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**NATIONAL SECURITY AGENCY/CENTRAL SECURITY
SERVICE**



INSPECTOR GENERAL

REPORT OF INVESTIGATION

30 April 2013

IV-12-0090

Misuse of GTCC

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UNCLASSIFIED**(U) OFFICE OF THE INSPECTOR GENERAL**

(U) Chartered by the NSA Director and by statute, the Office of the Inspector General conducts audits, investigations, inspections, and special studies. Its mission is to ensure the integrity, efficiency, and effectiveness of NSA operations, provide intelligence oversight, protect against fraud, waste, and mismanagement of resources by the Agency and its affiliates, and ensure that NSA activities comply with the law. The OIG also serves as an ombudsman, assisting NSA/CSS employees, civilian and military.

(U) AUDITS

(U) The audit function provides independent assessments of programs and organizations. Performance audits evaluate the effectiveness and efficiency of entities and programs and their internal controls. Financial audits determine the accuracy of the Agency's financial statements. All audits are conducted in accordance with standards established by the Comptroller General of the United States.

(U) INVESTIGATIONS

(U) The OIG administers a system for receiving complaints (including anonymous tips) about fraud, waste, and mismanagement. Investigations may be undertaken in response to those complaints, at the request of management, as the result of irregularities that surface during inspections and audits, or at the initiative of the Inspector General.

(U) INTELLIGENCE OVERSIGHT

(U) Intelligence oversight is designed to insure that Agency intelligence functions comply with federal law, executive orders, and DoD and NSA policies. The IO mission is grounded in Executive Order 12333, which establishes broad principles under which IC components must accomplish their missions.

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IV-12-0090

I. (U) SUMMARY

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(U//~~FOUO~~) The NSA Office of Inspector General (OIG) opened an investigation regarding an allegation that [redacted] an NSA civilian employee assigned to Analysis and Production, [redacted] had misused his Government travel credit card (GTCC). Specifically, it was alleged that [redacted] used his GTCC for personal purchases and cash advances not related to any approved Government purpose.

(U//~~FOUO~~) The OIG investigation included an interview with [redacted] contact with his supervisor, representatives from [redacted] and Employee Relations (ER); analysis of his GTCC statements for the period May 2011 to July 2012; and review of his training profile. Analysis of [redacted] GTCC statements for the period in question revealed an unpaid balance of \$2749.30 in May 2012. [redacted] acknowledged that he used his GTCC for personal expenses during the time in question due to experiencing personal financial difficulty. In May 2012, the account was canceled and [redacted] entered into a voluntary reduced payment plan with CitiBank. A voluntary reduced payment plan is an agreement between CitiBank and the cardholder that monthly payments, less than the account balance, will be made until the balance is paid in full. [redacted] informs cardholders of this option in their standard e-mail messages regarding past due accounts. Participation in CitiBank's voluntary reduced payment plan is a way to avoid placement in the Agency's involuntary salary offset plan. [redacted] satisfied the debt and paid his account, in full, in July 2012.

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(U//~~FOUO~~) The preponderance of the evidence supports the conclusion that [redacted] misused his GTCC by using it to make purchases and cash advances that were not related to Government travel. Additionally, he repeatedly failed to pay his GTCC balance in a timely manner. His actions were in violation of 5 CFR § 2635.101 (b), Basic Obligation of Public Service, Subpart A: General Provisions; 5 CFR § 2635.704, (a), Use of Government Property; DoD Financial Management Regulation (FMR) § 7004.14-R, Volume 9, Chapter 3, Subparagraph 031003, Misuse; and NSA/CSS PMM, Chapter 366, § 1-3, (h), General Principles for On-The-Job Conduct.

(U//~~FOUO~~) Copies of the OIG report will be forwarded to MR, Employee Relations, for action deemed appropriate and D23, the Office of General Counsel (Administrative Law) for information. A summary of the investigative findings will be forwarded to the Associate Directorate for Security and Counterintelligence (ADS&CI), Q234 (Special Actions) for information.

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II. (U) BACKGROUND

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(b) (6)**(U) Introduction**

(U//FOUO) [redacted] entered on duty at NSA on [redacted]. He has been employed as an [redacted] since 2010. [redacted] has accepted a position as a [redacted] which he will begin in April 2013.

(U//FOUO) On 17 May 2012, the OIG received information from [redacted] Chief, [redacted] evidencing that [redacted] had misused his GTCC. Specifically, it was alleged that [redacted] used the GTCC for personal purchases and cash advances not related to any approved Government purpose. On 11 May 2012, [redacted] notified [redacted] via e-mail that his GTCC account was over 90 days past due; therefore, the account would be canceled on 17 May 2012, if it reached 120 days past due.

(U//FOUO) An initial review of [redacted] GTCC statements for the period May 2011 to July 2012, revealed multiple charges every month, except in June, September, and November 2011, when [redacted] did not use the card. The charges included six cash advance fees, two late payment charges, and two returned check fees. The statements show monthly payments were made to the account during the period in question; however, the payments were often less than the balance on the account. Four payments, totaling \$6889.58, were returned due to insufficient funds in the account. [redacted] supervisor verified [redacted] did not have any official travel during the period in question and was not authorized to use the GTCC for any other purpose.

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(U) Applicable Authorities

(U//FOUO) The investigation looked at possible violations of the following authorities. Full citations are contained in Appendix A.

- (U) 5 CFR § 2635.101 (b), Basic Obligation of Public Service, General Provisions
- (U) 5 CFR § 2635.704, (a), Use of Government Property
- (U) DoD Financial Management Regulation (FMR) §7004.14-R, Volume 9, Chapter 3, Subparagraph 031003, Misuse
- (U//FOUO) NSA/CSS PMM, Chapter 366, § 1-3, (h), General Principles for On-The-Job Conduct

III. (U) FINDINGS

(U//~~FOUO~~) Did [redacted] misuse his government travel credit card?

(U//~~FOUO~~) **CONCLUSION: Substantiated.** The preponderance of the evidence supports the conclusion that [redacted] misused his issued GTCC, in violation of 5 CFR, § 2635.101 (b), Basic Obligation of Public Service, General Provisions; 5 CFR, § 2635.704, (a), Use of Government Property; DoD Financial Management Regulation (FMR) §7004.14-R, Volume 9, Chapter 3, Subparagraph 031003, Misuse; and NSA/CSS PMM, Chapter 366, § 1-3, (h), General Principles for On-The-Job Conduct.

(U) Evidence

(U//~~FOUO~~) Documentary Evidence

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(U) GTCC Statements

(U//~~FOUO~~) The OIG obtained [redacted] GTCC statements for the period of May 2011 to July 2012 (Appendix B). Analysis of these statements revealed personal charges and cash advances not related to any Government travel, totaling \$6381.11, within the time period in question. The statements showed [redacted] made monthly payments on the account; however, most payments were less than the monthly balance on the account. Four attempted payments, totaling \$6889.58, were returned due to insufficient funds in the account and two returned check fees were issued, totally \$58. Six cash advance fees were charged, totaling over \$32 and two late payment charges were issued, totaling \$58. The balance was paid in July 2012.

(U) Delinquency Notices

(U//~~FOUO~~) Representatives of [redacted] sent [redacted] two delinquency notices via e-mail regarding his GTCC account (Appendix C). The first notice, dated 15 March 2012, advised [redacted] that his GTCC account was over 45 days delinquent and would be suspended as of 23 February 2012. The second notice, dated 11 May 2012, informed [redacted] that his account was over 90 days delinquent and would be canceled on 17 May 2012, when it became 120 days delinquent.

(U//~~FOUO~~) NSA/CSS Corporate Travel Gram Issue 01- 2008 (Revision to Issue 01-2008) July 2009, Department of Defense Government Travel Card Procedures.

(U//~~FOUO~~) This guidance is published on the [redacted] web page and it details the basic NSA/CSS policy and procedures for mandatory use of the GTCC (Appendix D).

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(U//~~FOUO~~) Testimonial Evidence

(U//~~FOUO~~) [redacted] was interviewed by the OIG on 13 December 2012 and 28 February 2013, and testified as follows.

(U//~~FOUO~~) [redacted] began experiencing personal financial difficulty in approximately 2006 [redacted] and he became financially responsible for her food, medications, medical bills, and other expenses. In 2007 [redacted] was unable to regularly pay his mortgage and other bills on time; therefore, he filed for Chapter 13 bankruptcy, which included debts of approximately [redacted]. Beginning in 2007, [redacted] was deducted from [redacted] biweekly paycheck to repay his bankruptcy debt. In 2009 and 2010 [redacted] experienced several [redacted]. He incurred medical bills from the [redacted] which added to his financial struggle.

(b) (6)

(U//~~FOUO~~) He first used his GTCC for non-Government related purchases in [redacted] when he charged a \$2,000 vehicle down-payment on the card. [redacted] acknowledged that in the process of purchasing a vehicle he wrote a \$2,000 check for the down-payment. However, he did not have sufficient funds in his account to cover the down-payment and the check was returned. [redacted] then used his GTCC to charge the down-payment. After using the GTCC to pay for the down-payment on his vehicle in [redacted] [redacted] began using the card regularly for cash advances and personal purchases on almost a monthly basis. He used the card for personal purchases in eight out of the eleven months in question. [redacted] explained that he used the cash advances to assist in his mortgage payments. He asserted that he never used his GTCC for personal purchases at any time other than the period in question.

(U//~~FOUO~~) In May 2012, a representative of [redacted] contacted [redacted] supervisor, [redacted] and informed him of the past-due status of [redacted] GTCC account. When [redacted] questioned [redacted] regarding the matter, [redacted] initially denied using the account for personal purchases and told [redacted] that a mistake had been made and the charges initiated from a 2009 TDY assignment with his previous office. [redacted] then contacted an unrecalled representative from Employee Relations (ER) after speaking with [redacted] and informed the individual that he had accidentally given the GTCC to his wife, who had used it on one occasion. [redacted] acknowledged during this interview that he was not honest with [redacted] or the ER representative initially, because he was embarrassed. He asserted that he told [redacted] and the ER representative the truth one day after he initially spoke to them. The e-mail, sent from [redacted] to [redacted] is attached in Appendix E.

