

OSC File No. DI-23-000271

Whistleblower (WB#1) Response to Agency Report

Introduction

WB #1 Following numerous and unsuccessful attempts to resolve issues internally with ATF's oversight of the revocation of a Federal Firearms Licensee (FFL #1), and the issuance of a new FFL to (Applicant #1) filed a whistleblower complaint with the United States Office of Special Counsel (OSC) Disclosure Unit. Notably Applicant #1 was an employee and Responsible Person (RP) on the existing FFL for revoked FFL#1 for years yet was still issued an FFL by ATF.

The initial complaint, which was filed in January 2023, involved allegations of gross mismanagement, an abuse of authority and a substantial and specific danger to public safety within the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Boston Field Division Industry Operations Office. Specifically, the complaint involved ATF's handling or mishandling of the Revocation of FFL #1.

In March 2023 WB#1 contacted OSC again to discuss amending the complaint to include additional allegations of gross mismanagement, an abuse of authority and a substantial and specific danger to public safety including the issuance of a new FFL to Applicant #1.

Also in March 2023, ATF IAD contacted WB #1 through the OSC with clarification questions regarding allegations of gross mismanagement, an abuse of authority and a substantial and specific danger to public safety. WB #1 provided answers to these questions to IAD through the OSC as well as additional information regarding the allegations of wrongdoing regarding the issuance of a new FFL to Applicant #1.

Notably ATF OCC in its response makes little to no mention of the additional allegations of wrongdoing associated with the issuance of the FFL to Applicant #1.

The OSC disclosure unit should find the ATF's agency response not reasonable for this issue alone and remand it back to ATF or the Department of Justice, Office of Inspector General as to how this part of the complaint was not addressed.

Background

The OSC after receiving the initial complaint determined there was a substantial likelihood of wrongdoing and referred the matter to the Attorney General, United States Department of Justice (DOJ), for further investigation. OSC in the referral also asked the Attorney General to investigate any additional, related allegations of wrongdoing during the investigation of the inquiry.

DOJ after receiving the complaint referred the matter back to ATF for further investigation. ATF in turn assigned the investigation into the complaints to their Internal Affairs Division (IAD). However, of note, ATF issued a response to OSC through their Office of Chief Counsel (OCC) rather than providing OSC the IAD Report of Investigation.

Based on the missing allegations of wrongdoing associated with the issuance of the FFL to Applicant #1 OSC should obtain a copy of the IAD Report to see why the information was not included in the ATF OCC response.

The ATF's response does a disservice to the agency, the Department of Justice, and the American Public. The ATF in its response, omitted material information, misstated material facts, and ignored substantial aspects of the IAD investigation, including the additional allegations of wrongdoing that were provided to IAD by WB#1 after obtaining clarification questions from IAD through the OSC.

A classic "Straw Man" Argument and Defense by OCC

OCC in its response under I. stated in part:

"Based on the facts found by ATF IAD, there is no basis for finding ATF failed to revoke FFL#1's federal firearms license despite its failure to comply with a non-prosecution agreement." OCC in its response further states under section IV "ATF did revoke all four licenses held by FFL#1."

OCC in its response ignores key facts that are pertinent to the discussion of ATF's mishandling of the revocation of FFL #1. Notably, at the time WB #1 made the initial complaint to OSC, which was in January 2023, FFL #1 was still in business and operating as usual. ATF and OCC conveniently delayed their response to OSC until after October 2023, when the FFL was finally put out of business. The final out of business date for FFL #1 was November 2, 2023, when FFL #1 Signed a Notice of Discontinuance of Business.

OCC ostensibly states in part that since the license was finally revoked that the allegations are not substantiated. This could not be further from the truth.

Omission of material facts and dates

OCC WB #1's April response in part to ATF through the OSC it was noted,

- (FFL #1) "was issued an initial Notice of Revocation in September of 2020 for numerous violations, of the Gun Control Act (Reference FFL #1 ATF Inspection Reports and Spartan Inspection Reports and SARs for FFL#1. (FFL #1), despite the Notice of Revocation has been allowed to manufacture, acquire, and sell firearms and continues to do so as of April 2023. The failure to revoke or timely revoke their license may constitute gross mismanagement, an abuse of authority and a specific danger to public safety."

OCC makes cursory mention of the timeliness of the revocation by stating:

“As interviews of ATF personnel make clear, in retrospect, it took longer to put FFL#1 out of business than they would have liked.”

