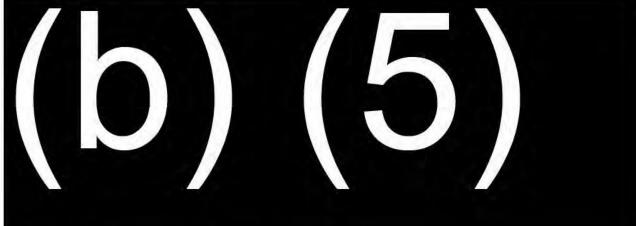
Signature of Concurrence I agree that the statement above accurately reflects the date and conversation that I held with the aforementioned interviewers.

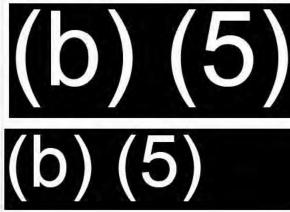


FOR OFFICIAL USE ONLY CONFIDENTIAL: DO NOT CITE OR CIRCULATE

	Statement
Interviewee:	Location:
Interviewer(s):	Date:
Notetaker:	Start/End Time:



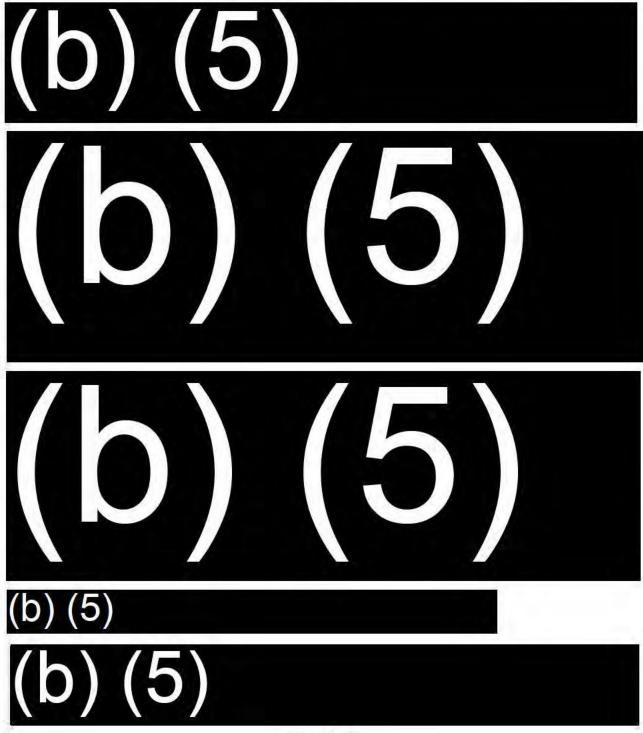




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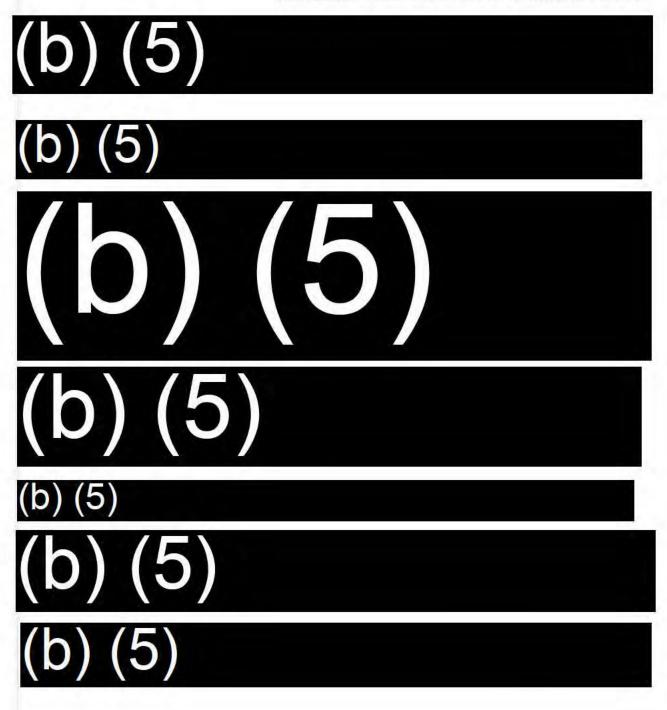


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FOR OFFICIAL USE ONLY CONFIDENTIAL: DO NOT CITE OR CIRCULATE



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FOR OFFICIAL USE ONLY CONFIDENTIAL: DO NOT CITE OR CIRCULATE

Signature of Concurrence

I agree that the statement above accurately reflects the date and conversation that I held with the aforementioned interviewers.

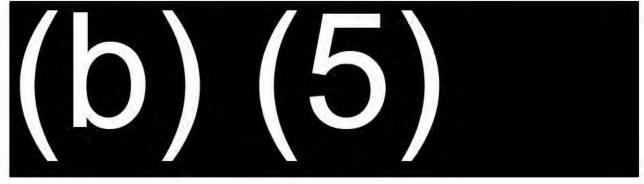
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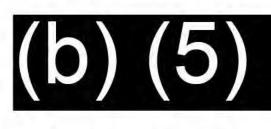


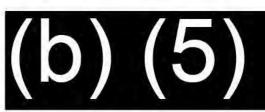
Interviewee:	Location:
Interviewer(s):	Date:
Note taker:	Start Time:
Pre-scheduled or Walk-in:	End Time:



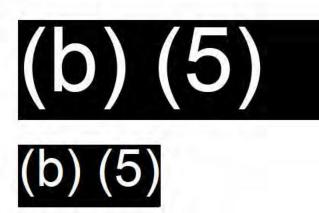
(b) (5)







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(b) (5)

Signature of Concurrence

I agree that the statement above accurately reflects the date and conversation that I held with the aforementioned interviewers.





> DRAFT CONFIDENTIAL – DO NOT CITE OR CIRCULATE

ADMINISTRATIVE INQUIRY OF FLORIDA KEYS NATIONAL MARINE SANCTUARY OIG COMPLAINT REFERRAL NO.

STATEMENT COVER PAGE

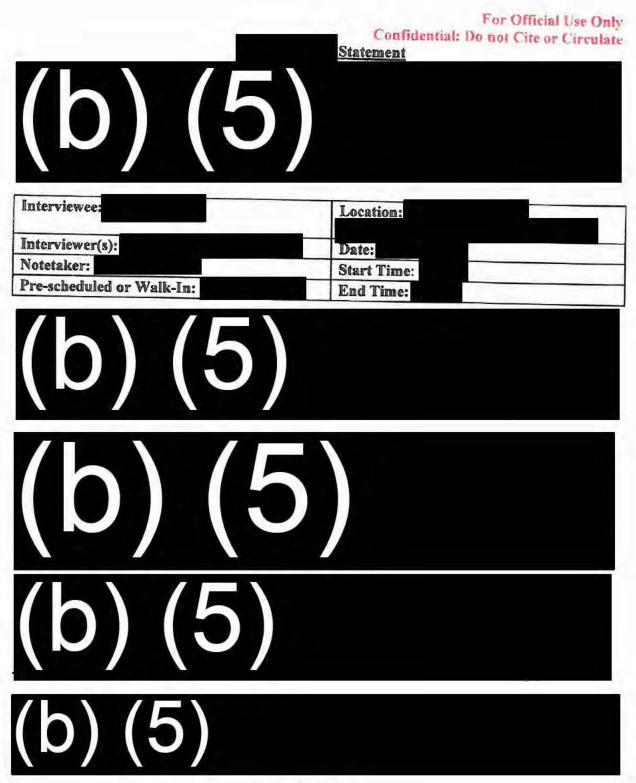
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UNSIGNED

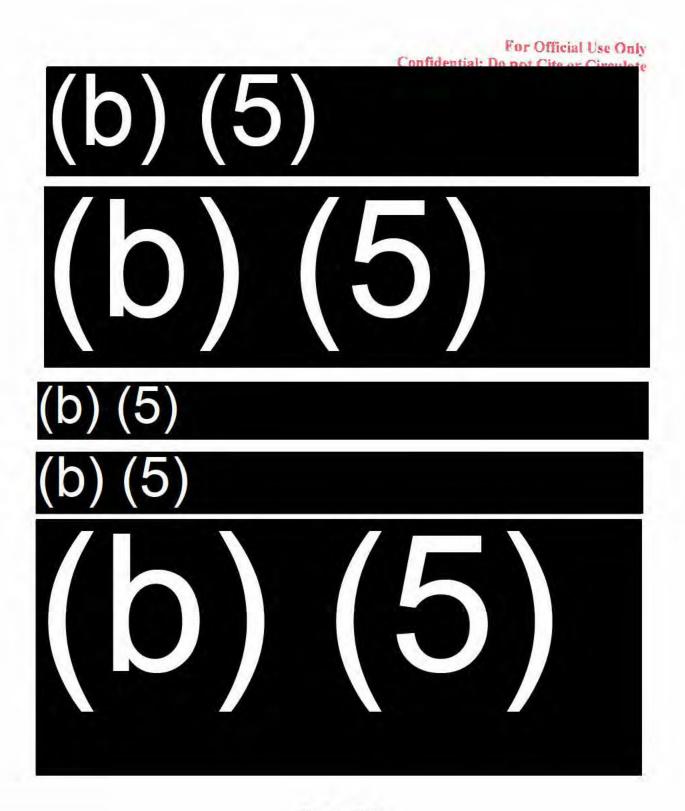
The interviewee of the following statement failed to return his/her statement to the Administrative Investigative Team (AIT) signed. Several attempts were made to supply the interviewee with an opportunity to review, edit and submit his/her statement. Each interviewee was sent their draft statement and given the opportunity to review and edit. Interviewees were also given the opportunity to submit an addendum to the statement if they recalled any additional information after the interview, or if they wanted to submit additional supporting documentation.

X _ CONTAINS SUBSTANTIVE CONTENT CHANGES

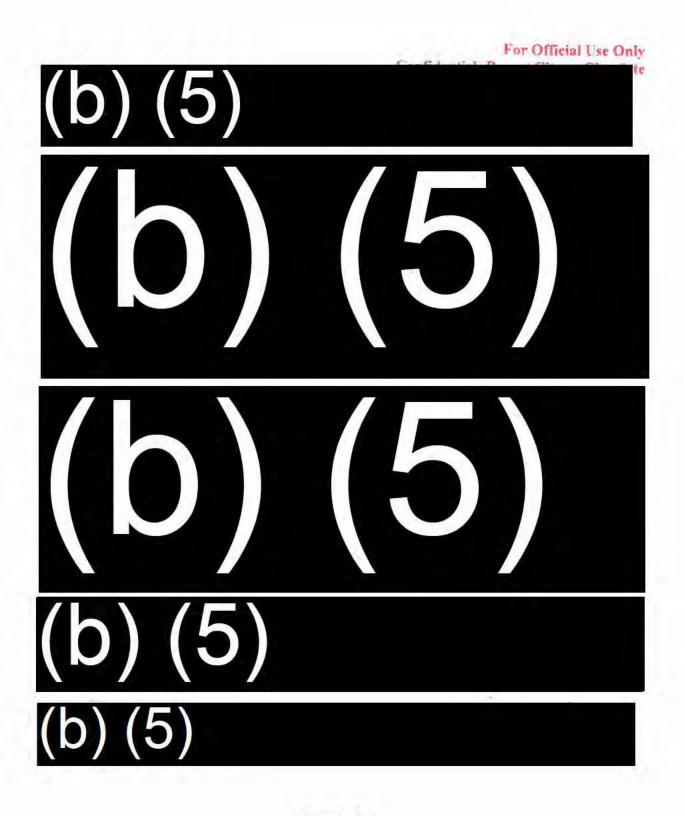
The interviewee of the following statement altered the substantive content of the interview as captured in the original draft statement. This determination was made by consensus of the entire AIT. Therefore, the interviewee's track changes version along with the original version and edited signed version are included in this report in order to accurately represent those differences. Interviewees that submitted edits such as these have been made aware that both versions are included in this final report. Where quotes from the interviewee's statement are excerpted in the Findings or Recommendations section of the AIT's report, they are drawn from the signed version of the statement.