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(U//~~FOUO~~) [redacted] paid the balance on the GTCC in July 2012. Since the card was suspended in March 2012, [redacted] has not used the card. His GTCC was canceled in May 2012; however, [redacted] expects to have the card reinstated when he begins employment in [redacted] in April 2013. [redacted] explained that he is remorseful about using the card for personal purchases and stated he will never use his GTCC for anything other than official Government purposes in the future. He explained that his financial situation has improved, as the [redacted]. [redacted] Additionally, in fall 2012, in cooperation with the terms of his bankruptcy, [redacted] attended a [redacted] which taught him budgeting skills and made him aware of financial

services available to him if he experienced similar difficulties in the future. [redacted] also refinanced his mortgage in 2012, which reduced his monthly payment.

(U//~~FOUO~~) Following his interview with the OIG on 13 December 2012, [redacted] sent an e-mail to the OIG, which stated he accepts "full responsibility" for his actions and included an apology. The e-mail is attached in Appendix

(U//~~FOUO~~) [redacted] Chief, [redacted] was contacted via e-mail on 10 December 2012.

(U//~~FOUO~~) [redacted] verified that he has been [redacted] direct supervisor since October 2010. [redacted] did not travel on any TDY assignments during the period in question (May 2011 to July 2012). Additionally, to [redacted] knowledge, [redacted] was not authorized to use his GTCC for local travel or any other purposes.

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(U) Analysis and Conclusions

(U//~~FOUO~~) Our analysis of [redacted] GTCC statements from May 2011 to July 2012 revealed unauthorized personal purchases and cash advances in the amount of \$6381.11. During the time period in question, [redacted] did not travel on any TDY assignments, nor was he authorized to use his GTCC for any other reason. [redacted] acknowledged that he knew he should not use the GTCC for personal purchases and cash advances; however, out of what he felt was financial desperation, he did not believe he had any other options.

(U//~~FOUO~~) The preponderance of the evidence supports the conclusion that [redacted] misused his issued GTCC. The OIG's analysis of [redacted] GTCC statements for the period in question revealed that he consistently used his GTCC for personal purchases and cash advances. His actions were in violation of 5 CFR, § 2635.101 (b), Basic Obligation of Public Service, Subpart A: General Provisions; 5 CFR, § 2635.704, (a), Use of Government Property; DoD Financial Management Regulation (FMR) §7004.14-R, Volume 9, Chapter 3, Subparagraph 031003, Misuse; and NSA/CSS PMM, Chapter 366, § 1-3, (h), General Principles for On-The-Job Conduct.

IV. (U) RESPONSE TO TENTATIVE CONCLUSION

(U//~~FOUO~~) [redacted] provided two responses, via e-mail, to the tentative conclusions. The information provided by [redacted] did not impact the findings of the OIG investigation. [redacted] responses are attached in Appendix G.

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V. (U) CONCLUSION

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(U//~~FOUO~~) The preponderance of the evidence supports the conclusion that [redacted] misused his issued GTCC, in violation of 5 CFR, § 2635.101 (b), Basic Obligation of Public Service, Subpart A: General Provisions; 5 CFR, § 2635.704, (a), Use of Government Property; DoD Financial Management Regulation (FMR) §7004.14-R, Volume 9, Chapter 3, Subparagraph 031003, Misuse; and NSA/CSS PMM, Chapter 366, § 1-3, (h), General Principles for On-The-Job Conduct.

VI. (U) DISTRIBUTION OF RESULTS

(U//~~FOUO~~) A copy of this report of investigation will be provided to:

1. M/ER for information and any appropriate action.
1. OGC, Administrative Law, D23, for information, and;
2. Q234, Special Actions, for information and any appropriate action.

Concurred by:

[Redacted Signature]

Investigator

(b) (3) - P.L. 86-36

[Redacted Signature]

Assistant Inspector General
for
Investigations

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APPENDIX A

(U) Applicable Authorities

Personnel Privileged Information
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(U) 5 CFR § 2635.101 (b), Basic Obligation of Public Service, Subpart A: General Provisions

b. 9. (U) Employees shall protect and conserve Federal property and shall not use it for other than authorized activities.

(U) 5 CFR § 2635.704, (a), Use of Government Property

a. (U) Standard. An employee has a duty to protect and conserve Government property and shall not use such property, or allow its use, for other than authorized purposes.

(U//~~FOUO~~) NSA/CSS PMM, Chapter 366, Section 1-3, (h), General Principles for On-The-Job Conduct

1-3. (U//~~FOUO~~) Generally, every employee is expected to:

H. (U//~~FOUO~~) Conserve, protect, and properly use Federal funds, property, equipment, and materials.

(U) DoD Financial Management Regulation (FMR) §7004.14-R, Volume 9, Chapter 3, Subparagraph 031003, Misuse

Misuse of the GTCC will not be tolerated. Commanders/supervisors will ensure GTCCs are issued only for official travel related expenses. Examples of misuse include, but are not limited to:

- (a) expenses related to personal, family, or household purposes,
- (b) cash withdrawals from ATMs or banks when not related to official Government travel requirements,
- (c) intentional failure to pay undisputed charges in a timely manner, and
- (d) ATM cash withdrawals taken more than three days prior to the official Government travel.

Cardholders who misuse their GTCC may be subject to administrative or disciplinary action, as appropriate.

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APPENDIX B

(U) GTCC Statements

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Account Number	Due Date	Total Amount Due	Enter Amount Paid
	06/17/2011	\$2,000.00	

[Redacted]

Address Correspondence to:
CITIBANK GOVERNMENT CARD SERVICES,
P.O. Box 183173
COLUMBUS, OH 43218-3173

For telephone or address change on travel cards, please place an X in the parentheses and make the desired changes on the reverse side ()

Payment coupon: Please cut along perforation and return this portion with your payment. Make check or money order payable in U.S. dollars on a U.S. bank to Citibank. Include account number on check or money order. No cash please. Do not staple or tape your check to this coupon.

CITIBANK GOVERNMENT CARD SERVICES
CARD STATEMENT

Previous Balance	Payments And Credits	New Charges	New Balance
- \$0.02		\$2,000.02	\$2,000.00

Invoice Date
05/23/2011
Due Date
06/17/2011

FOR CUSTOMER SERVICE CALL 1-800-200-7058 OR WRITE P.O. Box 6408, SIOUX FALLS SD, 57117-6408
OUTSIDE THE U.S. AND CANADA CALL COLLECT 757-852-9076
SEND PAYMENTS TO: CITIBANK GOVERNMENT CARD SERVICES, P.O. Box 183173 COLUMBUS, OH 43218-3173

Agency Name:	Account Number
Accounting Code/Cost Center	
Billing Office Id:	Agency/Org Id:
Discretionary Code:	Tax Exempt#:
Single Purchase Limit: \$0.00	Cycle Purchase Limit: \$0.00

Sale Date	Post Date	MCC Code	Reference Number	Description	Total Amount
05/03/2011	05/03/2011				\$0.02
05/21/2011	05/23/2011				\$2,000.00
*****TOTAL AMOUNT DUE:					\$2,000.00

(b) (6)

ACCOUNT SUMMARY CURRENT PERIOD		Previous Balance	Payments	Credits	Purchases and Advances	Taxes and Fees	New Balance
	Purchases Advances TOTALS	- \$0.02			\$2,000.02		\$2,000.00
		- \$0.02			\$2,000.02		\$2,000.00

Memo Section	Amount Over Credit Limit:	\$0.00
	Amount Past Due:	\$0.00
	Net Total Charges:	\$2,000.02
	Total Cash Advances:	\$0.00
	Current Period Total:	\$2,000.02

Approval Section

CARDHOLDERS SIGNATURE

APPROVING OFFICIAL SIGNATURE(Except Travel)

(b) (3) - P.L. 86-36
(b) (6)



[Redacted]

Account Number	Due Date	Total Amount Due	Enter Amount Paid
[Redacted]	07/18/2011	\$0.00	

[Redacted]

Address Correspondence to:
CITIBANK GOVERNMENT CARD SERVICES,
P.O. Box 183173
COLUMBUS, OH 43218-3173

For telephone or address change on travel cards, please place an X in the parentheses and make the desired changes on the reverse side. ()

Payment coupon. Please cut along perforation and return this portion with your payment. Make check or money order payable in U.S. dollars on a U.S. bank to Citibank. Include account number on check or money order. No cash please. Do not staple or tape your check to this coupon.