This is an understatement to say the least. OCC conveniently fails to make any mention of when FFL #1 was served their initial Notice of Revocation, which was issued on September 17, 2020.

The material fact omitted by ATF to any discussion of the reasonableness of its actions is that it took over 3 years to revoke a corrupt FFLs Federal Firearms License, which was clearly not timely. ATF allowed the FFL to operate as usual the entire time despite the numerous well documented violations that are specified in the revocation notice. Furthermore, as acknowledged by OCC’s response the FFL was subject to a criminal investigation and a June 2022 non-prosecution agreement, which OCC seemingly appears to use as evidence that the ATF protected public safety.

ATF does not protect public safety when it takes over three years to revoke and shutdown a corrupt FFL.

The fact that cannot be disputed is despite the egregious nature of the violations cited, and information obtained during the criminal investigation of the FFLs involvement in criminal activity, ATF still allowed the FFL to operate until November 2, 2023, which again was over 3 years after the initial Notice of Revocation was issued to the FFL.

This again is an example of the agency’s gross mismanagement and a failure to protect public safety.

In WB#1’s April response to ATF IAD through OSC it was noted:

(FFL #1) “was subject to criminal enforcement investigation by ATF and signed a settlement agreement with the U.S. Attorney’s Office in Connecticut in July 2022 to resolve these charges. As part of the settlement agreement (FFL #1) agreed to liquidate their inventory of firearms and could request stays of revocation while doing so. (FFL #1) was required to provide detailed status reports to justify these stays. ATF continued to issue stays at least through March 2023 without obtaining detailed status reports. It was further discovered that (FFL #1) was continuing to manufacture, acquire and sell firearms throughout their stay of revocation. (FFL #1’s) FFL is still active as of April 2023. ATF in the past has issued guidance and conditions on FFLs that were undergoing revocation to ensure an orderly wind down of the business, including stipulations that the Revoked FFL may no longer acquire firearms. No such conditions were placed on (FFL #1), which is further evidence of gross mismanagement, an abuse of authority and a specific danger to public safety.”

OCC makes mention of the stays in their response yet fails to make any mention of the additional allegations filed in April 2023 by WB#1, including that FFL #1 was still actively manufacturing and acquiring firearms throughout their stays of revocation. In the experience of WB#1 this

arrangement of allowing a revoked FFL to still *manufacture and acquire* firearms was highly unusual and another example of gross mismanagement of the FFLs revocation by the BFD. In similar revocations with less egregious violations FFLs under revocation have been advised that they may no longer manufacture or acquire firearms after a certain date while in a wind down period after revocation while no such stipulation was placed on FFL #1.

**Missing Inspection Report, Fraud, Waste and Abuse,
and Failure to Follow ATF Policy**

In WB#1's April response to ATF IAD through OSC it was noted:

- (Redacted) "directed ATF IOIs to conduct a limited inspection of FFL #1 in February 2021 while they were under revocation. There was no inspection report created documenting this inspection and there was no report of violations issued for the inspection, which is contrary to ATF Policy, including the IOI Manual and ATF Order 5370.1E, Federal Firearms Administrative Action Policy and Procedures."

OCC stated under section IV. B that:

"There is no factual basis for any additional findings of wrongdoing. There appears to be allegations from an IOI, related to a lack of documentation in Nspect and Spartan (the two ATF Systems used by IOIs to track their cases) regarding an "Inventory inspection" done by the BFD of FFL#1. However, these allegations if true would not constitute wrongdoing by ATF personnel or employees. IAD did recommend possible changes to ATF systems to allow for better record keeping of these kinds of inspections, but given the rarity of these kinds of inspections, it is not clear such changes in ATF systems is warranted."

In numerous years of experience WB#1 has not encountered a situation where IOIs were directed to inspect a FFL without generating an inspection report and documenting that report or assignment in Spartan or Nspect. ATF has historically conducted full inspections and more limited inspections to address specific issues which have been classified as "Special Inspections" but even in these cases a separate assignment and report is generated in the system which document the work performed.

In the case of the February 2021 inspection, IOIs were brought in from outside the state to conduct the inspection expending government funds and resources as well as taxpayer dollars. Failing to generate a report of the activities and establishing what the purpose of the inspection was fail basic tests of government accountability and the use of resources by ATF.

