



Audit Report



OIG-17-006

SAFETY AND SOUNDNESS:
OCC's Fast Track Enforcement Program Should Be Assessed

November 14, 2016

Office of
Inspector General
Department of the Treasury

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Abbreviations

BSA	Bank Secrecy Act
E&C	Enforcement and Compliance
FBO	foreign banking organizations
FinCEN	Financial Crimes Enforcement Network
Fast Track	Fast Track Enforcement Program
GPRMA	Government Performance and Results Modernization Act of 2010
IAP	Institution-Affiliated Party
OCC	Office of the Comptroller of the Currency
OTS	Office of Thrift Supervision
PACER	Public Access to Court Electronic Records
PPM	Policies and Procedures Manual
SAR	Suspicious Activity Report
USAO	United States Attorney's Office

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*The Department of the Treasury
Office of Inspector General*

November 14, 2016

Thomas J. Curry
Comptroller of the Currency
Office of the Comptroller of the Currency

This report presents the results of our audit of the Office of the Comptroller of the Currency's (OCC) supervision of bank processes to prevent, detect, and report criminal activities by insiders. We performed this audit out of concern over a case brought to our attention by the U.S. Attorney's Office (USAO), District of Minnesota. The case was discussed in a 2012 news release in which USAO announced that a California man and a New York man were sentenced in federal court in Minneapolis for their roles in a \$50-million bank fraud conspiracy that operated in six states, involved a network of bank employees, and victimized more than 500 individuals around the world by stealing their personal and financial information.¹ Appendix 1 provides more details of this case.

The objectives of our audit were to specifically: (1) identify the extent and nature of criminal and other suspicious activity committed by bank insiders reported to Financial Crimes Enforcement Network (FinCEN) under the Bank Secrecy Act (BSA) through a review of Suspicious Activity Reports (SARs) and related analytical studies; (2) identify OCC processes for pursuing enforcement actions against current or former bank insiders for which there is evidence of wrongdoing involving dishonesty, a breach of trust, or money laundering; (3) identify OCC examination procedures to ensure banks have sufficient processes to prevent, detect, and report internal criminal activities; (4) determine whether the procedures are applied; and (5) determine whether deficiencies identified during the examination process result in supervisory actions that are tracked.

¹ This case resulted from an on-going investigation, referred to as Operation Starburst. The investigation was led by the Minnesota Financial Crimes Task Force. The Office of Inspector General's Office of Investigations participated on the task force.

To accomplish our objectives, we reviewed applicable laws, regulations, policies, procedures, and guidance, as well as related documentation obtained from OCC or FinCEN. We interviewed key OCC officials and staff headquartered in Washington, D.C. and field offices in Wichita, Kansas; San Francisco, California; Minneapolis, Minnesota; and Birmingham, Alabama. We also interviewed key FinCEN officials in Washington, D.C. The scope of our audit ranged from calendar years 2009 through 2011. We conducted our fieldwork between December 2011 and June 2016.² Appendix 3 contains a detailed description of our objectives, scope, and methodology.

Results in Brief

OCC faces a considerable task in confronting bank insider wrongdoing. The volume of SARs received by FinCEN suggests that suspicious activity by bank insiders is still a large problem. During 2009–2011, FinCEN received and OCC downloaded into its SAR Fast Track Enforcement Program (Fast Track) database approximately 2.2 million SARs from banks, of which, approximately 1.3 million were filed by banks regulated by OCC or the legacy Office of Thrift Supervision (OTS), 48,500 of which involved bank insiders.³

We found OCC’s examination procedures reasonably address the prevention and detection of criminal activities by bank insiders if performed as warranted during ongoing safety and soundness examinations. Furthermore, OCC’s procedures include tracking of supervisory actions for any deficiencies identified during the examinations.

OCC’s Fast Track, administered by the Chief Counsel Office’s Enforcement and Compliance (E&C) Division, implements “streamlined enforcement” procedures aimed at keeping the banking industry safe and sound by using information from SARs, examinations, alerts, or other sources to pursue prohibitions of

² Given the time that has elapsed since initiating this audit, we continuously followed-up with OCC to ensure the information supporting our audit did not change.