CITIBANK GOVERNMENT CARD SERVICES
CARD STATEMENT

Previous Balance	Payments And Credits	New Charges	New Balance
\$2,000.00	\$2,000.00	\$0.00	\$0.00

Invoice Date
06/23/2011
Due Date
07/18/2011

FOR CUSTOMER SERVICE CALL 1-800-200-7056 OR WRITE P.O. Box 6408, SIOUX FALLS SD 57117-6408
OUTSIDE THE U.S. AND CANADA CALL COLLECT 757-852-8078
SEND PAYMENTS TO: CITIBANK GOVERNMENT CARD SERVICES, P.O. Box 183173 COLUMBUS, OH 43218-3173

Agency Name:	Accounting Code/Cost Center	Account Number	[Redacted]
Billing Office Id:	Discretionary Code:	Agency/Org Id:	Tax Exempt#:
Single Purchase Limit:	\$0.00	Cycle Purchase Limit:	\$0.00

Sale Date	Post Date	MCC Code	Reference Number	Description	TOTAL AMOUNT
05/25/2011	05/25/2011		[Redacted]		\$2,000.00
*****TOTAL AMOUNT DUE:					\$0.00

(b) (6)

ACCOUNT SUMMARY CURRENT PERIOD		Previous Balance	Payments	Credits	Purchases and Advances	Taxes and Fees	New Balance
Purchases		\$2,000.00	- \$2,000.00				
Advances							
TOTALS		\$2,000.00	- \$2,000.00				

Memo Section	Amount Over Credit Limit:	\$0.00
	Amount Past Due:	\$0.00
	Net Total Charges:	\$0.00
	Total Cash Advances:	\$0.00
	Current Period Total:	

Approval Section

CARDHOLDERS SIGNATURE

APPROVING OFFICIAL SIGNATURE(Except Travel)



Account Number	Due Date	Total Amount Due	Enter Amount Paid
	08/17/2011	\$681.95	

Address Correspondence to:
 CITIBANK GOVERNMENT CARD
 SERVICES,
 P.O. Box 183173
 COLUMBUS, OH 43218-2173

For telephone or address change on travel cards, please place an X in the parentheses and make the desired changes on the reverse side. ()

Payment coupon: Please cut along perforation and return this portion with your payment. Make check or money order payable in U.S. dollars on a U.S. bank to Citibank. Include account number on check or money order. No cash please. Do not staple or tape your check to this coupon.

CITIBANK GOVERNMENT CARD SERVICES
CARD STATEMENT

Previous Balance	Payments And Credits	New Charges	New Balance
\$0.00		\$681.95	\$681.95

Invoice Date
07/23/2011
Due Date
08/17/2011

FOR CUSTOMER SERVICE CALL 1-800-200-7059 OR WRITE P.O. Box 8408, SIOUX FALLS SD, 57117-8408
 OUTSIDE THE U.S. AND CANADA CALL COLLECT 767-832-9076
 SEND PAYMENTS TO: CITIBANK GOVERNMENT CARD SERVICES, P.O. Box 183173 COLUMBUS, OH 43218-3173

Agency Name:	(b) (3) - P.L. 86-36	Account Number	
Accounting Code/Cost Center	(b) (6)	Agency/Org Id:	
Billing Office Id:		Tax Exempt#:	
Discretionary Code:		Cycle Purchase Limit:	\$0.00
Single Purchase Limit:	\$0.00		

Sale Date	Post Date	MCC Code	Reference Number	Description	Total Amount
07/11/2011	07/12/2011				\$10.00
07/14/2011	07/15/2011				\$39.95
07/18/2011	07/19/2011				\$20.00
07/18/2011	07/19/2011				\$30.00
07/19/2011	07/19/2011				\$300.00
07/19/2011	07/20/2011				\$282.00
*****TOTAL AMOUNT DUE:					\$681.95

(b) (6)

ACCOUNT SUMMARY CURRENT PERIOD		Previous Balance	Payments	Credits	Purchases and Advances	Taxes and Fees	New Balance
	Purchases Advances TOTALS				\$681.95		\$681.95
					\$681.95		\$681.95
Memo Section					Amount Over Credit Limit:		\$0.00
					Amount Past Due:		\$0.00
					Net Total Charges:		\$681.95
					Total Cash Advances:		\$0.00
					Current Period Total:		\$681.95
Approval Section							

CARDHOLDERS SIGNATURE

APPROVING OFFICIAL SIGNATURE(Except Travel)

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(b) (6)



[Redacted]

Account Number	Due Date	Total Amount Due	Enter Amount Paid
[Redacted]	09/17/2011	\$901.87	

[Redacted]

Address Correspondence to:
CITIBANK GOVERNMENT CARD SERVICES,
P.O. Box 183173
COLUMBUS, OH 43218-3173

For telephone or address change on travel cards, please place an X in the parentheses and make the desired changes on the reverse side. ()

Payment coupon: Please cut along perforation and return this portion with your payment. Make check or money order payable in U.S. dollars on a U.S. bank to Citibank. Include account number on check or money order. No cash please. Do not staple or tape your check to this coupon.

CITIBANK GOVERNMENT CARD SERVICES
CARD STATEMENT

Previous Balance	Payments And Credits	New Charges	New Balance
\$681.95	\$500.00	\$719.92	\$901.87

Invoice Date
08/23/2011
Due Date
09/17/2011

FOR CUSTOMER SERVICE CALL 1-800-200-7099 OR WRITE P.O. Box 6408, SIOUX FALLS SD 57117-6408
OUTSIDE THE U.S. AND CANADA CALL COLLECT 737-852-8076
SEND PAYMENTS TO: CITIBANK GOVERNMENT CARD SERVICES, P.O. Box 183173 COLUMBUS, OH 43218-3173

Agency Name:	Accounting Code/Cost Center	Account Number	[Redacted]
Billing Office Id:	Discretionary Code:	Agency/Org Id:	Tax Exempt#:
Single Purchase Limit:	\$0.00	Cycle Purchase Limit:	\$0.00

Sale Date	Post Date	MCC Code	Reference Number	Description	Total Amount
07/28/2011	07/29/2011			[Redacted]	\$42.95
07/28/2011	07/29/2011			[Redacted]	\$42.95
07/28/2011	07/29/2011			[Redacted]	\$42.95
07/28/2011	07/29/2011			[Redacted]	\$42.95
07/29/2011	08/01/2011			[Redacted]	\$27.95

ACCOUNT SUMMARY CURRENT PERIOD		Previous Balance	Payments	Credits	Purchases and Advances	Taxes and Fees	New Balance
Purchases		\$681.95	- \$500.00		\$719.92		\$901.87
Advances							
TOTALS		\$681.95	- \$500.00		\$719.92		\$901.87

Memo Section	(b) (6)	Amount Over Credit Limit:	\$0.00
		Amount Past Due:	\$181.95
		Net Total Charges:	\$719.92
		Total Cash Advances:	\$0.00
		Current Period Total:	\$719.92

Approval Section

CARDHOLDERS SIGNATURE

APPROVING OFFICIAL SIGNATURE(Except Travel)



(b) (3) - P.L. 86-36
(b) (6)

Account Number
[Redacted]

Invoice Date
08/23/2011

(b) (6)

Sale Date	Post Date	MCC Code	Reference Number	Description	Total Amount
08/05/2011	08/08/2011	[Redacted]	[Redacted]	[Redacted]	\$5.17
08/05/2011	08/08/2011	[Redacted]	[Redacted]	[Redacted]	\$425.00
08/05/2011	08/08/2011	[Redacted]	[Redacted]	[Redacted]	\$75.00
08/05/2011	08/10/2011	[Redacted]	[Redacted]	[Redacted]	\$15.00
08/18/2011	08/18/2011	[Redacted]	[Redacted]	[Redacted]	\$500.00
*****TOTAL AMOUNT DUE:					\$801.87

We did not receive your payment last month. Please pay the total balance due at once. If you have remitted payment, please disregard this notice.

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(b) (6)



[Redacted]

Account Number	Due Date	Total Amount Due	Enter Amount Paid
[Redacted]	10/18/2011	\$701.87	

[Redacted]

Address Correspondence to:
CITIBANK GOVERNMENT CARD SERVICES,
P.O. Box 183173
COLUMBUS, OH 43218-3173

For telephone or address change on travel cards, please place an X in the parentheses and make the desired changes on the reverse side. ()

Payment coupon: Please cut along perforation and return this portion with your payment. Make check or money order payable in U.S. dollars to a U.S. bank to Citibank. Include account number on check or money order. No cash please. Do not staple or tape your check to this coupon.

CITIBANK GOVERNMENT CARD SERVICES

CARD STATEMENT

Previous Balance	Payments And Credits	New Charges	New Balance
\$901.87	\$200.00	\$0.00	\$701.87

Invoice Date
09/23/2011
Due Date
10/18/2011

FOR CUSTOMER SERVICE CALL 1-800-800-7056 OR WRITE P.O. Box 6408, SIOUX FALLS SD, 57117-6408
OUTSIDE THE U.S. AND CANADA CALL COLLECT 757-862-0076
SEND PAYMENTS TO CITIBANK GOVERNMENT CARD SERVICES, P.O. Box 183173 COLUMBUS, OH 43218-3173

Agency Name:	Account Number:	[Redacted]
Accounting Code/Cost Center:	Agency/Org Id:	
Billing Office Id:	Tax Exempt#:	
Discretionary Code:	Single Purchase Limit:	\$0.00
Single Purchase Limit:	Cycle Purchase Limit:	\$0.00

Rate Date	Post Date	MCC Code	Reference Number	Description	Total Amount
09/12/2011	09/12/2011		[Redacted]		\$200.00 PY
TOTAL AMOUNT DUE:					\$701.87

We did not receive your payment last month. Please pay the total balance due at once. If you have remitted payment, please disregard this notice.

(b) (6)

ACCOUNT SUMMARY CURRENT PERIOD		Previous Balance	Payments	Credits	Purchases and Advances	Taxes and Fees	New Balance
	Purchases Advances TOTALS	\$901.87	- \$200.00				\$701.87
		\$901.87	- \$200.00				\$701.87

Memo Section	Amount Over Credit Limit:	\$0.00
	Amount Past Due:	\$701.87
	Net Total Charges:	\$0.00
	Total Cash Advances:	\$0.00
	Current Period Total:	

Approval Section

CARDHOLDERS SIGNATURE

APPROVING OFFICIAL SIGNATURE(Except Travel)

(b) (3) - P.L. 86-36
 (b) (6)



[Redacted]

Account Number	Due Date	Total Amount Due	Amount Paid
	11/17/2011	\$0.27	

[Redacted]

Address Correspondence to:
 CITIBANK GOVERNMENT CARD SERVICES.
 P.O. Box 183173
 COLUMBUS, OH 43218-3173

For telephone or address change on travel cards, please place an X in the parentheses and make the desired changes on the reverse side ()

Payment coupon: Please cut along perforation and return this portion with your payment. Make check or money order payable in U.S. dollars on a U.S. bank to Citibank. Include account number on check or money order. No cash please. Do not staple or tape your check to this coupon.