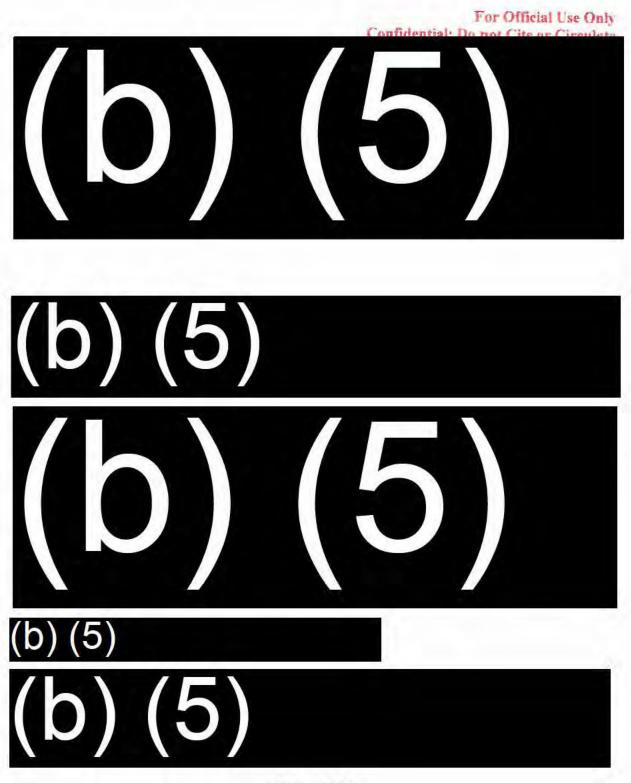
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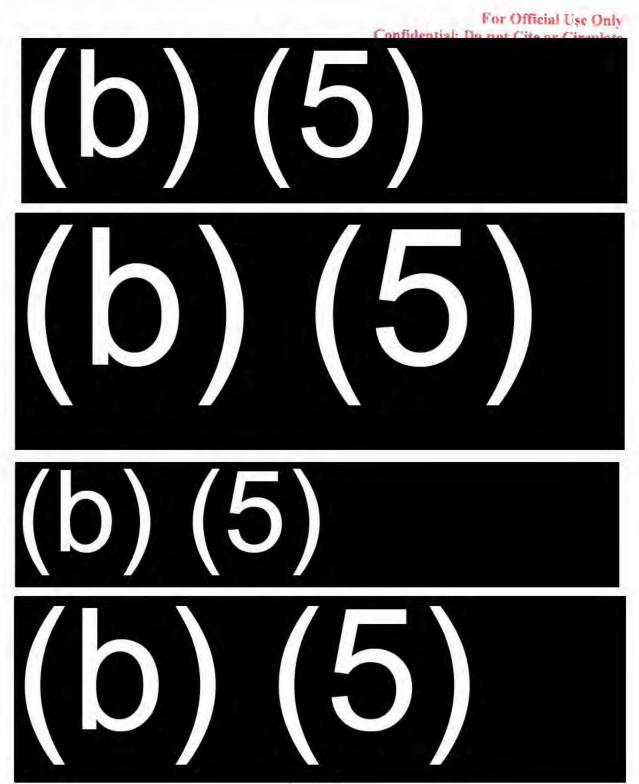
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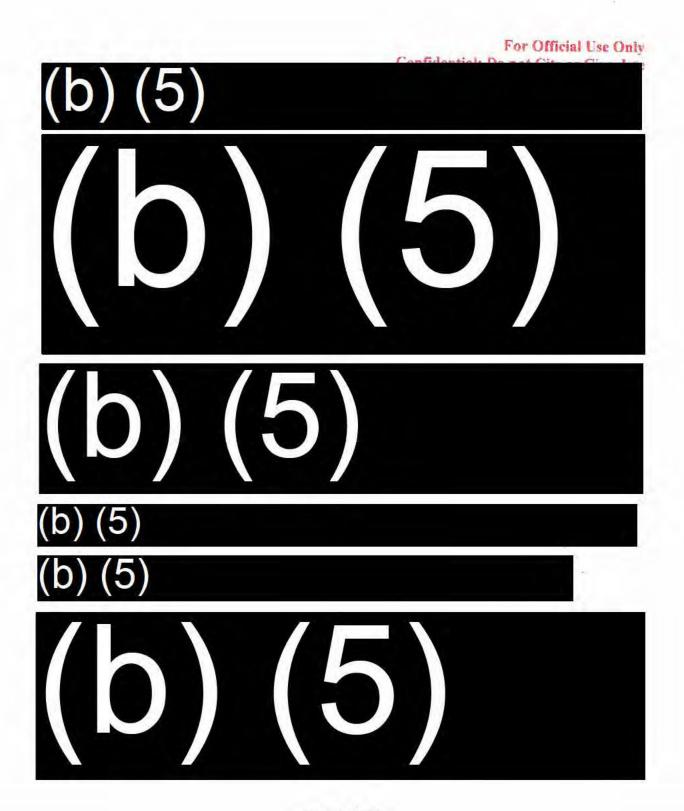
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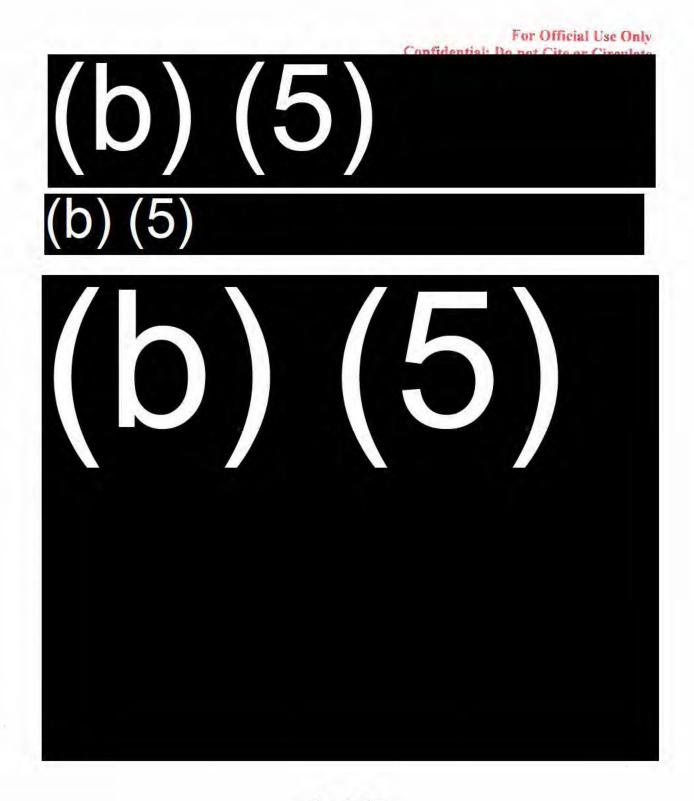
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	Statement
Interviewee:	Location:
Interviewer(s):	Date:
Notetaker:	Start Time:
Pre-scheduled or Walk-In:	End Time:
(b) (ť	5)
(b)	(5)
(b) (5)	
(b)	(5)

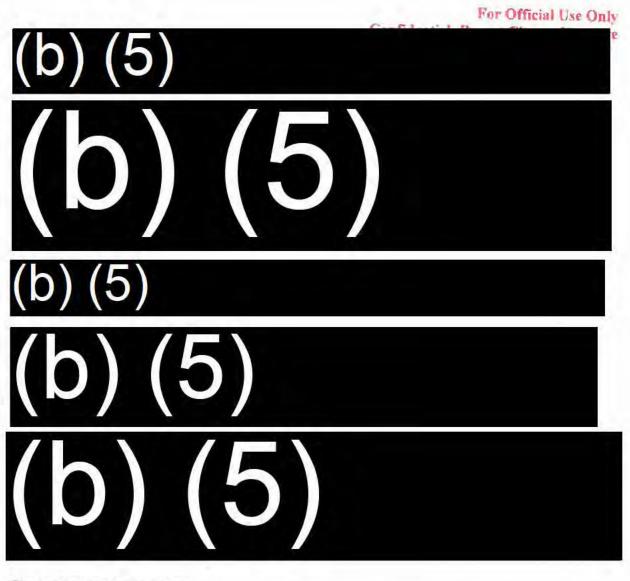
Page 7 of 12

For Official Use Only (5)(b 5) 5 (b) (5)

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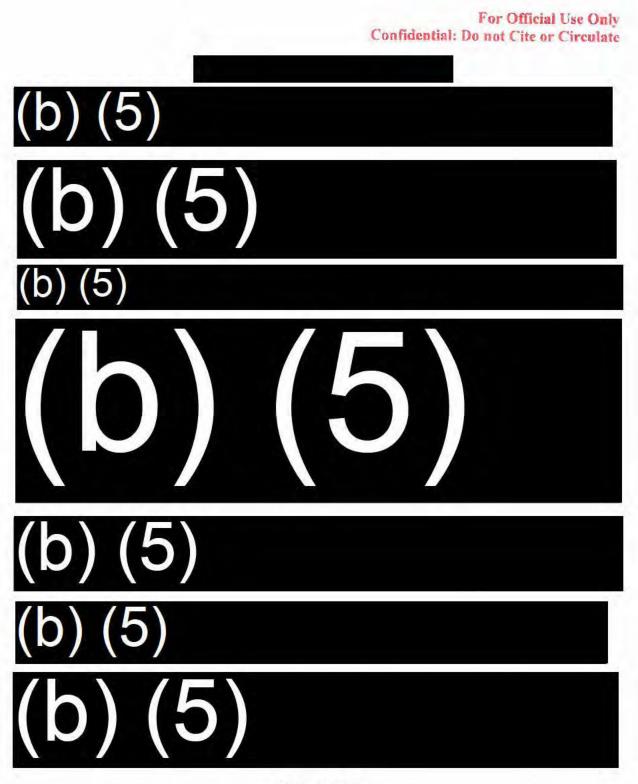