³ OCC assumed supervisory responsibilities for savings and loans associations in July 2011 from the legacy OTS pursuant to the Dodd-Frank Wall Street Reform and Consumer Protection Act.

bank insiders from working in a financial institution, when bank insiders and other Institution-Affiliated Parties (IAPs) commit criminal acts or acts of significant wrongdoing involving banks. Under the authority of 12 U.S.C. 1818 (1818) or 12 U.S.C. 1829 (1829), OCC pursues enforcement actions against current or former bank employees for which there is evidence of wrongdoing, dishonesty, a breach of trust, or money laundering. We found that the policies and procedures for Fast Track were consistently followed. However, Fast Track was not as efficient and effective in pursuing prohibitions as it could be. The last assessment of Fast Track was completed in 2009 and did not include the establishment of specific performance metrics or an analysis of staffing levels needed to meet program goals. We concluded that Fast Track's staffing model limited the number of cases Fast Track could process.

Accordingly, we recommend that OCC assess Fast Track to determine whether the program's efficiency and effectiveness could be increased. This assessment should include, but is not limited to, the program's mission and goals, comprehensive requirements, performance results over time, current staffing levels, and additional training needs. As part of our reporting process, we provided a draft of this report to OCC management to obtain their views and comments. After incorporating comments as appropriate, OCC management provided a written response in which it agreed with our recommendation. Management further stated that OCC will assess the Fast Track Program to determine whether it is feasible to improve the program's efficiency and effectiveness to include processing more 1818 prohibition cases. We found OCC management's response meets the intent of our recommendation and have summarized the response in the recommendation section of this report. The response is provided in its entirety as Appendix 4.

Background

Internal fraud and unethical conduct within banks is of particular concern because of the position that banks hold in the financial system. Bank insiders have significant opportunity to benefit personally from unethical behavior. They have access to and control over large quantities of liquid financial assets, non-public

personal information, and business information. Individual instances of internal bank fraud can be significant for the banks and individual victims. According to fraud analysts, many banks are unwilling to report internal thefts to authorities. Banks often make the decision whether to prosecute cases based on sufficient proof and the risk to their reputation associated with having it publicly known. This may result in many banks firing the insiders without pursuing prosecution, which gives rise to the potential of an unethical bank insider perpetuating internal bank fraud should the individual seek employment with a different bank.

Responsibilities of Banks Relating to the Prevention, Detention, and Reporting of Internal Criminal Activities

Banks play a key role in preventing, detecting, and reporting internal criminal activities, and are primarily responsible for using due diligence when: (1) hiring employees; (2) reporting suspicious activity and potential fraud of bank insiders; (3) establishing and maintaining effective internal controls to identify and control risks; (4) incorporating internal or external audit systems appropriate to the size and nature of the activities of the bank; and (5) developing and implementing safeguards to protect the security, confidentiality, and integrity of consumer information.

Responsibilities of FinCEN

FinCEN is responsible for ensuring the collection, analysis, and dissemination of information collected under BSA, including, most notably, SARs. These reports serve not only to provide law enforcement, intelligence, and regulatory agencies with leads indicative of illicit activity, but also to provide a fertile source for identifying trends and patterns of illicit activity, as well as compliance-related deficiencies.

Responsibilities of OCC

OCC's Fast Track:

Fast Track is primarily a law department-supported program, with leadership and coordination of the program housed within the E&C Division. Fast Track was established in 1995 to implement OCC's policy to support and enforce the requirements of banks to report

violations of federal criminal law to FinCEN, as well as applicable enforcement statutes, aimed at keeping the banking industry safe and sound. Fast Track has a Policy and Procedures Manual (PPM) 5310-8⁴ that includes guidelines to support and enforce the requirements of applicable enforcement statutes. It also has a program procedures manual⁵ detailing procedures for pursuing prohibitions under the authority of these statutes.