CITIBANK GOVERNMENT CARD SERVICES
CARD STATEMENT

Previous Balance	Payments and Credits	New Charges	New Balance
\$701.87	\$748.00	\$46.40	\$0.27

Invoice Date
 10/23/2011
 Due Date
 11/17/2011

FOR CUSTOMER SERVICE CALL 1-800-200-7068 OR WRITE P.O. Box 8408, SIOUX FALLS, SD, 57117-8408
 OUTSIDE THE U.S. AND CANADA CALL COLLECT 737-882-8078
 SEND PAYMENTS TO: CITIBANK GOVERNMENT CARD SERVICES, P.O. Box 183173 COLUMBUS, OH 43218-3173

Agency Name:	Account Number:	[Redacted]
Accounting Code/Cost Center:	Agency/Org Id:	
Billing Office Id:	Tax Exempt:	
Discretionary Code:	Cycle Purchase Limit:	\$0.00
Single Purchase Limit:		\$0.00

Sale Date	Post Date	MCC Code	Reference Number	Description	Total Amount
09/29/2011	09/30/2011		[Redacted]		\$46.40
10/17/2011	10/17/2011		[Redacted]		\$748.00 FY
TOTAL AMOUNT DUE:					\$0.27

(b) (6)

ACCOUNT SUMMARY CURRENT PERIOD	Previous Balance	Payments	Credits	Purchases and Advances	Taxes and Fees	New Balance
Purchases Advances TOTALS	\$701.87	- \$748.00		\$46.40		\$0.27
	\$701.87	- \$748.00		\$46.40		\$0.27

Memo Section	Amount Over Credit Limit:	\$0.00
	Amount Past Due:	\$0.00
	Net Total Charges:	\$46.40
	Total Cash Advances:	\$0.00
	Current Period Total:	\$46.40

Approval Section

CARDHOLDER'S SIGNATURE

APPROVING OFFICIAL SIGNATURE (Except Travel)

(b) (3) - P.L. 86-36
(b) (6)

Statement Detail

Cardholder Statement

Cardholder [Redacted] Account Number [Redacted]
Product Type TRAVEL - Individually Billed Statement Period 11/24/2011 - 12/23/2011 Statement Status New
Default MAC

Previous Balance \$ 1.05 Total Payments \$ 1.05 Total Amount Due \$ 241.52
Purchase \$ 241.52 Previous Disputes N/A Current Disputes N/A
Other Debits \$ 0.00 Other Credits \$ 0.00 Statement Total \$ 240.47
Tax Total \$ 6.84

post date	tran date	last alloc date time	merchant	amount	status
12/07/2011	12/07/2011		PAYMENT RECEIVED - THANK	\$ -1.05	
bill acct	ref num	tran code	orig amt	\$ 1.05	
			settlement	\$ -1.05	
			conv rate	0	
			conv date	N/A	
12/10/2011	12/18/2011			\$ 177.70	
bill acct	ref num	tran code	orig amt	\$ 177.70	
			settlement	\$ 177.70	
			conv rate	0	
			conv date	N/A	
12/21/2011	12/20/2011			\$ 45.97	
bill acct	ref num	tran code	orig amt	\$ 45.97	
			settlement	\$ 45.97	
			conv rate	0	
			conv date	N/A	
12/21/2011	12/20/2011			\$ 17.85	
bill acct	ref num	tran code	orig amt	\$ 17.85	
			settlement	\$ 17.85	
			conv rate	0	
			conv date	N/A	

(b) (6)

-End of Statement-

Statement Detail

(b) (3) - P.L. 86-36
(b) (6)

Cardholder Statement

Cardholder
Product Type
Default AAC

TRAVEL - Individually Billed

Account Number
Statement Period

12/24/2011 - 01/23/2012

Statement Status New

Previous Balance	\$ 241.52	Total Payments	\$ 241.52	Total Amount Due	\$ 2,494.37
Purchases	\$ 825.14	Previous Disputes	N/A	Current Disputes	N/A
Other Debits	\$ 1,669.23	Other Credits	\$ 0.00	Statement Total	\$ 2,252.85
				Tax Total	\$ 13.61

post date	tran date	last alloc date time	merchant	amount	status	t
12/28/2011	12/27/2011			\$ 66.24		
	bill acct			orig amt	\$ 66.24	
	ref num			settlement	\$ 66.24	
	tran code			conv rate	0	
				conv date	N/A	
12/28/2011	12/28/2011			\$ 8.06		
	bill acct			orig amt	\$ 8.06	
	ref num			settlement	\$ 8.06	
	tran code			conv rate	0	
				conv date	N/A	
12/28/2011	12/28/2011			\$ 403.00		
	bill acct			orig amt	\$ 403.00	
	ref num			settlement	\$ 403.00	
	tran code			conv rate	0	
				conv date	N/A	
12/30/2011	12/28/2011			\$ 49.06		
	bill acct			orig amt	\$ 49.06	
	ref num			settlement	\$ 49.06	
	tran code			conv rate	0	
				conv date	N/A	
12/29/2011	12/29/2011			\$ 8.06		
	bill acct			orig amt	\$ 8.06	
	ref num			settlement	\$ 8.06	
	tran code			conv rate	0	
				conv date	N/A	
12/28/2011	12/29/2011			\$ 403.00		
	bill acct			orig amt	\$ 403.00	
	ref num			settlement	\$ 403.00	
	tran code			conv rate	0	
				conv date	N/A	
12/30/2011	12/30/2011			\$ 8.06		

(b) (6)

Statement Detail

bill acct
ref num
tran code

12/30/2011 12/30/2011

bill acct
ref num
tran code

01/02/2012 12/31/2011

(b) (6)

bill acct
ref num
tran code

01/02/2012 12/31/2011

bill acct
ref num
tran code

01/02/2012 12/31/2011

bill acct
ref num
tran code

01/02/2012 12/31/2011

bill acct
ref num
tran code

01/09/2012 01/05/2012

bill acct
ref num
tran code

01/12/2012 01/10/2012

bill acct
ref num
tran code

01/16/2012 01/12/2012

bill acct

orig amt \$ 8.06
settlement \$ 8.06
conv rate 0
conv date N/A

\$ 403.00

orig amt \$ 403.00
settlement \$ 403.00
conv rate 0
conv date N/A

\$ 4.06

orig amt \$ 4.06
settlement \$ 4.06
conv rate 0
conv date N/A

\$ 4.06

orig amt \$ 4.06
settlement \$ 4.06
conv rate 0
conv date N/A

\$ 203.00

orig amt \$ 203.00
settlement \$ 203.00
conv rate 0
conv date N/A

\$ 203.00

orig amt \$ 203.00
settlement \$ 203.00
conv rate 0
conv date N/A

\$ 30.04

orig amt \$ 30.04
settlement \$ 30.04
conv rate 0
conv date N/A

\$ 25.25

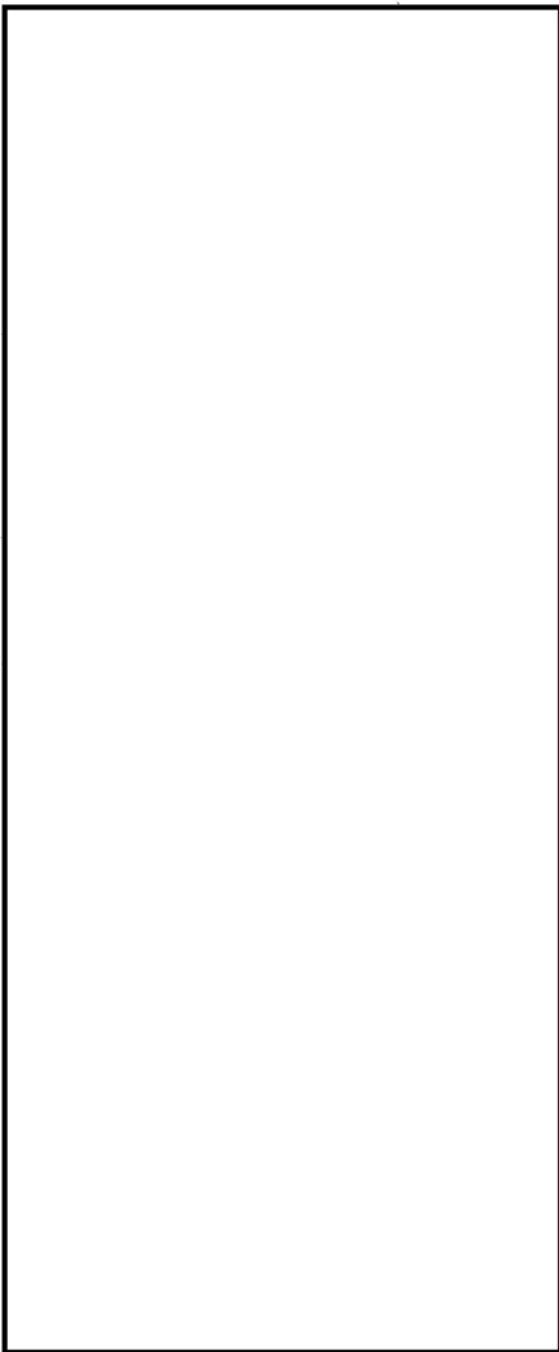
orig amt \$ 25.25
settlement \$ 25.25
conv rate 0
conv date N/A