Furthermore, the failure to generate a report, and/or establish clear guidelines for the inspection, and what the purpose of the inspection was constitute fraud, waste, and abuse by ATF in failing to account for the expenditure of taxpayer dollars for the February 2021 "off the books" inspection.

Additionally, ATF Policy as referenced as in the IOI Manual and Federal Firearms Administrative Action Policy and Procedures dictate under Section 6 – Policy, state in part that a Report of Violations will be issued for all violations identified.

The February 2021 inspection did in fact find violations, yet no Report of Violations was created or issued, nor entered into Nspect or Spartan.

Additionally, ATF Policy as referenced as in the IOI Manual and Federal Firearms Administrative Action Policy and Procedures dictate under Section 9 - Field Responsibilities, Policy state in part that: The IOI will conduct the inspection per ATF guidelines including use of the standard narrative report and worksheet and obtain and preserve all evidence of violations, including Acquisition and Disposition Records.

Clearly the February 2021 inspection was not conducted in accordance with ATF policy to include the ATF Order 5370.1, Federal Firearms Administrative Action Policy and Procedures as detailed here.

Furthermore, the inspection of an FFL, expenditure of funds, and the failure to create a report to document the work performed is contrary to other federal laws and regulations and likely violates the Federal Records Act of 1950 under 44 U.S.C. Chapter 31 & 32, Section 3101.

Indeed, the failure to conduct the inspection in accordance with ATF Policy and the failure to create an assignment and inspection report that is documented in the inspection management system could place ATF in jeopardy of violating its own inspection authority under 18 U.S.C. 923(g)(1)(A) which places limits on ATF inspections to not more than once during a 12-month period. By failing to document the inspection in Nspect or Spartan and failing to generate a report could have resulted in IOIs inadvertently starting another inspection prior to the yearlong break period that is mandated by law.

The failure to create an assignment and report for the off the books February 2021 inspection is yet again another example of gross mismanagement by BFD, an abuse of authority, and threat to public safety. Indeed, a thorough inspection at that time would have, or should have resulted in the discovery that there were ongoing violations of the Gun Control Act occurring at FFL#1, including the failure to report the multiple sale of handguns to ATF in violation of 18 U.S.C. 923(g)(3), which will be referenced in greater detail below.

Gross Mismanagement and Undo Deference to the ATF Criminal Case

OCC in making excuses for the length of time to revoke states under section III.:

“Generally, where an FFL’s firearm violations may rise to the level of seriousness for criminal prosecution, ATF prioritizes criminal investigation and enforcement over regulatory enforcement because criminal violations represent more serious conduct where higher penalties beyond license revocation are typically more appropriate. ATF tries to avoid situations where regulatory enforcement could complicate or deter criminal prosecution for serious firearms or other offenses committed by licensees.”

What OCC fails to disclose is that ATF policy permits a parallel track where administrative action and revocations can be conducted concurrently with a criminal case with the approval of the U.S. Attorney's Office. ATF has in fact done this in other FFL cases where the license was revoked, and the FFL was subject to criminal prosecution. Had ATF pursued a parallel track in this case they may have avoided the situation where a corrupt FFL was allowed to continue business for 3 plus years following the initial Notice of Revocation. Additionally, ATF has well documented instances of failing to obtain a successful prosecution with the U.S. Attorney's Offices in Connecticut as well as other jurisdictions.

Therefore, this over reliance on using a criminal case to revoke the FFL in place of a parallel administrative action is yet another example of gross mismanagement by ATF in handling the revocation of FFL #1.

OCC Omission of Additional Complaint involving the issuance of FFL to Applicant #1

As detailed at the beginning of this report OCC omitted a response to additional misconduct that was reported to ATF IAD by WB#1 in April of 2023 regarding the issuance of an FFL to Applicant #1. The OCC response to the OSC referral is therefore materially deficient and should not be accepted as reasonable by OSC.