According to the program procedures manual, the program takes enforcement actions to prohibit current or former bank insiders from working at banks. BSA requires banks to report criminal violations or other suspicious transactions related to money laundering activity or BSA by filing a SAR with FinCEN. The SAR details the facts about the activity that may serve as the basis for criminal investigation and prosecution by law enforcement agencies. Under the authority of 1818 or 1829, Fast Track uses information from SARs, examinations, alerts, or other sources to pursue enforcement actions against current or former bank insiders to prohibit them from working in an insured depository institution if there is sufficient evidence of wrongdoing, dishonesty, a breach of trust, or money laundering.

The information is screened and selected for case processing based primarily on the following criteria, amongst others: (1) the wrongdoing involves the following identifiers: director, officer, employee, agent & owner (or controlling agent) (with priority given to officers, directors and other identifiers who are the subject of multiple SARs); (2) the amount involved is at least \$5,000⁶ (with priority given to cases involving \$25,000 or more); and (3) the date of the SAR filing is within the preceding two years. OCC may also focus on cases in a special area of interest such as identity theft, privacy of customer records, or mortgage fraud.

OCC's E&C Division has primary responsibility for the program and for determining whether to pursue prohibition actions under 1818 and 1829, as follows:

⁴ OCC's PPM 5310-8 (REV), *Fast Track Enforcement Program* (December 20, 2007).

⁵ OCC's *Fast Track Enforcement Program Procedures Manual* (June 19, 2012).

⁶ This standard is satisfied if more than one SAR is filed on an IAP and the aggregated amount involved is at least \$5,000.

1818: OCC can pursue an 1818 prohibition order, which is an industry-wide ban on an employee from working in an insured depository institution. The ban remains in effect indefinitely unless terminated by OCC. Under Fast Track, OCC pursues an 1818 prohibition order when there is an admission of wrongdoing, or OCC has obtained clear evidence of wrongdoing, and the amount of the loss or transaction is at least \$5,000.

More specifically, OCC is required to establish that: (1) the employee violated the law, regulation, cease and desist order, formal agreement, or condition imposed in writing, participated in an unsafe or unsound banking practice or committed a breach of fiduciary duty; (2) such conduct resulted or will probably result in a loss to the bank, resulted in financial gain or other benefit to the employee, or has prejudiced the interests of the depositors; and (3) such conduct evidences dishonesty or a continuing or willful disregard for the safety and soundness of the bank. 1818 prohibition orders are obtained by consent of the employee or by the issuance of a final order of the Comptroller following a hearing before an administrative law judge.⁷

1829: Under 1829, an individual is effectively prohibited by operation of law from working in an insured depository institution once he or she has been convicted of, or upon entering into a pretrial diversion program for,⁸ a crime involving dishonesty or breach of trust. In such cases, OCC obtains the judgment or conviction documents from the court and sends the individual an 1829 prohibition letter informing him or her of the automatic prohibition. If, after receiving such a letter, the person re-enters the banking industry in violation of 1829, he or she does so knowingly and may, therefore, be subject to criminal fines and penalties. The ban remains in effect

⁷ A prohibition order issued by the Comptroller may be appealed into federal circuit court.

⁸ Types of pretrial diversion programs are deferred prosecution, deferred sentencing, or deferred adjudication that avoids conviction if the person successfully completes a probationary period. Under a typical federal pretrial diversion agreement, an offender enters into a program of supervised probation, and upon successful completion, the U.S. Attorney will decline prosecution, and the charges will be dismissed. Similar programs at the state level have various names, including deferred prosecution agreements. They will be referred to hereafter, collectively, as pretrial diversion programs.

indefinitely, unless terminated by the Federal Deposit Insurance Corporation.

OCC may close a case when: (1) there is no admission and no clear evidence of wrongdoing; (2) several unsuccessful attempts have been made to contact the individual; or (3) the 5-year statute of limitations has run.⁹ In such cases, a no-action memo is written. Final decisions on no-action cases will be made by the E&C Division, which will determine, for example: (1) whether a case should be pursued even when the initial evidence is not clear, if such cases may be developed through further investigation, including (in rare cases) an order of investigation; or (2) in cases where the 5-year statute of limitations has run, whether an enforcement action short of a prohibition should be pursued (such as a personal cease and desist order) after taking into account litigation risks.