\$ 56.42

orig amt \$ 56.42

Statement Detail

ref num
tran code



settlement \$ 56.42
conv rate 0
conv date N/A

01/18/2012 01/16/2012

\$ 24.37

bill acct
ref num
tran code

orig amt \$ 24.37
settlement \$ 24.37
conv rate 0
conv date N/A

01/19/2012 01/17/2012

\$ 45.48

bill acct
ref num
tran code

orig amt \$ 45.48
settlement \$ 45.48
conv rate 0
conv date N/A

01/19/2012 01/18/2012

\$ 526.36

bill acct
ref num
tran code

orig amt \$ 526.36
settlement \$ 526.36
conv rate 0
conv date N/A

01/20/2012 01/19/2012

\$ 1.92

bill acct
ref num
tran code

orig amt \$ 1.92
settlement \$ 1.92
conv rate 0
conv date N/A

01/20/2012 01/20/2012

\$ 0.43

bill acct
ref num
tran code

orig amt \$ 0.43
settlement \$ 0.43
conv rate 0
conv date N/A

01/20/2012 01/20/2012

\$ 21.50

bill acct
ref num
tran code

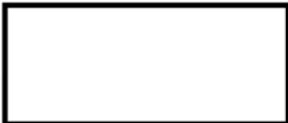
orig amt \$ 21.50
settlement \$ 21.50
conv rate 0
conv date N/A

01/23/2012 01/23/2012

PAYMENT RECEIVED -- THANK

\$ -241.52

bill acct
ref num
tran code



orig amt \$ 241.52
settlement \$ -241.52
conv rate 0
conv date N/A

--End of Statement--

(b) (6)

(b) (3) - P.L. 86-36
(b) (6)

Statement Detail

Cardholder Statement

Cardholder
Product Type
Default MAC

TRAVEL - Individually Billed

Account Number
Statement Period

01/24/2012 - 02/23/2012

Statement Status New

Previous Balance	\$ 2,494.37	Total Payments	\$ 0.00	Total Amount Due	\$ 2,681.31
Purchases	\$ 186.94	Previous Disputes	N/A	Current Disputes	N/A
Other Debits	\$ 0.00	Other Credits	\$ 0.00	Statement Total	\$ 186.94
				Tax Total	\$ 5.65

post date	tran date	last alloc date time	merchant	amount	status
01/30/2012	01/27/2012			\$ 43.31	
bill acct ref num tran code				orig amt settlement conv rate conv date	\$ 43.31 \$ 43.31 0 N/A
02/02/2012	01/31/2012			\$ 50.32	
bill acct ref num tran code				orig amt settlement conv rate conv date	\$ 50.32 \$ 50.32 0 N/A
02/02/2012	02/01/2012			\$ 18.95	
bill acct ref num tran code				orig amt settlement conv rate conv date	\$ 18.95 \$ 18.95 0 N/A
02/06/2012	02/03/2012			\$ 49.46	
bill acct ref num tran code				orig amt settlement conv rate conv date	\$ 49.46 \$ 49.46 0 N/A
02/14/2012	02/13/2012			\$ 24.90	
bill acct ref num tran code				orig amt settlement conv rate conv date	\$ 24.90 \$ 24.90 0 N/A

(b) (6)

-End of Statement-

Statement Detail

(b) (3) - P.L. 86-36
(b) (6)

Cardholder Statement

Cardholder [Redacted] Account Number [Redacted]
Product Type TRAVEL - Individually Billed Statement Period 02/24/2012 - 03/23/2012 Statement Status New
Default MAC

Previous Balance \$ 2,681.31 Total Payments \$ 2,800.00 Total Amount Due \$ 2,681.30
Purchases \$ 9.99 Previous Disputes N/A Current Disputes N/A
Other Debits \$ 2,800.00 Other Credits \$ 0.00 Statement Total \$ 9.99
Tax Total \$ 0.00

post date	tran date	last alloc date time	merchant	amount	status	t
03/05/2012	03/05/2012	[Redacted]	PAYMENT RECEIVED - THANK	\$ -300.00		
	bill acct	[Redacted]		orig amt	\$ 300.00	
	ref num	[Redacted]		settlement	\$ -300.00	
	tran code	[Redacted]		conv rate	0	
		[Redacted]		conv date	N/A	
03/09/2012	03/05/2012	[Redacted]		\$ 300.00		
	bill acct	[Redacted]		orig amt	\$ 300.00	
	ref num	[Redacted]		settlement	\$ 300.00	
	tran code	[Redacted]		conv rate	0	
		[Redacted]		conv date	N/A	
03/13/2012	03/12/2012	[Redacted]		\$ 9.99		
	bill acct	[Redacted]		orig amt	\$ 9.99	
	ref num	[Redacted]		settlement	\$ 9.99	
	tran code	[Redacted]		conv rate	0	
		[Redacted]		conv date	N/A	
03/19/2012	03/19/2012	[Redacted]	PAYMENT RECEIVED - THANK	\$ -2,300.00		
	bill acct	[Redacted]		orig amt	\$ 2,300.00	
	ref num	[Redacted]		settlement	\$ -2,300.00	
	tran code	[Redacted]	(b) (6)	conv rate	0	
		[Redacted]		conv date	N/A	
03/22/2012	03/19/2012	[Redacted]		\$ 2,300.00		
	bill acct	[Redacted]		orig amt	\$ 2,300.00	
	ref num	[Redacted]		settlement	\$ 2,300.00	
	tran code	[Redacted]		conv rate	0	
		[Redacted]		conv date	N/A	

-End of Statement-

Statement Detail

(b) (3) - P.L. 86-36
(b) (6)

Cardholder Statement

Cardholder
Product Type
Default MAC

TRAVEL - Individually Billed

Account Number
Statement Period

03/24/2012 - 04/23/2012

Statement Status New

Previous Balance	\$ 2,691.30	Total Payments	\$ 0.00	Total Amount Due	\$ 2,720.30
Purchases	\$ 0.00	Previous Disputes	N/A	Current Disputes	N/A
Other Debits	\$ 29.00	Other Credits	\$ 0.00	Statement Total	\$ 29.00
				Tax Total	\$ 0.00

post date	tran date	last alloc date time	merchant	amount	status	ty
04/09/2012	04/09/2012			\$ 29.00		
bill acct			orig amt	\$ 29.00		
ref num			settlement	\$ 29.00		
tran code			conv rate	0		
			conv date	N/A		

--End of Statement--

(b) (6)

(b) (3) - P.L. 86-36
(b) (6)

Cardholder Statement

Cardholder [Redacted] **Account Number** [Redacted] **Statement Status** New
Product Type TRAVEL - Individually Billed **Statement Period** 04/24/2012 - 05/23/2012
Default MAC

Previous Balance	\$ 2,720.30	Total Payments	\$ 504.72	Total Amount Due	\$ 2,289.58
Purchases	\$ 0.00	Previous Disputes	N/A	Current Disputes	N/A
Other Debits	\$ 74.00	Other Credits	\$ 0.00	Statement Total	\$ -430.72
				Tax Total	\$ 0.00

post date	tran date	last alloc date time	merchant	amount	status	t
05/08/2012	05/08/2012		[Redacted]	\$ 29.00		
	bill acct	[Redacted]	orig amt	\$ 29.00		
	ref num	[Redacted]	settlement	\$ 29.00		
	tran code	[Redacted]	conv rate	0		
		[Redacted]	conv date	N/A		
05/15/2012	05/15/2012		PAYMENT RECEIVED -- THANK	\$ -504.72		
	bill acct	[Redacted]	orig amt	\$ 504.72		
	ref num	[Redacted]	settlement	\$ -504.72		
	tran code	[Redacted]	conv rate	0		
		[Redacted]	conv date	N/A		
05/16/2012	05/16/2012		[Redacted]	\$ 45.00		
	bill acct	[Redacted]	orig amt	\$ 45.00		
	ref num	[Redacted]	settlement	\$ 45.00		
	tran code	[Redacted]	conv rate	0		
		[Redacted]	conv date	N/A		

-End of Statement-

Statement Detail

(b) (3) - P.L. 86-36
(b) (6)

Cardholder Statement

Cardholder
Product Type
Default MAC

TRAVEL - Individually Billed

Account Number
Statement Period

05/24/2012 - 06/22/2012

Statement Status New

Previous Balance	\$ 2,289.58	Total Payments	\$ 4,579.16	Total Amount Due	\$ 2,348.55
Purchases	\$ 29.97	Previous Disputes	N/A	Current Disputes	N/A
Other Debits	\$ 4,608.16	Other Credits	\$ 0.00	Statement Total	\$ 58.97
				Tax Total	\$ 0.00

post date	tran date	last alloc date	time	merchant	amount	status	c
05/24/2012	05/24/2012			PAYMENT RECEIVED -- THANK	\$ -2,289.58		
bill acct				orig amt	\$ 2,289.58		
ref num				settlement	\$ -2,289.58		
tran code				conv rate	0		
				conv date	N/A		
05/25/2012	05/24/2012			PAYMENT RECEIVED -- THANK	\$ -2,289.58		
bill acct				orig amt	\$ 2,289.58		
ref num				settlement	\$ -2,289.58		
tran code				conv rate	0		
				conv date	N/A		
05/29/2012	05/24/2012				\$ 2,289.58		
bill acct				orig amt	\$ 2,289.58		
ref num				settlement	\$ 2,289.58		
tran code				conv rate	0		
				conv date	N/A		
05/31/2012	05/24/2012				\$ 2,289.58		
bill acct				orig amt	\$ 2,289.58		
ref num				settlement	\$ 2,289.58		
tran code				conv rate	0		
				conv date	N/A		
05/29/2012	05/28/2012				\$ 9.99		
bill acct				orig amt	\$ 9.99		
ref num				settlement	\$ 9.99		
tran code				conv rate	0		
				conv date	N/A		
05/29/2012	05/28/2012				\$ 9.99		
bill acct				orig amt	\$ 9.99		
ref num				settlement	\$ 9.99		
tran code				conv rate	0		
				conv date	N/A		
05/29/2012	05/29/2012				\$ 29.00		