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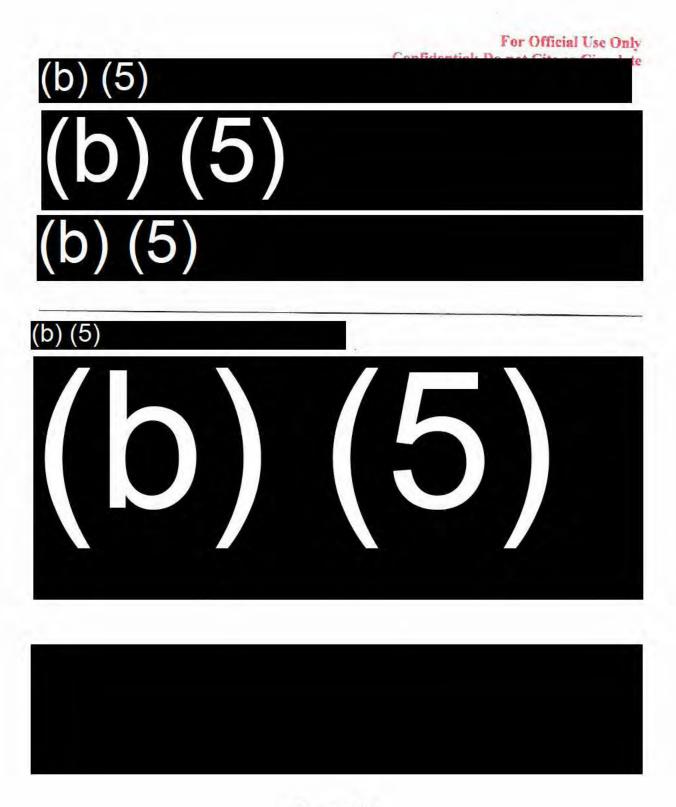


Signature of Concurrence I agree that the statement above accurately reflects the dates and some of the conversations that I held with the aforementioned interviewers.

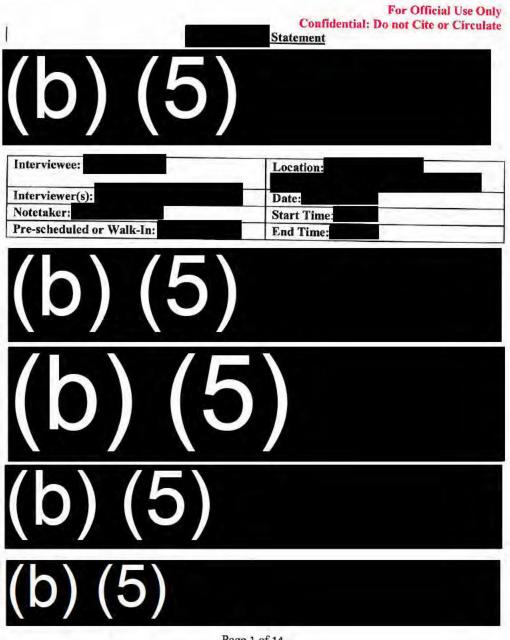
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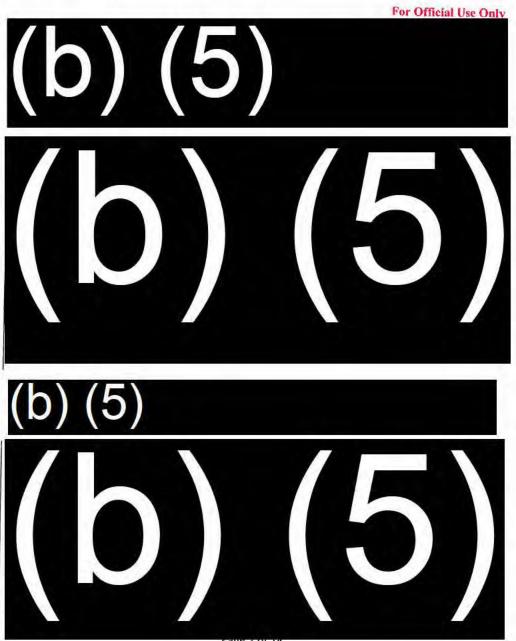
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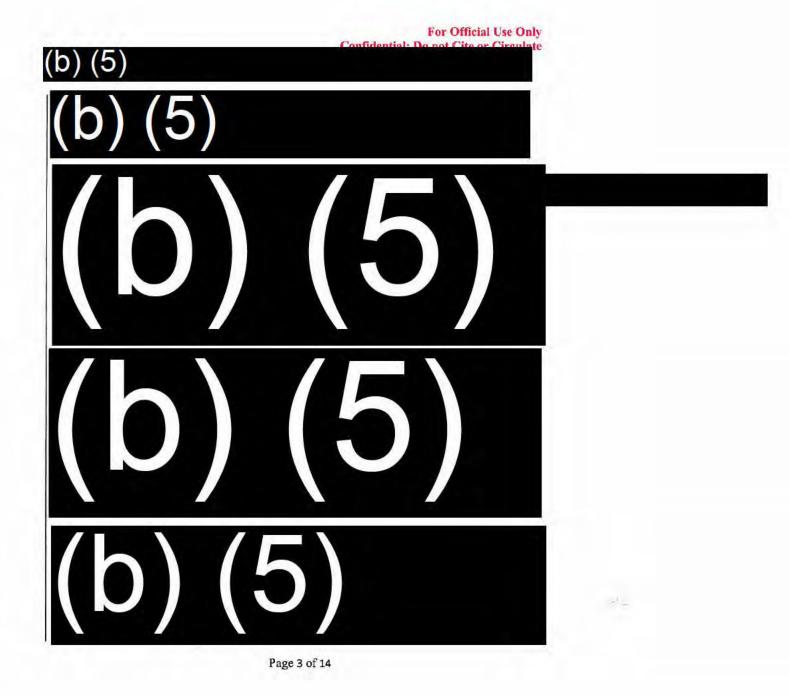
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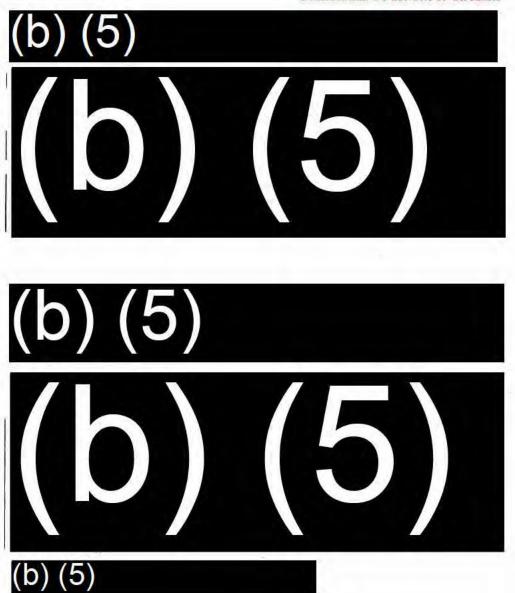
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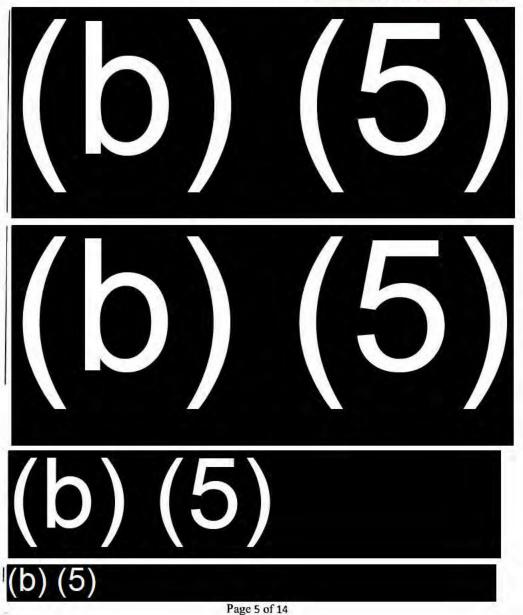
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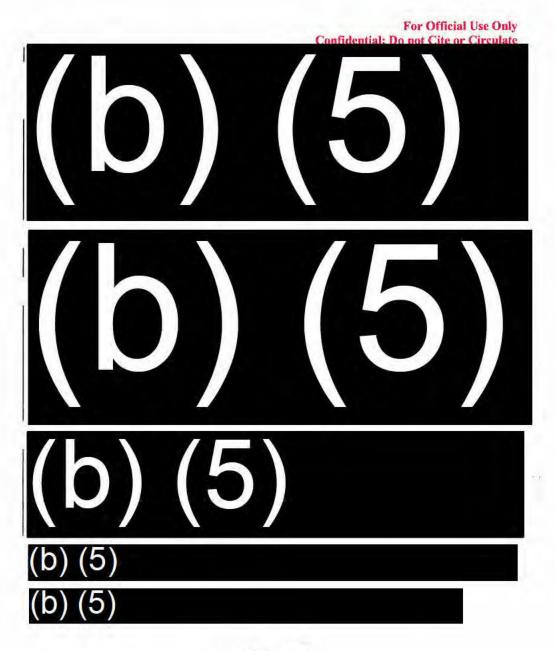
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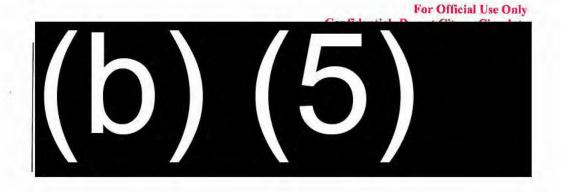
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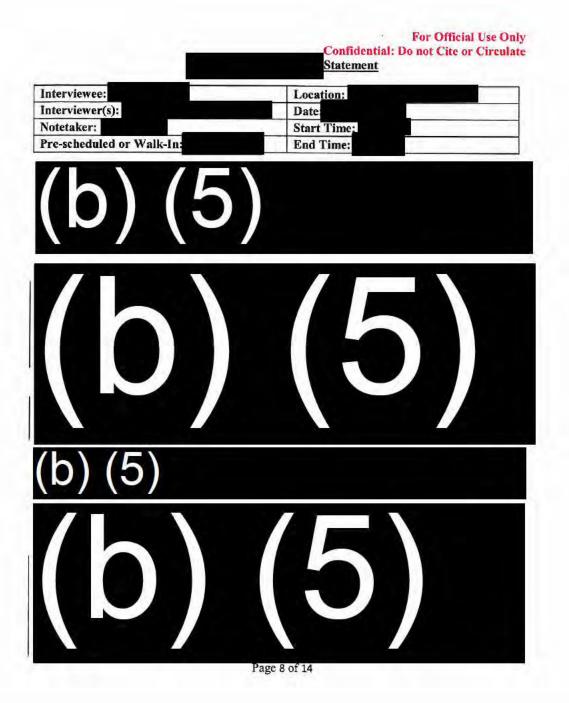
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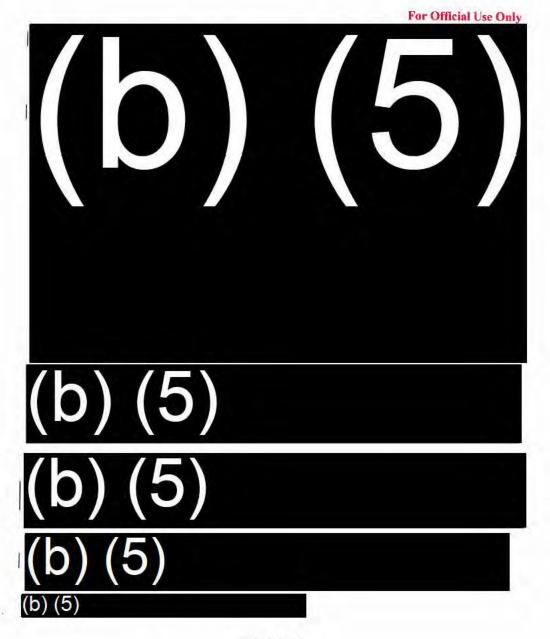