In WB#1's April response to ATF IAD through OSC it was noted in part that:

- The Settlement Agreement required that (FFL #1's) inventory and/or business be sold to an independent third party in an arm's length transaction. DIO approved an Application for Applicant #1 in March 2023. (Applicant #1) has been associated with (FFL #1) for years, was an employee of (FFL #1) and had been a responsible person on the FFL for (FFL #1) since September 2020. (Applicant #1) was also implicated in ongoing violations of the Gun Control Act as detailed under the inspection report and accompanying SAR reports, as well as other suspected criminal activity. (Applicant #1) also failed to provide or execute a Purchase and Sale Agreement during the application inspection, and refused to answer questions as to what he was exactly buying for the business and omitted and concealed material information during the application inspection.
- Boston Field Division management including (Redacted) have engaged in activity that may constitute gross mismanagement, an abuse of authority and a specific danger to public safety regarding the issuance of a Federal Firearms License to (Applicant #1). The issuance of the license and handling of the application was also contrary to ATF Orders and Policy. Specifically, a recommendation of denial was made for the application for the FFL for violations that warrant denial, including false statements and material omissions on the application. The latest ATF Order 5370.1E, Federal Firearms Administrative Action Policy and Procedures requires that denials with these violations be briefed to ATF headquarters and that a Monitored Case Brief be prepared and forwarded to ATF Headquarters for review. See also the Monitored Case Program (MCP) process June 2022 update and Monitored Case Program Order 3200.1B.

OCC makes little to no mention regarding the allegations of misconduct in the issuance of the license to Applicant #1. As a result, the OCC response to the WB#1 complaint is materially deficient and OSC should find the agency report unreasonable.

OCC in its response states:

“ATF was not able to expedite the application because questions arose whether the purchaser was to close to the owner of FFL#1 and satisfied the terms of the non-prosecution agreement requiring sale to an “independent third party”. It took time for ATF to resolve the facts surrounding this relationship to the agencies satisfaction. As a result, FFL #1 stayed in business until October 30, 2023.”

What OCC conveniently omits is that the application inspection filed by Applicant #1 was initially determined to be materially deficient in September 2022, and it was noted that the proposed purchaser of FFL #1 had worked for FFL #1 for many years and was a responsible person on the existing license that was being revoked.

Ultimately it was recommended that Applicant #1 be Denied in December 2022. The Denial was recommended in part due to Applicant #1's, failure to report the multiple sale of handguns to ATF, as well as material omissions and false statements on the application. The denial was initially supported by the Area Supervisor and Director of Industry Operations.

WB#1 alleges that the issuance of the FFL to Applicant #1 was improper by ATF due to the violations discovered during the application inspection, including ongoing violations of the GCA, material omissions, false statements and constitute another example of gross mismanagement within the ATF BFD, an abuse of authority, and a threat to public safety.

**OCC Misleading Statements in its written response
to the Department of Justice and OSC**

OCC as detailed above states on page 4 of their response:

“ATF was not able to expedite the application because questions arose whether the purchaser was to close to the owner of FFL#1 and satisfied the terms of the non-prosecution agreement requiring sale to an “independent third party”. It took time for ATF to resolve the facts surrounding this relationship to the agencies satisfaction. As a result, FFL #1 stayed in business until October 30, 2023.”

The last two sentences falsely imply that (FFL #1) was permitted to stay in business until October 2023 due to issues with the application. However, in addition to failing to address the internal ATF controversy over the initial denial recommendation, the OCC response also omits the key fact that the new application was approved by ATF and (Applicant #1) was issued a Federal Firearms License on March 21, 2023.

Since the new FFL was issued to the applicant on March 21, 2023, OCC does not explain why a corrupt FFL was allowed to stay in business until November 2, 2023.

**Failure to follow ATF Policy regarding
the initial Denial Recommendation for Applicant #1**

In issuing the license to Applicant #1 ATF Policy was not followed. Mainly there was no record found that the application denial was forwarded to ATF headquarters for review as required by the Federal Firearms Administrative Action Policy. ATF Order 5370 under Section 7 states in part that there are grounds for denial for withholding or misrepresenting material information in applying for a license. The order further outlines those inspections that merit consideration for revocations (a denial would be equivalent) where the DIO Proposes an alternate the inspection must be submitted to the Deputy Assistant Director for approval under *ATF O 3200.1B, Monitored Case Program*.

As previously stated, there was no evidence that a monitored case was created and forwarded to ATF Headquarters following the initial recommendation for the denial in violation of the Federal Firearms Administrative Action Policy as well as the Monitored Case Program. This is another example of gross mismanagement within the Boston Field Division and a violation of ATF Policy and an abuse of authority.

**Omissions and Misstatements regarding violations and Multiple Sales Reporting
Requirements**

Under Description of Investigation the OCC report states:

“ATF IAD conducted a thorough examination if the regulatory inspection and criminal investigation documentation contained in ATF’s case management and reporting systems, as well as employee emails documenting the events in question.”