Statement Detail

(b) (6)

bill acct
ref num
tran code

[Redacted]

orig amt \$ 29.00
settlement \$ 29.00
conv rate 0
conv date N/A

06/12/2012 06/11/2012

bill acct
ref num
tran code

[Redacted]

\$ 9.99

orig amt \$ 9.99
settlement \$ 9.99
conv rate 0
conv date N/A

--End of Statement--

(b) (3) - P.L. 86-36
(b) (6)

Cardholder Statement

Cardholder Product Type Default MAC: TRAVEL - Individually Billed
Account Number Statement Period: 06/23/2012 - 07/23/2012
Statement Status: New

Previous Balance	\$ 2,348.55	Total Payments	\$ 2,350.00	Total Amount Due	\$ 2,037.54
Purchases	\$ 9.99	Previous Disputes	N/A	Current Disputes	N/A
Other Debits	\$ 2,029.00	Other Credits	\$ 0.00	Statement Total	\$ -311.01
				Tax Total	\$ 0.00

post date	tran date	last alloc date time	merchant	amount	status	t
06/27/2012	06/27/2012		PAYMENT RECEIVED - THANK	\$ -350.00		
bill acct	ref num	tran code	(b) (6)	orig amt	\$ 350.00	
				settlement	\$ -350.00	
				conv rate	0	
				conv date	N/A	
07/11/2012	07/10/2012			\$ 9.99		
bill acct	ref num	tran code		orig amt	\$ 9.99	
				settlement	\$ 9.99	
				conv rate	0	
				conv date	N/A	
07/17/2012	07/17/2012		PAYMENT RECEIVED - THANK	\$ -2,000.00		
bill acct	ref num	tran code		orig amt	\$ 2,000.00	
				settlement	\$ -2,000.00	
				conv rate	0	
				conv date	N/A	
07/23/2012	07/17/2012			\$ 2,000.00		
bill acct	ref num	tran code		orig amt	\$ 2,000.00	
				settlement	\$ 2,000.00	
				conv rate	0	
				conv date	N/A	
07/23/2012	07/23/2012			\$ 29.00		
bill acct	ref num	tran code		orig amt	\$ 29.00	
				settlement	\$ 29.00	
				conv rate	0	
				conv date	N/A	

--End of Statement--

(b) (3) - P.L. 86-36
(b) (6)

Cardholder Statement

Cardholder	[Redacted]	Account Number	[Redacted]	Statement Status	New
Product Type	TRAVEL - Individually Billed	Statement Period	07/24/2012 - 08/23/2012		
Default MAC					

Previous Balance	\$ 2,037.54	Total Payments	\$ 2,037.54	Total Amount Due	\$ 0.00
Purchases	\$ 0.00	Previous Disputes	\$ N/A	Current Disputes	\$ N/A
Other Debits	\$ 0.00	Other Credits	\$ 0.00	Statement Total	\$ -2,037.54
				Tax Total	\$ 0.00

post date	tran date	last alloc date time	merchant	amount	status	t
07/25/2012	07/25/2012		PAYMENT RECEIVED - THANK	\$ -1,800.00		
bill acct	[Redacted]		orig amt	\$ 1,800.00		
ref num	[Redacted]		settlement	\$ -1,800.00		
tran code	[Redacted]		conv rate	0		
			conv date	N/A		
07/25/2012	07/25/2012		PAYMENT RECEIVED - THANK	\$ -237.54		
bill acct	[Redacted]		orig amt	\$ 237.54		
ref num	[Redacted]		settlement	\$ -237.54		
tran code	[Redacted]		conv rate	0		
			conv date	N/A		

--End of Statement--

~~UNCLASSIFIED//FOR OFFICIAL USE ONLY~~

IV-12-0090

APPENDIX C

(U) Delinquency Notices

~~UNCLASSIFIED//FOR OFFICIAL USE ONLY~~

From:
Sent:
To:
Subject:

Thursday, February 28, 2013 10:50 AM

(U)

Classification
UNCLASSIFIED//FO
NO OFFICIAL USE
ONLY

(b) (3) - P.L. 86-36
(b) (6)

To:
Cc:
Supervisor:
Time Sent:
Subject:
Body:

03/15/2012 02:58:56 PM

****URGENT** GTCC 45 Days Delinquent **URGENT****

Hello

Upon reviewing the Citi government travel charge card (GTCC) accounts this month, we found that you are currently over 45 days past due in paying your government issued travel charge card account.

At midnight on 23rd of March 2012 Citi will have no choice other than to automatically suspend ATM and charging privileges until your delinquent balance is paid in full. Please contact me @ DL

Travelcard ASAP if you will be in a travel status on or around this date. We will then, on your behalf, be able to communicate with Citi to request that your charging privileges remain active until your TDY has been completed. If you have not filed your TDY expense report/voucher, please do so now. To expedite the processing of your expense report/voucher, you may scan/e-mail it directly to Travel Entitlements at their e-mail alias of NSA TDY.

Be reminded that in accordance with Agency GTCC policy (Corporate TravelGram 01-2008, dated May 2008,

(b) (3) - P.L. 86-36

all charges on your GTCC are due upon receipt of your Citi statement. Should any charges on your statement appear to be in question, please notify DL Travelcard immediately so these charges can be discussed, investigated, and/or resolved.

If you have mailed your payment, please promptly provide us with a check number, amount paid, and date mailed. If you made an on-line payment, please provide the payment amount and date of payment.

Thanks,

Accounting Analyst

769-7100 (s)

[Redacted]

From: [Redacted]
Sent: Monday, April 29, 2013 8:37 AM
To: [Redacted]
Subject: RE: (U) RE: **Action Required** Account 90 Days Past Due

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-----Original Message-----

From: [Redacted]
Sent: Friday, May 11, 2012 2:39 PM
To: [Redacted]
Cc: [Redacted]
Subject: **Action Required** Account 90 Days Past Due

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THIS IS AN OFFICIALLY WORDED DUE PROCESS NOTIFICATION SENT IN ACCORDANCE WITH DOD FINANCIAL MANAGEMENT REGULATIONS.

[Redacted]

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(b) (6)

As of 05/11/2012, a review of the Citi government travel charge card (GTCC) database indicates that you are now over 90-days delinquent in the payment of your GTCC.

Total amount due is \$\$2,749.30.

Please be advised that your GTCC account will be cancelled on 05/17/2012(120-days delinquent) and any outstanding balance which is not formally disputed will be submitted to the Finance and Account Office for involuntary salary offset. The GTCC and Agency travel card policy (Corporate TravelGram 01-2008, dated May 2008, [Redacted])

[Redacted] requires all undisputed outstanding charges to be paid by the specified due date as stated on the Citi monthly statement.

Citi will automatically cancel any GTCC account that reaches the 120-day delinquency mark, with no reinstatement privileges. You are reminded that if you are required to travel in the future you will not receive a cash advance for the benefit of government transportation rates. All costs will be borne by you, the traveler, until you are reimbursed by the agency for which you traveled. Reimbursement by the Agency will not occur until you have submitted an expense report/voucher and the applicable receipts.

Non-compliance, or failure to adhere to the guidelines for the GTCC, can result in disciplinary action in accordance with PMM 30-2, Chapter 366, Section 3.1D Government Credit/Charge Cards [Redacted]. To resolve this delinquency, you may conduct a phone payment by calling the 800 number on the back of your Citi GTCC. NOTE: You MUST contact Citi from a home phone, DO NOT use a government phone exchange to contact Citi.

If you are financially unable to make a full payment, and wish to enter into a written agreement with Citi to make voluntary monthly payments and avoid involuntary salary offset, immediately contact the 800 number on the back of your GTCC to make the necessary arrangements. (DO NOT CONTACT CITI FROM AN AGENCY PHONE EXCHANGE.)

In accordance with the Travel and Transportation Reform Act of 1998, Public Law 105-264, 19 October 1998, and 41 C.F.R. Parts 301-54, and 301-76, and the Department of Defense Financial Management Regulation, Volume 8, paragraph 080602 (civilian employees), your outstanding balance will be sent to the Finance and Accounting Office for involuntary salary offset if your GTCC account is not paid in full within 30 days from the date of this notification. Deductions not to exceed 15% of your disposable net pay (gross pay less deductions for federal, state and local taxes, Medicare and/or OASDI, retirement, TSP, health insurance and basic life insurance) will be initiated until your balance has been paid in full. If you have paid this debt in full, or believe the debt is invalid, please send an e-mail to our e-mail alias of: [redacted] You have the right to inspect and request copies of records related to your debt. You also have the right to request, in writing, a hearing concerning the amount and validity of the debt or the amount of involuntary deductions. To request a hearing, you must complete the Petition for Hearing Request form, which can be found at:

Thank You

[redacted]
.....
[redacted]
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~~UNCLASSIFIED//FOR OFFICIAL USE ONLY~~

IV-12-0090

APPENDIX D

~~(U//FOUO)~~ NSA/CSS Corporate Travel Gram Issue 01-2008
(Revision to Issue 01-2008) July 2009,
Department of Defense Government Travel Card Procedures

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Issue 01-2008
 (Revision to Issue 01-2008)
 July 2009

(U) DEPARTMENT OF DEFENSE GOVERNMENT TRAVEL CARD PROCEDURES

(U) This Corporate TravelGram details the procedures for mandatory use of the Government travel charge card (travel card) under the "Travel and Transportation Reform Act of 1998" (TTRA), Public Law 105-264.

I. (U) PURPOSE:

(U//~~FOUO~~) The purpose of this Travel Gram is to inform National Security Agency employees (civilian and military on 4000 billets) of the basic NSA/CSS policy and procedures for using a government travel card, while traveling internationally (OCONUS) and in the continental United States (CONUS). Effective 1 October 1995, the individual Government travel card program was instituted agency wide for the payment of official travel related expenses. NSA's employees should use the travel card for all official travel expenses unless those expenses are otherwise exempted. (See section VIII of this Travel Gram)

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(U//~~FOUO~~) Employees, [REDACTED],
 [REDACTED] will be exempt from using the travel card.
 Employees must consult with the [REDACTED] prior to making travel arrangements.