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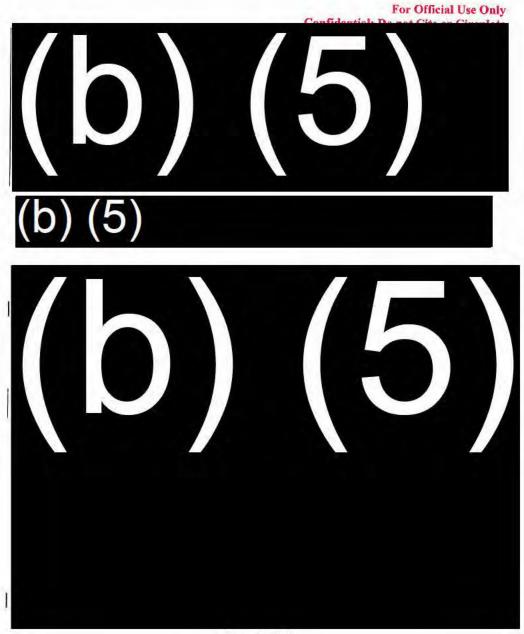


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Page 11 of 14

Print Name

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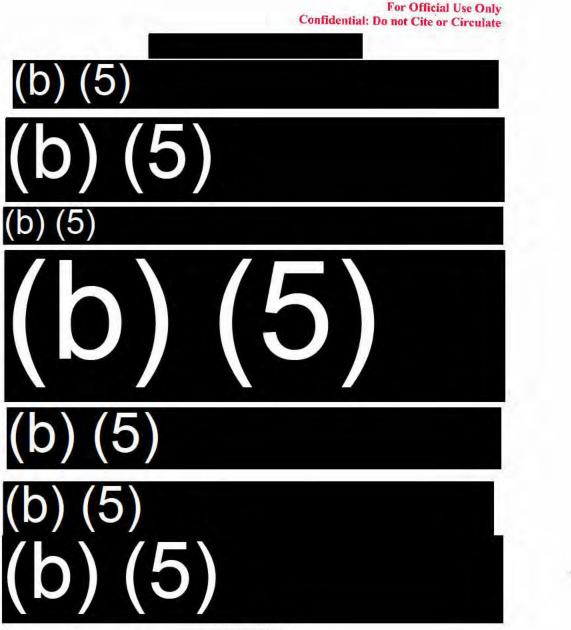
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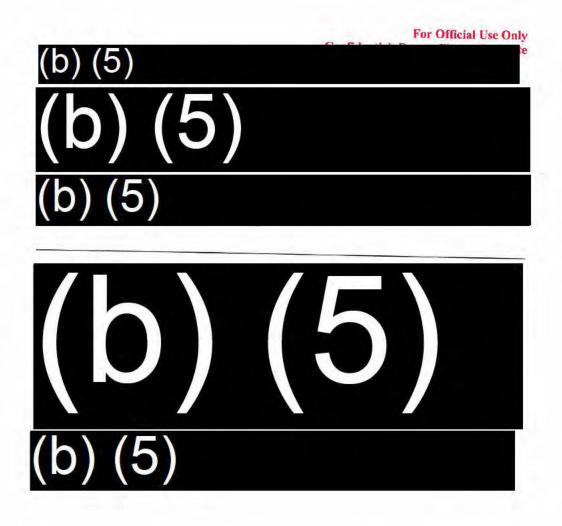
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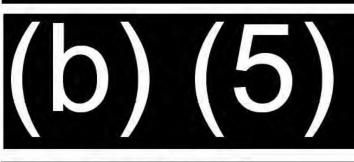
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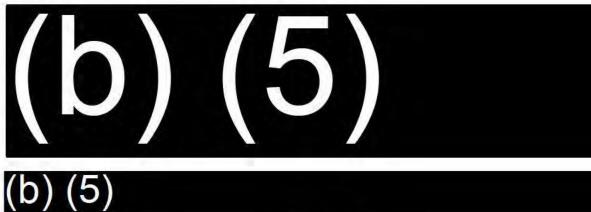
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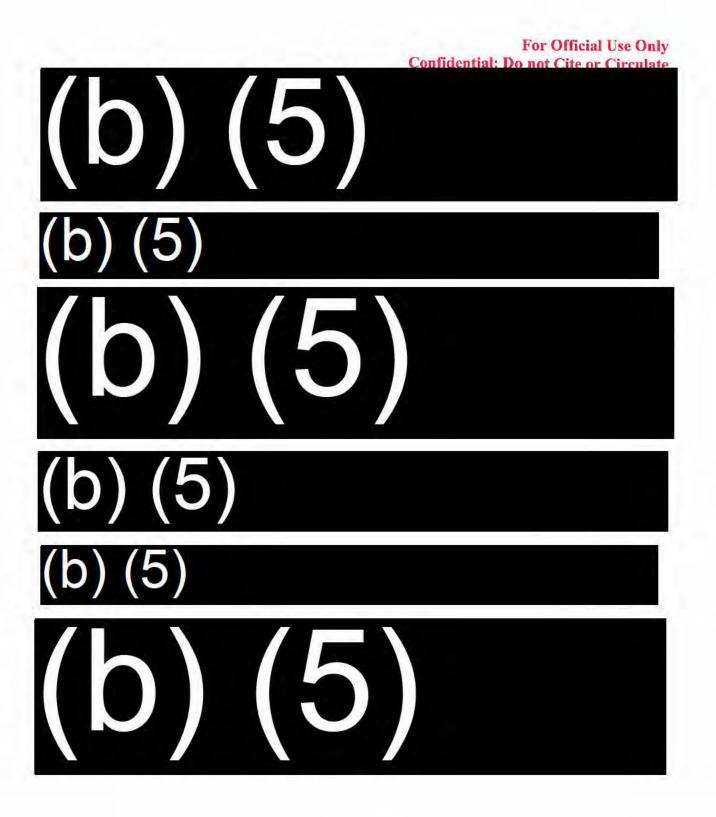
Interviewee:	Statement
	Location:
Interviewer(s):	Date
Notetaker:	Start Time:
Pre-scheduled or Walk-In:	End Time:



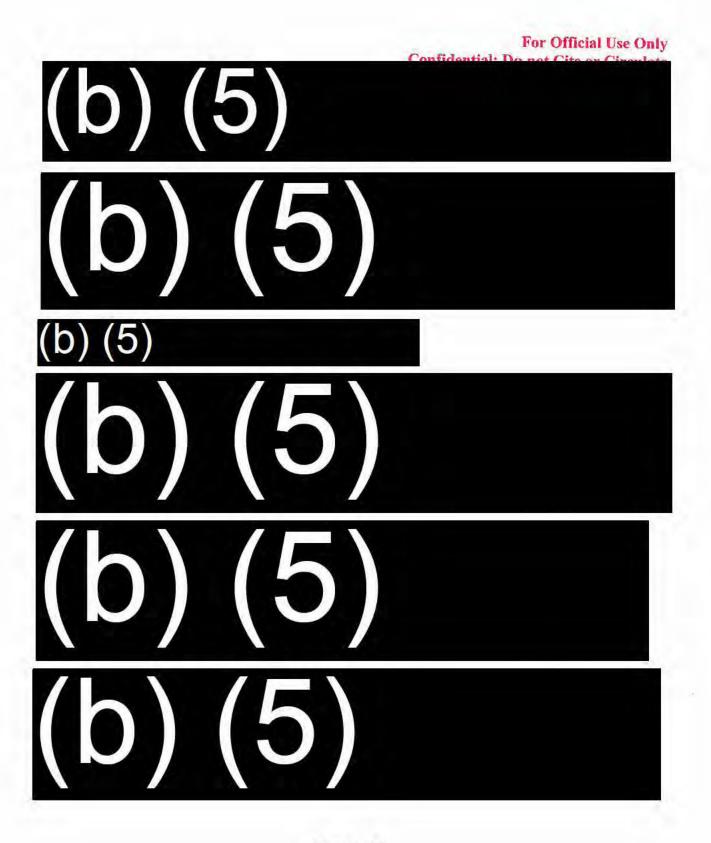
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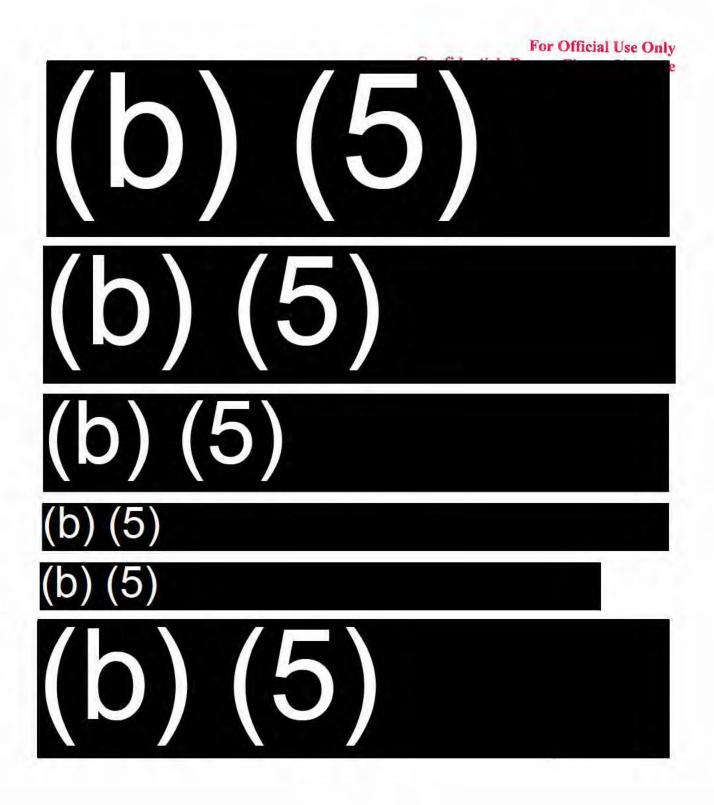
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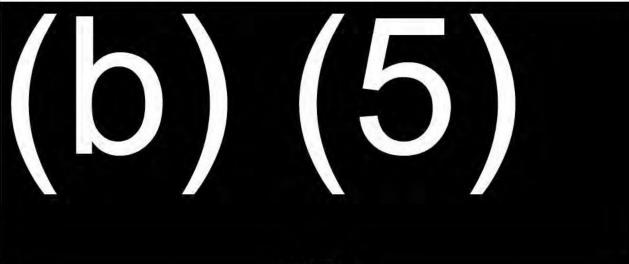
Page 4 of 8