OCC also states on page 4 regarding WB#1 allegations of a breach of the agreement of the agreement and improper extensions of the stays of revocation in part:

“...based on IAD’s findings, it does not appear ATF had any evidence of a breach. According to OSC’s referral letter, the whistleblower alleged the extensions were improper because FFL #1 did not provide the required status report on firearm sales with the extension request and has continued to engage in repeat GCA violations by failing to report approximately 68 multiple sales to ATF as required by 27 CFR 478.126a.”

Here again, OCC in its initial response fails to disclose additional relevant information and minimizes the amount of wrongdoing that was occurring by FFL #1 and Applicant #1. According to the OCC report, IAD conducted a thorough examination of ATF case management systems. The Firearms Application Inspection Report for FFL Applicant #1 and attachments in

Spartan reveal that in fact between the dates of the initial Notice of Revocation in September 2020 through December 2022 there were 203 unreported Multiple Sales, which is significantly more than what OCC states.

OCC on page 5 also states:

"The whistleblower also alleged a breach of the agreement because FFL #1 violated the GCA by failing to file Multiple Sales Reports with ATF as required by the GCA and its implementing regulations. It is unlikely new GCA violations that did not rise to the level of criminal conduct could constitute a breach of the agreement. While the non-prosecution agreement establishes additional criminal violations as a breach of the agreement, it is silent as to regulatory GCA violations. Such silence is irrelevant, however, because it appears FFL #1 did file Multiple Sales Reports, it simply erred in where it sent them. Moreover, these same sales were reported to the local police department. As a result, it is difficult to believe FFL #1 would have been found in breach even if the agreement contained a "no further violations" provision. Indeed, an unintentional error would not permit ATF to otherwise revoke an FFL's license because ATF may only revoke licenses for willful GCA violations."

OCC in its response above downplays the violation by focusing on a small part of the failure to Report Multiple Handguns Sale by excusing the violation by stating *"FFL #1 did file Multiple Sale Reports, it simply erred in where it sent them."* A review of the Application Inspection Report and accompanying SAR Reports revealed that ATF IOIs did discover that from the period of October 2022 thru December 2022, FFL #1 was sending/emailing the multiple handgun sales reports to the wrong address. However, the reports also revealed IOIs could find no documentation on file with the FFL that the unreported Multiple Handgun Sales Reports were submitted or attempted to be submitted to ATF between September 2020 and September 2022 (i.e. an email receipt or email record that the FFL could show the IOIs that attempts were made to properly submit the report to ATF). Notably, FFL #1 was cited multiple times for this same violation, making these ongoing repeat violations.

However, IOIs did discover that in the same period of September 2020 thru December 2022 there were nine multiple sales reports that were properly reported to ATF. The fact that some Multiple Handgun Sales reports were reported properly while the vast majority were not, is evidence that this was more than a "fat finger error" in typing in an email address to submit the reports. Furthermore, the FFL as cited for the same violation three times in the past, which points to this being a willful violation.

OCC in a particularly ignorant response and excuse for the FFL states *"Moreover, these same sales were reported to the local police department."*

ATF is the primary federal law enforcement agency that enforces federal firearms laws and regulations including investigating possible cases of firearms trafficking, not local police departments. ATF uses Multiple Handgun Sales Reports as one of the tools to monitor for possible firearms trafficking. The failure by (FFL #1) to submit these to ATF (despite repeated violations of the statute) interferes with ATF's ability to monitor and catch suspected traffickers.

Local police departments typically do not monitor these reports and do not typically investigate firearms trafficking.

FFLs who are engaged in firearms trafficking or the diversion of firearms may intentionally fail to report Multiple Handgun Sales to ATF in attempt to hide the diversion of firearms from lawful commerce and/or to aid and abet the dealing in firearms by unlicensed individuals.

Indeed, the Application Inspection Report and accompanying SAR reports revealed there were trafficking indicators occurring at FFL#1 between September 2020 thru December 2022, including the transfer of 89 firearms to the same individual as well as other suspected criminal activity. Some of these sales were also unreported multiple sales by the FFL. This was also a period when Applicant #1 was a responsible person on the FFL. The trafficking indicators and additional suspected criminal activity were referred to ATF Criminal Enforcement for further investigation. The outcome or action taken on the referrals is unknown.