II. (U) PROCEDURES FOR OBTAINING A TRAVEL CARD:

(U//~~FOUO~~) The Citibank charge card application form may be printed from, [go travelcard](#). The following sections must be completed: (Email address is not needed)

1. Name
2. Address
3. Social Security Number
4. Date of Birth
5. Cardholder's signature
6. Date
7. Credit Report Authorization
8. Supervisor's signature
9. Date

The remaining sections will be completed for you by the Agency Program Coordinator (APC).

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(U//~~FOUO~~) Military personnel must complete and submit a direct deposit form and a military point-of-contact sheet (POC) with their Citibank charge card application. All of the forms can be accessed on the [redacted] websites.

(U//~~FOUO~~) Applicants must read, initial, and sign the Statement of Understanding Government Travel Card Program form (SOU). A supervisor's approval signature is required on the SOU form for both civilian and military personnel.

(U//~~FOUO~~) A listing of all APCs and additional points-of-contact for the Citibank travel card program can be found by typing "Go Travel" or "Go Travelcard" in the intranet browser.

(U//~~FOUO~~) Applicants will receive their travel cards usually within 7-10 business days. The travel cards will be mailed to the applicant's home addresses. If a travel card is not received within the 7-10 period the APC should be contacted.

(U//~~FOUO~~) EXPEDITED CARD PROCESSING: If an employee is required to perform a mission critical TDY and does not have a valid travel card, they must have their Request for Travel Authorization (RTA) processed through [redacted] prior to submitting the completed travel charge card application to the APC. Upon receipt of the application, the APC will initiate action with Citibank to expedite delivery of a travel card. There is an additional processing fee for the expedited card service which is reimbursable by the funding organization. Please note that someone must be available to sign for the card at the mailing or home address, or the card may be sent to either of the travel offices for pick-up.

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III. (U) PROPER USE OF THE CITIBANK TRAVEL CARD:

(U//~~FOUO~~) Authorized use of the travel card is reserved for purchases related to and made during official Government travel only and which will be reimbursed using travel funds. Expenses to support travel mission should be not charged using this card. The travel card should be used for purchases such as the following:

- air travel
- rail travel
- lodging
- transportation services
- conference fees
- auto rental
- fuel
- ATM access
- service fee/agent fee/transaction fees

The travel card may be used at food service establishments. Use of the card for meals & incidentals expenses is not mandatory.

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UNCLASSIFIED//~~FOR OFFICIAL USE ONLY~~**(U) Permanent Change of Station (PCS)**

~~(U//FOUO)~~ Use of the travel card is required for purchases related to and made during official Government travel for a Permanent Change of Station. Examples of these expenses would include lodging rental cars, airfare and taxis. The card may also be used for meals.

~~(U//FOUO)~~ The travel card should be used for purchases relating to the following entitlements:

- Temporary Quarters Subsistence Expense (TQSE)
- House Hunting Trip (HHT), including Airfare.
- Mileage and Per Diem (MIPD), including Airfare
- Temporary Quarters Subsistence Allowance (TQSA)
- Foreign Transfer Allowance (FTA)

~~(U//FOUO)~~ The Travel Voucher Summary, Form DD 1351-2, should be submitted within five days of the completion of each entitlement. All necessary receipts should be attached to the signed travel voucher summary. Both the employee's signature and the Approving Official's (AO) signature are necessary on this form.

IV. (U) When the Employee Requires Cash:

~~(U//FOUO)~~ Employees in preparation for official travel may need to withdraw cash from an ATM for incidental expenses, or in instances when a vendor will not accept the government travel card. Cardholders will be provided personal identification numbers (PIN), which will allow access to ATMs. The employee can always "customize" their pin number. The use of a travel card for cash withdrawals is limited to \$1,000 during a seven-day period. In circumstances where the cash limit is insufficient, the employee should contact the Agency Card Program Manager (CPM). Employees will be reimbursed for any fees associated with ATM withdrawals made using this card. Reimbursement of the ATM charge is only authorized for withdrawals made in conjunction with official travel. ATM withdrawals should not be made more than 3 working days prior to the start of the travel.

V. (U) EMPLOYEE REIMBURSEMENT:

~~(U//FOUO)~~ DoD has mandated that all civilian employees and Military members must designate the portion of their reimbursement for charges made to the official travel card, be sent to Citibank to liquidate their bill. This amount should be recorded on the top of the RTA under the Split Disbursing area. If the outstanding balance is unknown, the employee may contact their APC for the correct amount. If an amount is not indicated on the RTA, the following expenses will automatically be split disbursed to Citibank: air/train fare and service fee; lodging and lodging tax, rental car and conference fee. The split disbursing process is not available for sensitive TDYs. If the total balance of the bill

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is not paid through split disbursement, the traveler is responsible for any remaining balance owed to the Bank.

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(U//~~FOUO~~) [redacted] has been exempted from the mandate to split disburse funds. This option is not available for [redacted] reimbursements.

(U//~~FOUO~~) All TDY travel claims must be submitted to [redacted] within five (5) working days after the completion of each trip. Failure to submit a claim does not excuse the employee from paying the Citibank by the due date posted on the billing statement.

(U//~~FOUO~~) All PCS travel claims must be submitted to [redacted] within five (5) working days after the completion of the entitlement. Failure to submit a claim does not excuse the employee from paying the Citibank by the due date posted on the billing statement.

(U//~~FOUO~~) During long-term TDYs, those in excess of 45 days, the employee is required to submit a claim for each 30-day period. The claim must be submitted within 5 days after the end of each 30-day period. While in an extended TDY status, it is important that employees ensure their travel card bill is paid by the due date specified on the Citibank billing statement. To help facilitate this, employees are required to contact their APC or Field Site POC prior to departing on the extended TDY.

(U//~~FOUO~~) Employees shall be reimbursed no later than 30 days after submitting to the Travel Entitlements Branch, a properly completed claim for reimbursement.

(U//~~FOUO~~) Each claim must include: RTA with AO's signature and employee's signature, as well as paid receipts for lodging, transportation tickets, rental car, conference fees and any item \$75.00 or more. Claims must be submitted to [redacted] the [redacted]

(U//~~FOUO~~) If reimbursement takes longer than 30 days, the Government may be required to pay the employee interest. Interest is payable, using the "Prompt Payment Act" interest rate, beginning on the 31st day after the submission of a properly filed travel claim and ending on the date that the payment is disbursed by the Government. The only exception to the requirement for this payment is when the payment would be less than \$1.00. In addition, the employee shall be paid an amount equal to any late payment charge that the travel card contractor would have been able to charge had the employee not paid the bill.

VI. (U) LATE PAYMENT/DELINQUENT ACCOUNTS:

(U//~~FOUO~~) Payments are due in full by the due date specified on the Citibank billing statement regardless of whether or not the employee has received reimbursement.

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(U//~~FOUO~~) Employees will incur a \$29.00 fee for payments returned due to insufficient funds. This return payment fee is not reimbursable.

(U//~~FOUO~~) **MILITARY DELINQUENT ACCOUNTS:** In accordance with the Memorandum of Agreement (MOA) between the Military Commands and the National Security Agency/Central Security Service, military accounts which are 45 days delinquent will be reported directly to their parent military command.

(U) **CIVILIAN DELINQUENCY CYCLES:**

(U//~~FOUO~~) **45 days Delinquency –** After 45 days of delinquency, the APC will send notification to the employee and their immediate supervisor stating that unless outstanding charges are paid in full, their travel card will be suspended on the 61st day of delinquency. On the 61st day of delinquency, the Citibank will automatically suspend ATM and travel card privileges.

(U//~~FOUO~~) **75 days Delinquency –** After 75 days of delinquency, the APC will send notification to the employee, their immediate supervisor and the organization's Chief of Staff stating that travel card privileges remain suspended and the outstanding balance must be paid in full to avoid further action. In addition, a \$29.00 late fee, which is not reimbursable, will be applied to the employee's account.

(U//~~FOUO~~) **90 days Delinquency –** After 90 days of delinquency, the Individually Billed Account Manager (IBA) will notify the organization's Chief of Staff and the Employee Relations (ER) Office for appropriate disciplinary action. The IBA will send a Due Process Letter to the employee allowing 30 days to make full payment of the outstanding balance (copies will be sent to the organization's Chief of Staff and ER).

(U//~~FOUO~~) **Salary Offset –** If the employee's payment is not made in full within 30 days of the date of the Due Process Letter, then the Salary Offset process will be initiated in accordance with the DoD and BOA established policy. Payments of 15% of the employee's net pay will be deducted from their bi-weekly federal salary to satisfy account balances that are not in dispute.

(U//~~FOUO~~) **120 days Delinquency -** On the 120th day of delinquency, the Citibank will automatically cancel the employee's account. Once the account is cancelled, the Citibank will not reinstate the travel card for any reason.

VII. (U) MISUSE OF THE TRAVEL CARD:

(U//~~FOUO~~) Travel cards should be used only for reimbursable expenses associated with official travel which will be reimbursed on the RTA or DD1351-2.

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(U//~~FOUO~~) Military Misuse: In accordance with the Memorandum of Agreement (MOA) between the Military Commands and the National Security Agency/Central Security Service, when misuse of the travel card is suspected Military accounts will be deactivated and a notice of deactivation will be sent to the respective parent command,

(U//~~FOUO~~) Civilian Misuse: If misuse of the travel card is suspected, the IBA will send an email to the employee and their immediate supervisor questioning the expenses on the traveler's account. Depending on the response provided and the seriousness of the misuse, the travel card may be deactivated to prevent further misuse. In addition, a formal case will be forwarded to Employee Relations (ER) for disciplinary action.