For Official Use Only Confidential: Do not Cite or Circulate Statement

Interviewee:	Location:
Interviewer(s):	Date:
Notetaker:	Start Time:
Pre-scheduled or Walk-In:	End Time:



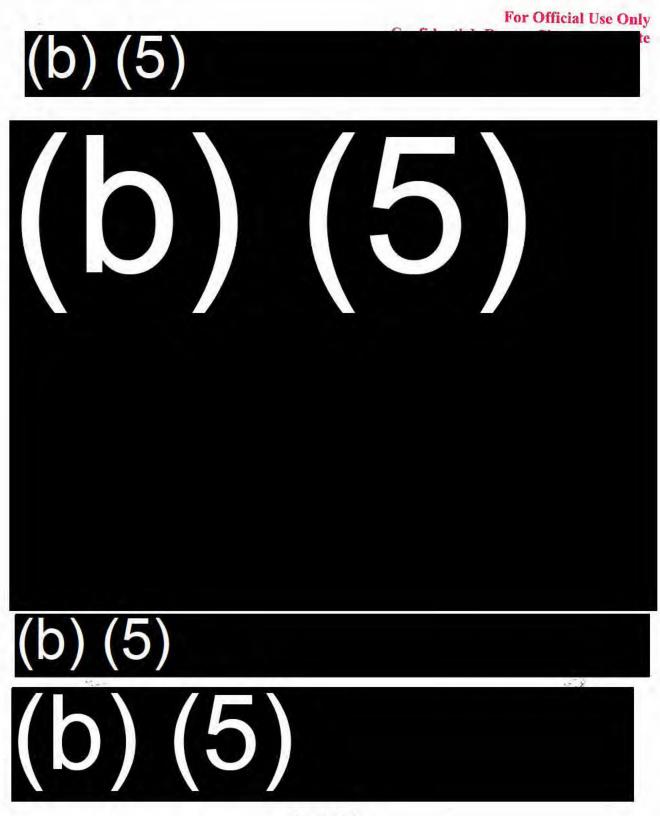




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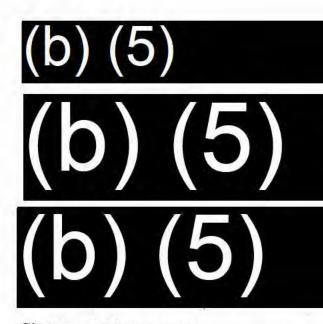




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Signature of Concurrence

I agree that the statement above accurately reflects the dates and conversations that I held with the aforementioned interviewers.

Print Name

Date

Signature

Page 8 of 8



For Official Use Only

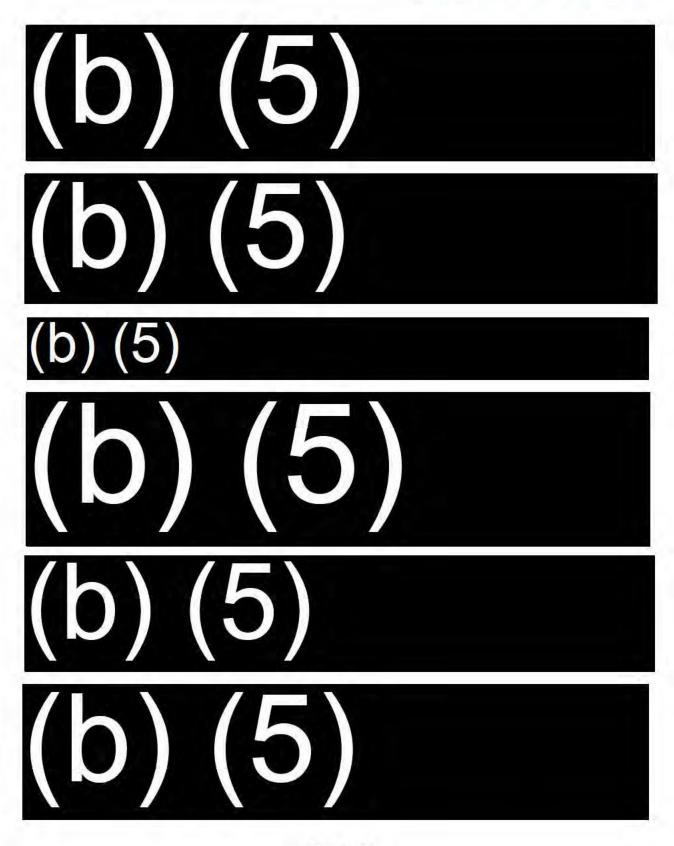
Confidential: Do not Cite or Circulate

	Statement
Interviewee:	Location:
Interviewer(s):	Date:
Notetaker:	Start Time:
Pre-scheduled or Walk-In:	End Time:
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	Page 1 of 6

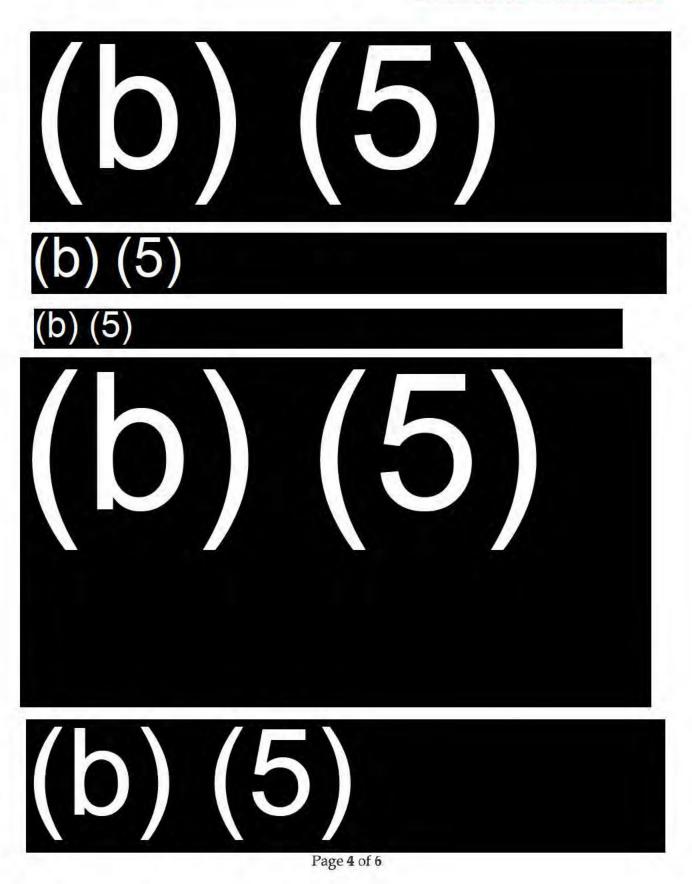
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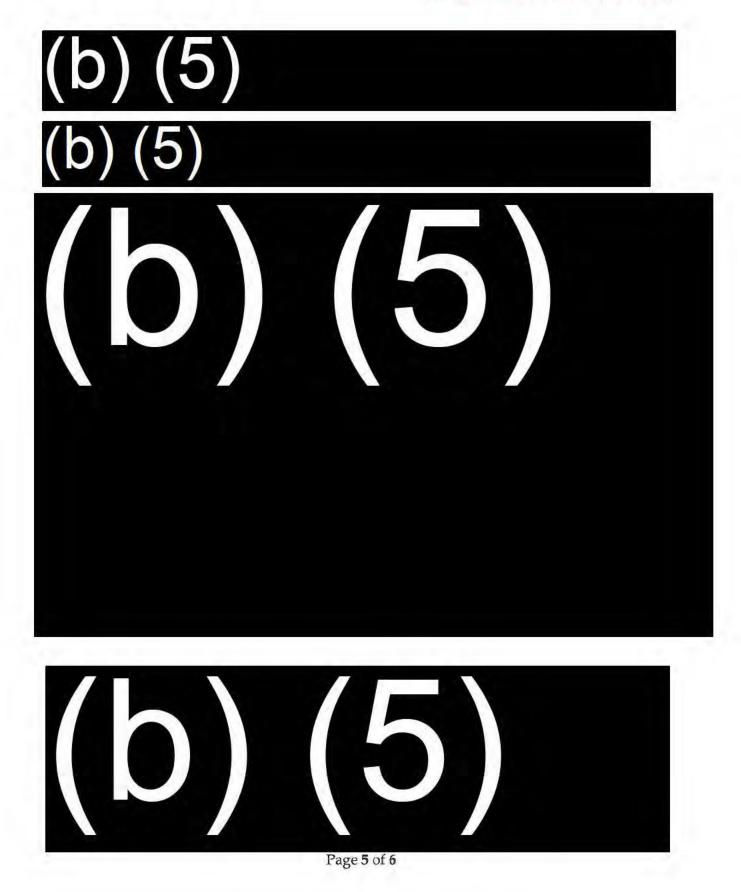
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Signature of Concurrence

I agree that the statement above accurately reflects the date and conversation that I held with the aforementioned interviewers.

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ADMINISTRATIVE INQUIRY OF FLORIDA KEYS NATIONAL MARINE SANCTUARY OIG COMPLAINT REFERRAL

STATEMENT COVER PAGE

The following statement is:

UNSIGNED

The interviewee of the following statement failed to return his/her statement to the Administrative Investigative Team (AIT) signed. Several attempts were made to supply the interviewee with an opportunity to review, edit and submit his/her statement. Each interviewee was sent their draft statement and given the opportunity to review and edit. Interviewees were also given the opportunity to submit an addendum to the statement if they recalled any additional information after the interview, or if they wanted to submit additional supporting documentation.

$X_{CONTAINS SUBSTANTIVE CONTENT CHANGES}$

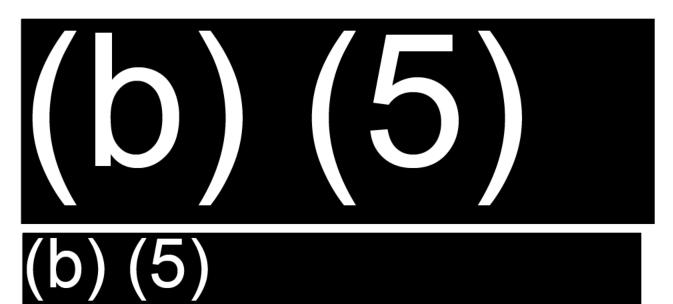
The interviewee of the following statement altered the substantive content of the interview as captured in the original draft statement. This determination was made by consensus of the entire AIT. Therefore, the interviewee's track changes version along with the original version and edited signed version are included in this report in order to accurately represent those differences. Interviewees that submitted edits such as these have been made aware that both versions are included in this final report. Where quotes from the interviewee's statement are excerpted in the Findings or Recommendations section of the AIT's report, they are drawn from the signed version of the statement.