OCC as detailed above regarding unreported multiple handgun sales, *“While the non-prosecution agreement establishes additional criminal violations as a breach of the agreement, it is silent as to regulatory GCA violations.”*

OCC again minimizes and omits key information by terming the violation a “regulatory violation”. What OCC fails to disclose is that failures to report the Multiple Sale of Handguns is also a federal criminal violation under 18 U.S.C. 922(m) and 18 U.S.C. 923(g)(3). Indeed, FFLs have been prosecuted for this same crime and other criminal violations. OCC by terming these as “regulatory” clearly is misdirecting the reader to take a minor view of these potentially criminal violations.

OCC as detailed above also states, *While the non-prosecution agreement establishes additional criminal violations as a breach of the agreement, it is silent as to regulatory GCA violations.”*

Conclusion

As detailed in this written response OSC should not accept the ATF response to WB #1 allegations as reasonable based on the numerous and substantial misstatements, material omissions, and false and misleading statements. Additionally, ATF’s response largely ignores all the additional allegations of wrongdoing that were provided to ATF IAD through the OSC in April 2023, including the improper issuance of an FFL to Applicant #1.

Furthermore, the response from ATF OCC fails to recommend virtually any policy changes or recommendations for improvement to address ATF’s shortcomings that were highlighted in the complaint.

The failure to make one positive concrete recommendation for improvement is shameful.

Since there are no highlighted examples to improvement by ATF OCC WB #1 makes the following common-sense recommendations:

- Stays of Revocation should not be approved by the Field Division without concurrence of ATF Headquarters.
- Stays of Revocation should not be approved by ATF past a 60-day period.
- FFLs who are revoked should be instructed to transfer all their remaining inventory to another FFL instead of being allowed to drag out the process as was done in this case for over one year after their Final Notice of Revocation (NOR).
 - As previously noted, the final Notice of Revocation was issued to FFL #1 in July 2022 and FFL #1 was allowed to continue business through October 2023.
- Stays of Revocation, if granted, should stipulate that the Revoked FFL may no longer acquire or manufacture additional firearms while operating under a stay of revocation/ ATF should also emphasize that the purpose of the stay is only to allow the orderly transfer of the FFLs remaining inventory, and orderly close out of the records – not for continuing “business as usual” as allowed with FFL #1.
- Settlement agreements should be reviewed and approved at the Headquarters level to ensure public safety is protected and ATF’s interests are preserved.
- There should be greater oversight of Field Divisions to ensure FFLs who are issued Notices of Revocation are timely revoked. Certainly, a Revocation should never under any circumstances have taken 3+ years.
- ATF should ensure Revocations are handled appropriately when warranted and are timely. ATF has been notified repeatedly of shortcoming of their inspections of FFLs and the timeliness of revocations dating back at least to 2004. As the current compliant (DI-23-000271) illustrates this issue appears to be ongoing. By way example:
 - Department of Justice (DOJ) Office of Inspection General (OIG) Report in 2004 stated in part: ***“The ATF Acts Infrequently to Revoke Federal Firearms Licenses, and the Process is Not Timely.” Reference DOJ OIG Report Number I-2004-005***
 - DOJ OIG Report in 2013 also stated in part: ***“ATF’s processing time for revocations of non-compliant FFL remains lengthy.” Reference DOJ OIG Report Number: I-2013-005.***

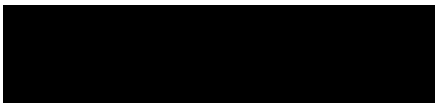
WB #1 complaint was filed under the protections of the Whistleblower Protection Act (WPA) of 1989, and the Whistleblower Enhancement Act of 2012. Pursuant to the WPA, federal employees are authorized to disclose evidence of waste, fraud, or abuse to the Office of Special

Counsel (OSC). The complaint was also made consistent with DOJ guidance in making protected disclosures to the OSC.

Per DOJ Guidance:

“Whistleblowing” is defined as the disclosure of information that an employee reasonably believes shows: a violation of any law, rule, or regulation; gross mismanagement; gross waste of funds; an abuse of authority; a substantial and specific danger to public health or safety; or censorship related to scientific research or analysis if censorship meets one of the above-listed categories. Employees’ disclosures to a range of officials are protected, including management officials, the Department’s Office of Inspector General (OIG), or the U.S. Office of Special Counsel (OSC).”

Signed:





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