(U//~~FOUO~~) Supervisors shall not tolerate misuse of the travel card and cardholders who misuse their travel cards shall be subject to appropriate administrative or disciplinary action. Possible actions range from written reprimand to removal.

VIII. (U) EXCEPTIONS/EXEMPTIONS TO TRAVEL CARD USE:

(U//~~FOUO~~) Military or DoD civilian personnel whose use of the travel card, due to operational, security or other requirements of a mission, would pose a threat to national security, endanger the life or physical safety of travelers or others, or would compromise a law enforcement activity. Refer to Section 1 (PURPOSE, paragraph 2).

(U//~~FOUO~~) Military or DoD civilian personnel traveling to or in a foreign country where the political, financial, or communications infrastructure does not support the use of a travel card. Consult the for guidance.

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(U//~~FOUO~~) Military or DoD civilian personnel that are determined to be infrequent travelers. An infrequent traveler is one who travels two or less times per year. While DoD has exempted infrequent travelers from the mandate to use the official charge card, NSA offers the card to all employees and will offer no special accommodations to those infrequent travelers who elect to not apply for the card.

(U//~~FOUO~~) Individuals employed or appointed on a temporary or intermittent basis upon a determination by the individual's supervisor or other appropriate official that the duration of the employment or appointment or other circumstances pertaining to such employment or appointment does not justify issuance of a travel card to such individual.

(U//~~FOUO~~) There are two exceptions when personal charges may appear on the official travel charge card. These are:

- a. personal lodging or rental car charges incurred in conjunction with official travel charges when travelers are extending their official time at the hotel or use of a rental vehicle to include personal (leave) time
- b. when travelers are charging expenses incidental to the hotel bill (exercise room fees, movie rentals, personal phone calls or beverages)

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While these personal charges are not reimbursable, travelers will not be expected to use a personal charge card since these charges are incidental to use of the hotel /rental car. If the traveler elects to change hotels or rental vehicles during the personal time, the official charge card should not be used for these expenses.

(U//~~FOUO~~) FRIENDLY REMINDER: If an employee has any questions/concerns about their account, they should contact the APC. It is very important that the APC be notified of any address changes, name changes or to report a lost or stolen card. If an employee receives any inquiry for data, appearing to be from the Bank, either on the phone or through e-mail, the employee should not respond to it. The Citibank will not attempt to communicate via these modes. When this type of correspondence is received it should be reported to the APC.

(U//~~FOUO~~) EFFECTIVE DATE: This Corporate TravelGram is effective immediately and rescinds Corporate Travel Gram 01-2003. If you need additional information, please contact the Travel Card Program Office, 968-4027s or

NOTE: (U) The contents of this Corporate Travel Gram have been coordinated with the Office of General Counsel.

(b) (3) - P.L. 86-36

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(b) (3) - P.L. 86-36
(b) (6)

APPENDIX E

(U) E-mail from [redacted] to [redacted]
dated 18 May 2012

(b) (3) - P.L. 86-36

(b) (3) - P.L. 86-36
(b) (6)

From:
Sent:
To:
Cc:
Subject:

Friday, May 18, 2012 8:53 AM

(U) Security Matter...

Classification: UNCLASSIFIED//~~FOR OFFICIAL USE ONLY~~

Good morning [redacted] et al.

(b) (3) - P.L. 86-36

I know it has been a great matter of concern for me and those involved in this situation. I am so deeply sorry for the problem that I've caused and mis-using the Gov't Credit Card. I am also very sorry for the response I gave my supervisor [redacted] I feel really saddened, troubled, and embarrassed concerning the GTCC and that's why I wasn't truthful with him when it was brought to my attention. I am so sorry for this and what I've done. When [redacted] also talked to me concerning the Security Financial form due May 15th I had only remembered May 30th from the email. I spoke with [redacted] just yesterday morning and I began to re-do my SecFin form. I then realized that I had started it back in February of 2012 when I saw the icon on my desktop. Upon opening it, I had only a few minor charges to add to it. I related this to [redacted] to let him know that I wasn't ignoring it at all, but because of my medical situations and everything surrounding that I had forgotten about it.

Further in my conversation with [redacted] I reminded him of my absence being on Med. Leave last year when my SecFin forms were due and that I could not have met the due date, he did respond by saying he remembered, so it wasn't a pattern at all concerning my security obligation.

I realize that this still does not justify nor provide an excuse for my actions. In all my years here, I never had to deal with any of these kinds of situations before because I treasure deeply the privilege and honor and respect of working for this Agency. I am so deeply sorry that I mis-used the GTCC and I have taken steps to rectify this matter of significant importance in full. I also am deeply sorrowful that I was not truthful in response to this matter, and to all involved, I ask your forgiveness

I am sending this message because I do care and appreciate my portion of service to NSA, and I earnestly and thoroughly believe in the purpose, mission and integrity it upholds. The bottom line is, I love serving at NSA and I earnestly would like the opportunity to continue doing so. Please forgive me for the wrong that I've caused and I do take responsibility for my actions.

With all sincerity,

[redacted signature]

[redacted address]

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(b) (3) - P.L. 86-36
(b) (6)

APPENDIX F

(U) E-mail from to the OIG,
dated 13 December 2012

~~UNCLASSIFIED//FOR OFFICIAL USE ONLY~~

From:
Sent:
To:
Cc:
Subject:
Attachments:

[Redacted]
Thursday, December 13, 2012 10:43 AM
[Redacted]
[Redacted]
FW: Re: (U) Termination of Bankruptcy Garnishment for [Redacted]
[Redacted].pdf

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(b) (3) - P.L. 86-36
(b) (6)

Okay [Redacted] here is the email w/attachment, Thanks.

[Redacted] I know I said this, but I am so sorry, and I apologize deeply for my lack of wisdom in misusing the Government credit card. I do take full responsibility for my actions which will never happen again. Although I value, with high esteem, the trust that NSA has put in me as an employee, I realize that I waived on my responsibility. I have taken the careful steps through counsel and education to ensure that this incident will never take place again. I try my best to walk and live as a person of integrity and that's why this hurts so much. It is a privilege and an honor to serve the Agency in the fulfillment of its mission. With my whole heart I do look forward to serving many more years.

Thanks,

[Redacted]

[Redacted]
[Redacted]

(b) (3) - P.L. 86-36

DropBox [Redacted]

"It's not what goes into a man that defiles him,..but what comes out of his mouth!"

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IV-12-0090

APPENDIX G

(U) Response to Tentative Conclusions

~~UNCLASSIFIED//FOR OFFICIAL USE ONLY~~

[Redacted]

From: [Redacted]
Sent: Friday, April 05, 2013 8:25 AM
To: [Redacted]
Cc: [Redacted]
Subject: RE: (U) [Redacted] comment on the conclusion of OIG Investigation

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Good morning [Redacted]

As I shared before, I am so deeply saddened and apologize for the wrong decision I made previously to use the Government travel credit card (GTCC). I know I went through some very difficult financial and emotional times, but nevertheless, I was still wrong. I am so sorry for my dishonesty. I felt ashamed and embarrassed, in which I was deserving of. In repaying my debt almost a year ago, I realized regardless of my circumstances there was still no justification for my actions. Since that time I have learned so much and it has had a tremendous effect on me and my family. Through lots of prayer, Credit Counseling, and Financial Management courses, I've been able to turn things around for good.

I came to this agency with a grateful heart because of the opportunity God gave me to help serve and support NSA's effortless and dedicated mission and that's why this incident hurts. I've learned though that there are several support groups and employee programs here at the agency to help with the difficult times and to help employees and their families regain their footing to move forward. Again, I am sorry and I apologize for my offence. With all sincerity, please, I do covet the opportunity to continue to serve faithfully in the mission of NSA. Thank you so very much.

Respectfully,

[Redacted]
(b) (3) - P.L. 86-36
(b) (6)

[Redacted]

[Redacted]

(b) (3) - P.L. 86-36

DropBox [Redacted]

"It's not what goes into a man that defiles him,..but what comes out of his mouth"!

[Redacted]

From: [Redacted]
Sent: Monday, April 08, 2013 9:54 AM
To: [Redacted]
Cc: [Redacted]
Subject: RE: (U) [Redacted] comment on the conclusion of OIG Investigation

Classification: UNCLASSIFIED//~~FOR OFFICIAL USE ONLY~~

(b) (3) - P.L. 86-36
(b) (6)

Good morning [Redacted]

As an additional note, as explained before, during my financial difficulties I struggled with mortgage payments, medical bills, and other utility bills. The events that seemed to open the door to our struggle is when [Redacted] During the duration [Redacted] things became very difficult financially, as well as emotionally. [Redacted] and the care she needed was constant and tiresome because there was no one else able to care for her. Soon after, [Redacted] which put a strain on our own and before we knew it we were behind the eight ball, if you will. I became overwhelmed from calls and letters threatening to foreclose, medical offices turning us over to collection agencies, and utility offices like BG&E threatening to turn off our power.

(b) (6)

[Redacted] did eventually pass away which was a very difficult time especially for [Redacted] I am sorry to say, but these situations and circumstances were very real and it put a great strain on our household. I do apologize to NSA because I made a wrong decision to use the GTCC to help keep us above water when there were only days before the courts would foreclose on our house, and attorney threats to take us to court for failing to make payments on other bills. Although there is no balance I owe, I thoroughly regret that decision.

I am glad that things are much much better financially and emotionally and because of prayer, counseling programs and courses we were able to pay off a lot of bills and refinance our current mortgage. I want NSA to know that this was a major/exhaustive lesson in my life and that I will use it as a quality step to strengthen my radical pursuit to fulfill its' mission.

[Redacted]

[Redacted]

(b) (3) - P.L. 86-36

DropBox [Redacted]

"It's not what goes into a man that defiles him,..but what comes out of his mouth"!