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	Statement	
Interviewee:	Location:	
Interviewer(s):	Date:	
Notetaker:	Start Time:	
Pre-scheduled or Walk-In:	End Time:	

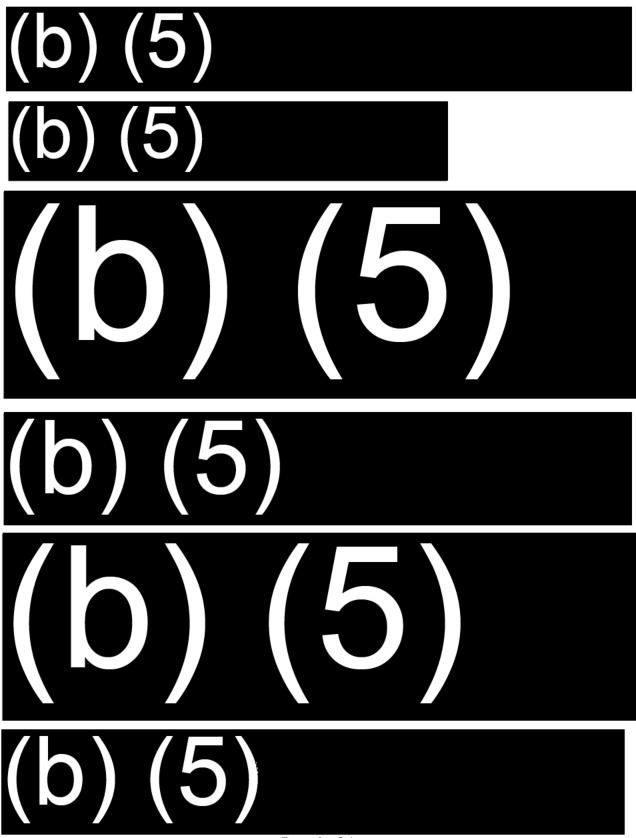






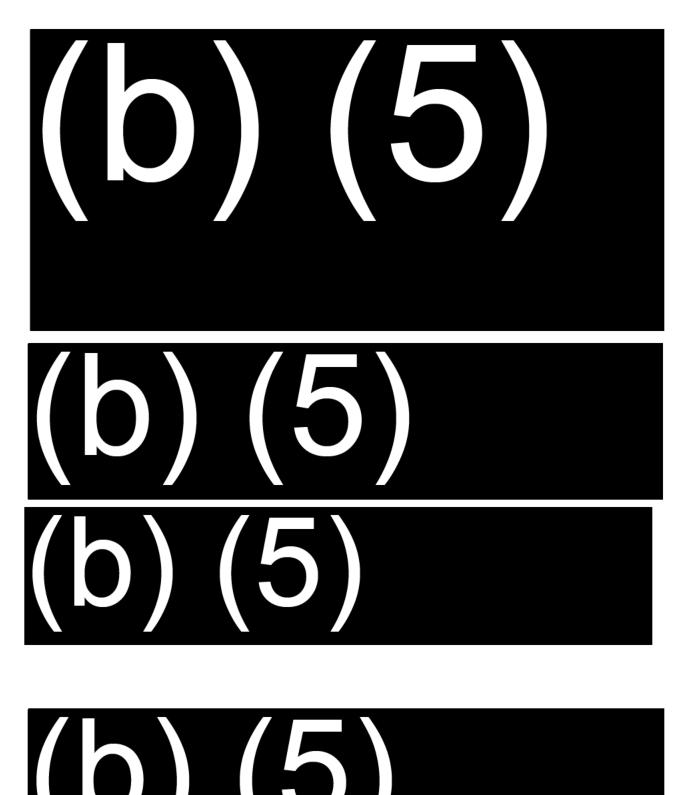
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Signature of Concurrence

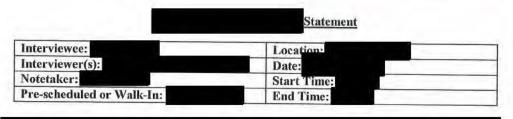
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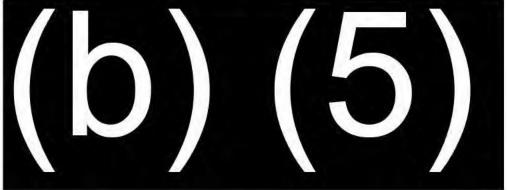
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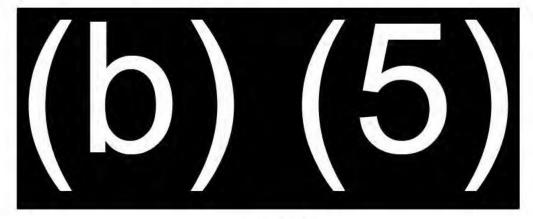
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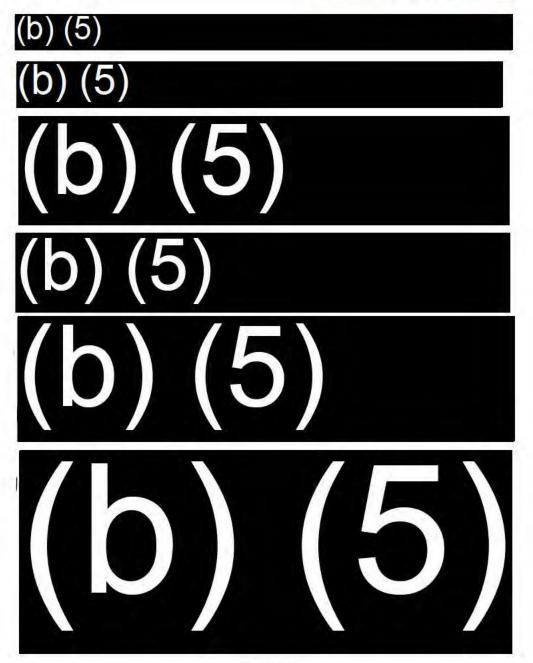




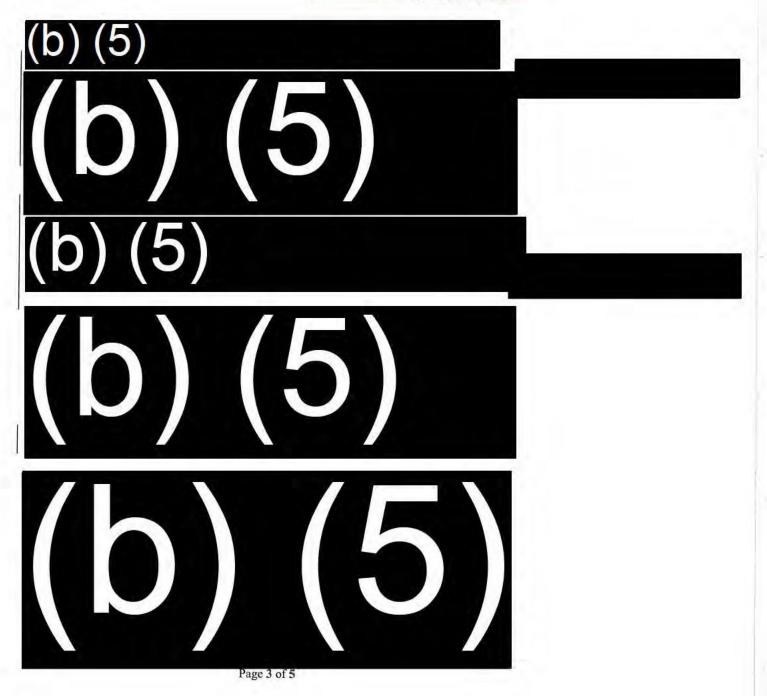


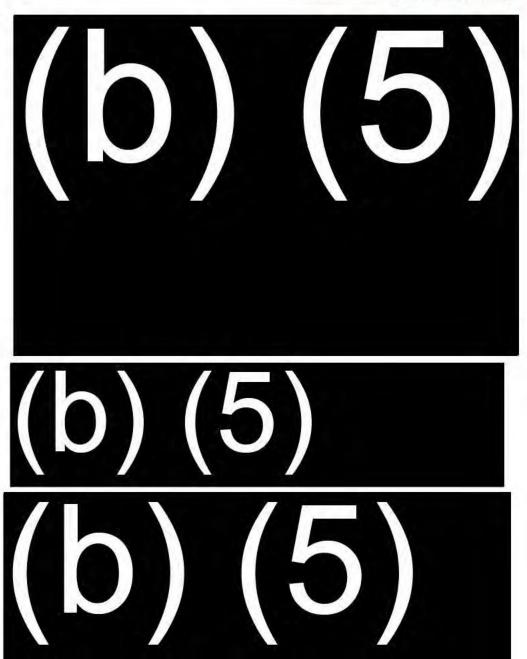
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Page 4 of 5

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Signature of Concurrence

I agree that the statement above accurately reflects the conversation that I held with the aforementioned interviewers on the aforementioned date.

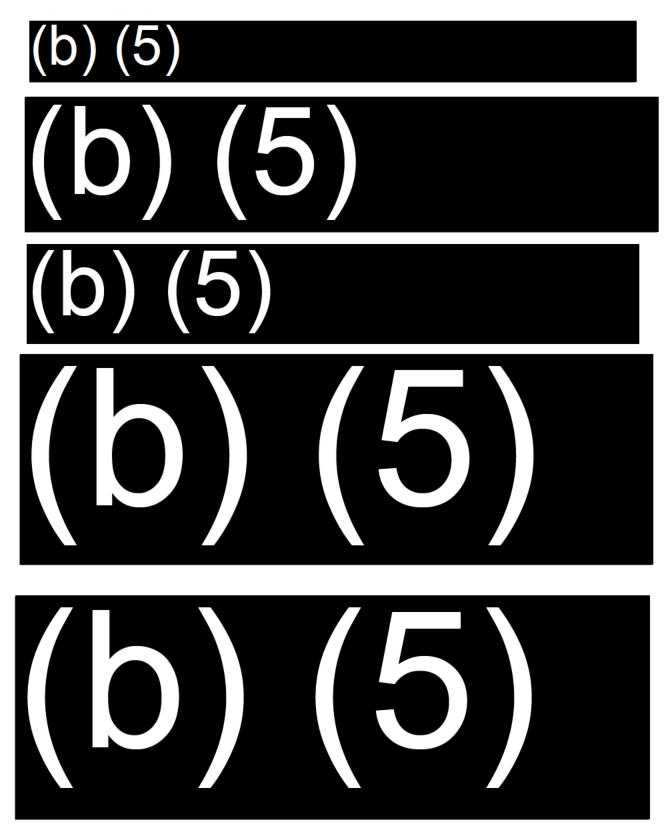
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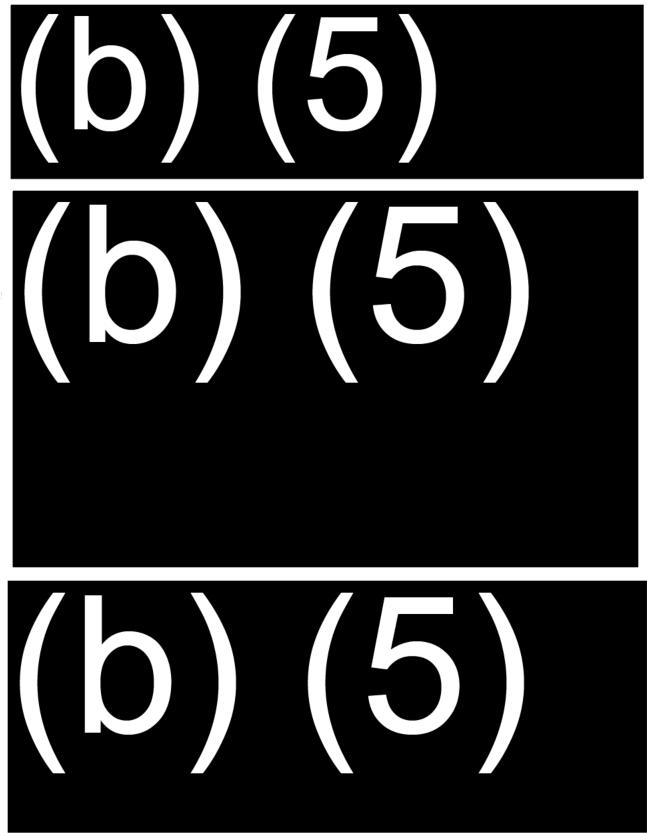
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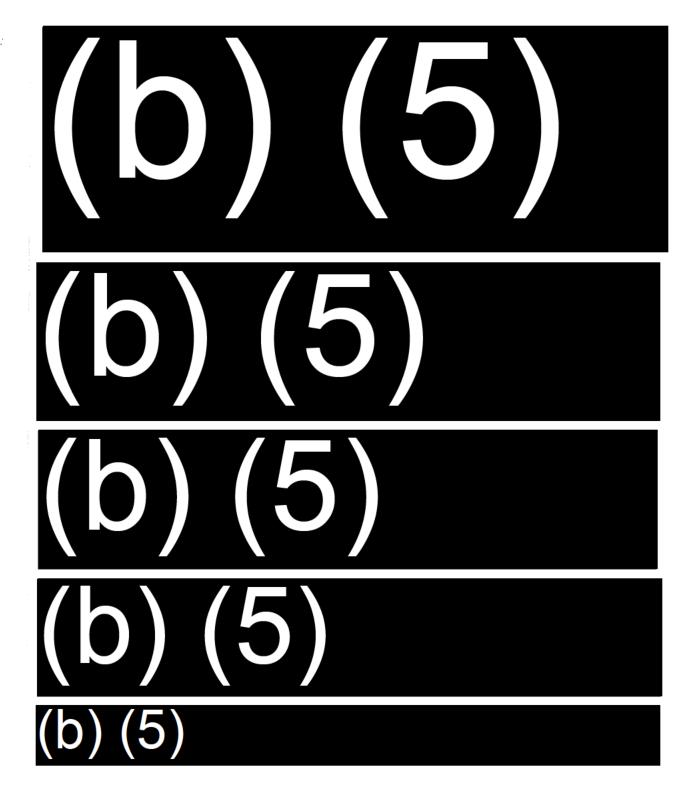
Interviewee: Interviewer(s): Notetaker: Pre-scheduled or Walk-In:	Statement Location: Date: Start Time: End Time:
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Page 4 of 5

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Signature of Concurrence

I agree that the statement above accurately reflects the conversation that I held with the aforementioned interviewers on the aforementioned data



ADMINISTRATIVE INQUIRY OF FLORIDA KEYS NATIONAL MARINE SANCTUARY

OIG COMPLAINT REFERRAL NO.

STATEMENT COVER PAGE

The following statement is:

UNSIGNED

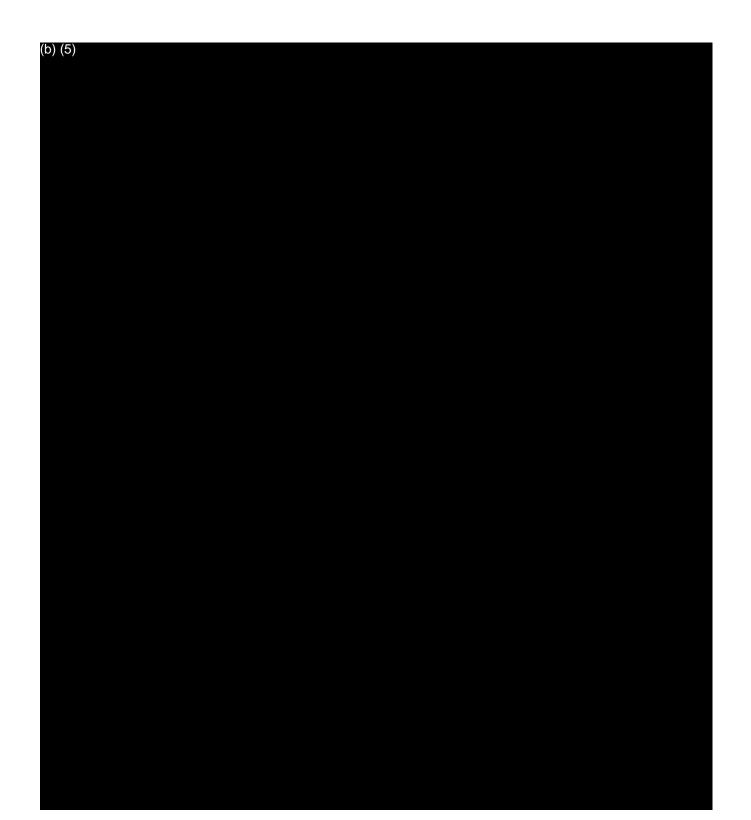
The interviewee of the following statement failed to return his/her statement to the Administrative Investigative Team (AIT) signed. Several attempts were made to supply the interviewee with an opportunity to review, edit and submit his/her statement. Each interviewee was sent their draft statement and given the opportunity to review and edit. Interviewees were also given the opportunity to submit an addendum to the statement if they recalled any additional information after the interview, or if they wanted to submit additional supporting documentation.

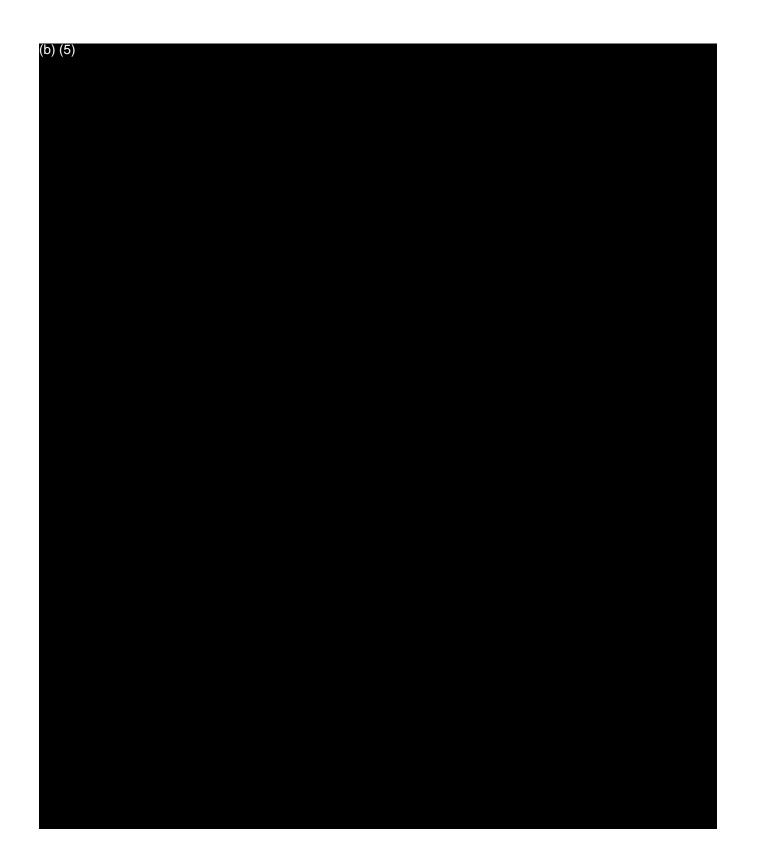
$X_{\rm CONTAINS}$ SUBSTANTIVE CONTENT CHANGES

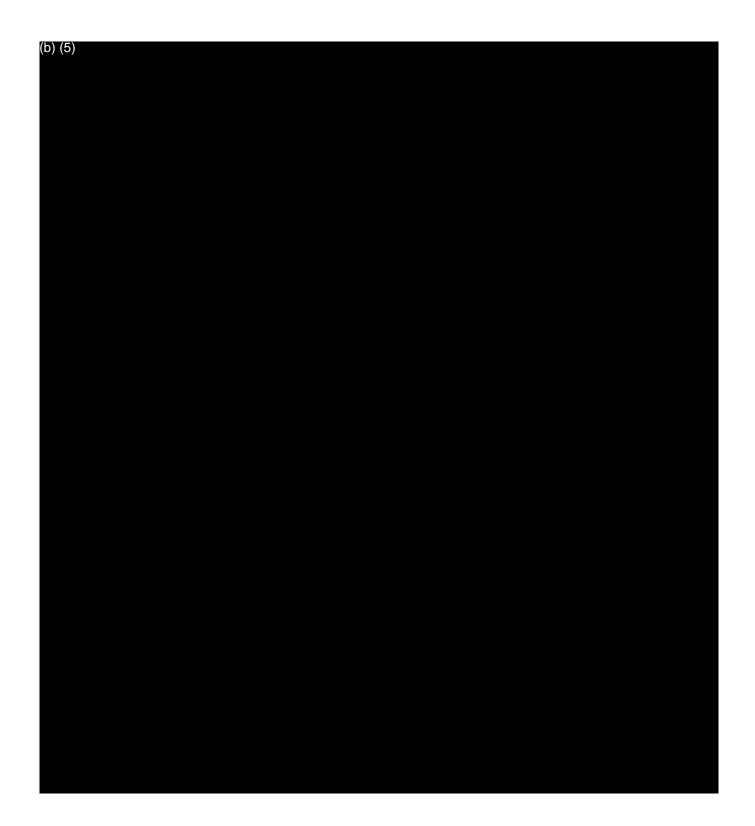
The interviewee of the following statement altered the substantive content of the interview as captured in the original draft statement. This determination was made by consensus of the entire AIT. Therefore, the interviewee's track changes version along with the original version and edited signed version are included in this report in order to accurately represent those differences. Interviewees that submitted edits such as these have been made aware that both versions are included in this final report. Where quotes from the interviewee's statement are excerpted in the Findings or Recommendations section of the AIT's report, they are drawn from the signed version of the statement.

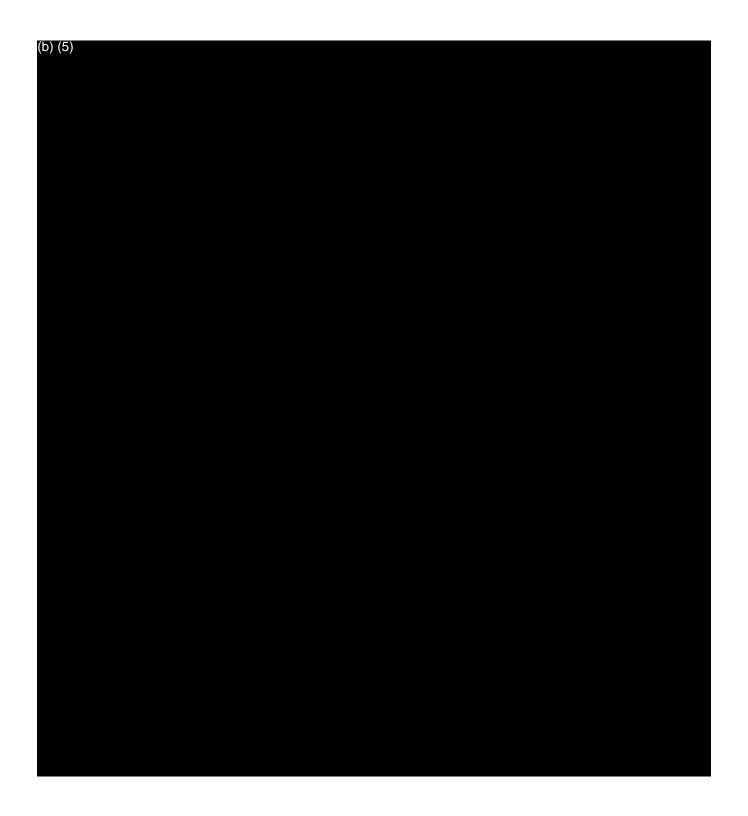
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Interviewer(s):	Date:		
Notetaker:	Start Time:		
Pre-scheduled or Walk-In:	End Time:		

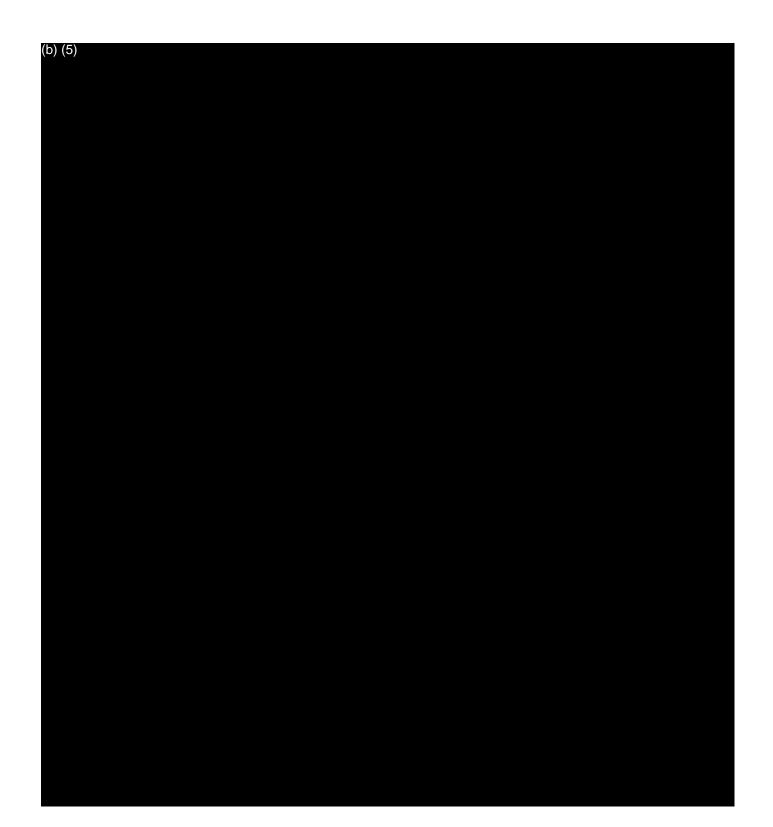
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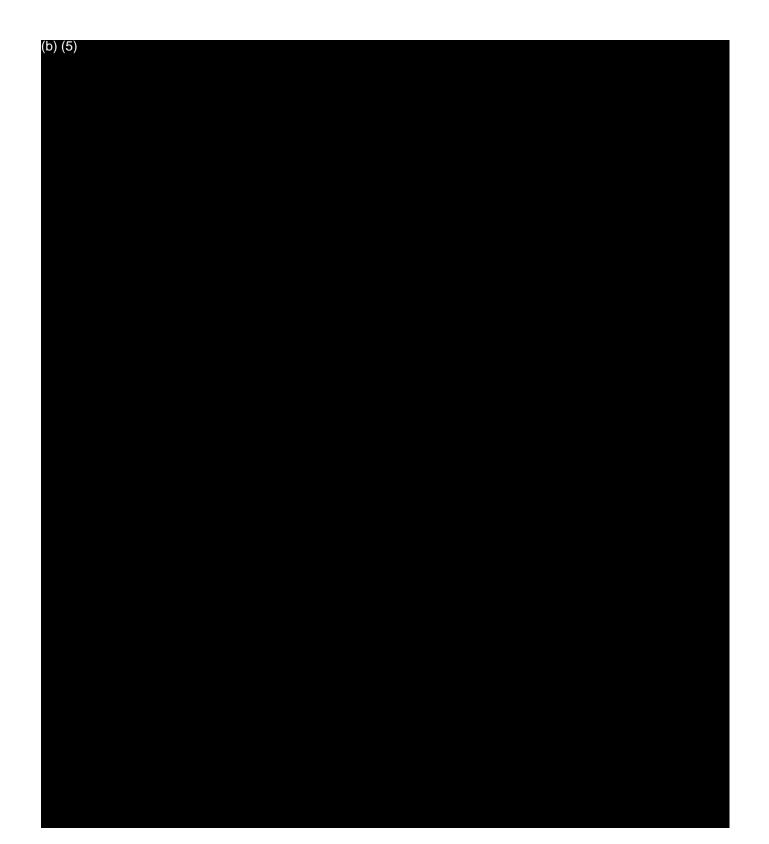




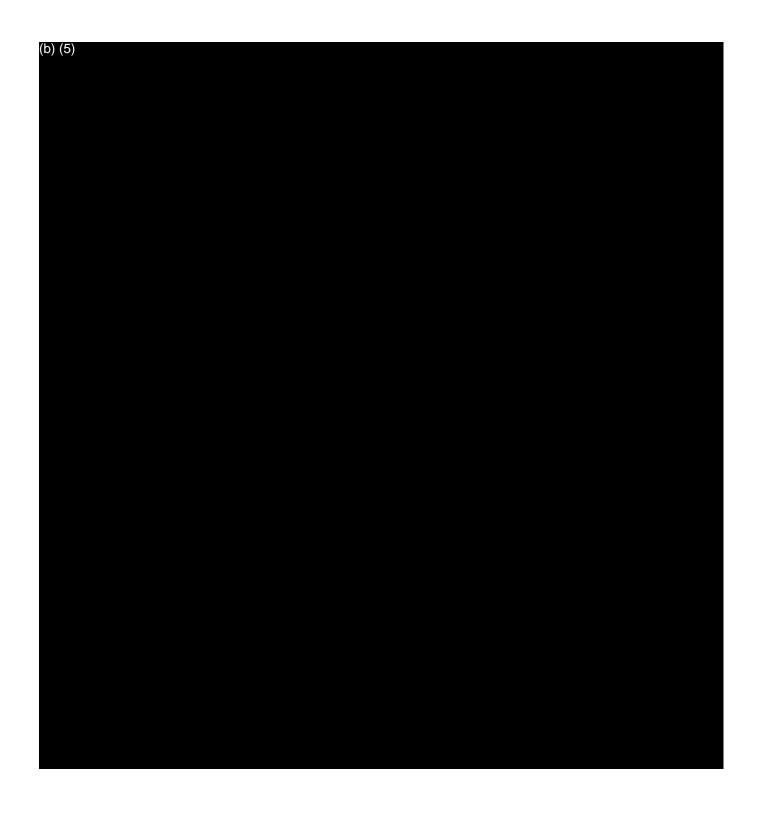


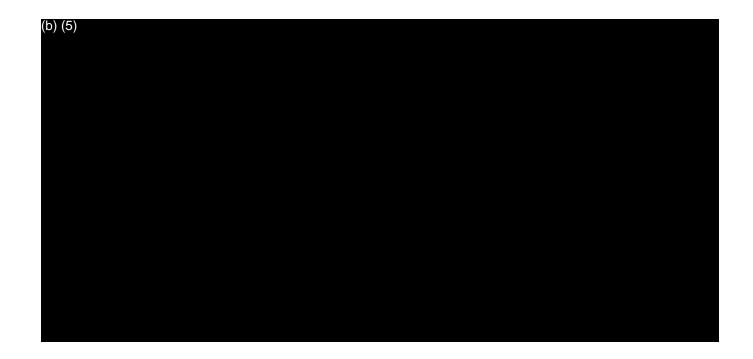








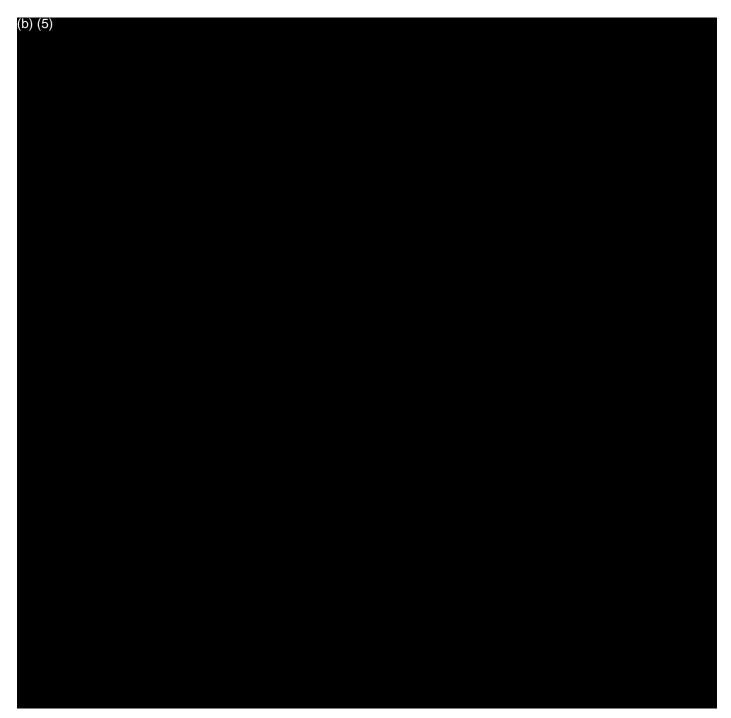




	<u>Statement</u>
Interviewee:	Location:
Interviewer(s):	Date:
Notetaker:	Start Time:
Pre-scheduled or Walk-In:	End Time:







Signature of Concurrence

I agree that the statement above accurately reflects the dates and conversations that I held with the aforementioned interviewers.

Print Name

Date

Signature

	Statement
Interviewee:	Location:
Interviewer(s):	Date:
Notetaker:	Start Time:
Pre-scheduled or Walk-In:	End Time:

(b) (5)