As required by 1818, OCC lists the names of the recipients of 1818 prohibition orders on its website. OCC also lists the names of the recipients of 1829 prohibition letters on its website. Through this means, OCC is able to inform the public, including banks making employment decisions, that certain individuals are prohibited from working in the banking industry. These enforcement actions taken by OCC are searchable through an Enforcement Action Search Tool on the website.

OCC Safety and Soundness Examinations:

OCC performs safety and soundness examinations of banks on an ongoing basis. For supervisory purposes, OCC designates each bank as large, mid-size, or community bank. Large and mid-size banks are supervised through the OCC headquarters office, which follows a supervisory process detailed in its Bank Supervision booklet. Examinations are performed on a 12-month supervisory

⁹ 1818 prohibition orders are subject to a 5-year statute of limitations. In general, to avoid statute of limitations issues, OCC has 5 years from the date of the bank insider's bad act to settle the case or file a notice of charges. A case may also be closed if the subject of the SAR is a foreign national who has committed a criminal act or significant wrongdoing in a foreign country where no domestic accounts were involved.

cycle. Community banks and federal branches of foreign banks¹⁰ are supervised under the oversight of district deputy comptrollers, which follow a supervisory process detailed in the “Community Bank Supervision” booklet and the “Federal Branches and Agencies Supervision” handbook. In smaller national bank affiliates, community banks, and federal branches and agencies of foreign banks, there is flexibility in both when and how examination activities are performed during the 12 or 18-month supervisory cycle. OCC employs a risk-based supervisory philosophy focused on evaluating risk, identifying problems, and ensuring banks take appropriate corrective action.

Audit Results

OCC faces a considerable task in confronting bank insider wrongdoing. We found that the volume of SARs received by FinCEN suggests that suspicious activity by bank insiders is a large problem. During 2009–2011, FinCEN received, and OCC downloaded into its SAR Fast Track database, approximately 2.2 million SARs from banks, of which, approximately 1.3 million were filed by banks regulated by OCC or the legacy OTS. Furthermore, of the 1.3 million SARs, there were approximately 48,500 IAP¹¹ relationships identified by banks, though not all of

¹⁰ The International Banking Act of 1978 allowed foreign banking organizations (FBO) the option to conduct banking operations in the U.S. through a branch or agency chartered by OCC. A federal branch is an FBO’s office licensed by OCC to exercise such banking powers as accepting deposits and operating as a fiduciary.

¹¹ The Federal Deposit Insurance Act defines an IAP as (1) any director, officer, employee, or controlling stockholder (other than a bank holding company or savings and loan holding company), of, or agent for an insured depository institution; (2) any other person who has filed or is required to file a change-in-control notice with the appropriate federal banking agency under section 7(j); (3) any shareholder (other than a bank holding company or savings and loan holding company), consultant, joint venture partner; and any other person as determined by the appropriate federal banking agency (by regulation or case-by-case) who participates in the conduct of the affairs of an insured depository institution; and (4) any independent contractor (including any attorney, appraiser, or accountant) who knowingly or recklessly participates in (a) any violation of any law or regulation; (b) any breach of fiduciary duty; or (c) any unsafe or unsound practice, which caused or is likely to cause more than a minimal financial loss to, or a significant adverse effect on, the insured depository institution. Relating to IAP relationships, OCC primarily pursues actions related to the following identifiers: director, officer, employee, agent, and owner (or controlling shareholder) which we will refer to collectively as bank insiders throughout this report.

these would meet the criteria for the Fast Track program or lead to a prohibition, if processed.

We found that OCC's examination procedures reasonably address the prevention and detection of criminal activities by bank insiders if performed as warranted during ongoing safety and soundness examinations. OCC examiners employ a risk-based supervisory approach focused on evaluating risk, identifying problems, and ensuring banks take appropriate corrective action. As part of this approach, OCC examiners stated that they review bank internal control and audit functions. OCC also tracks its supervisory actions for any deficiencies it identifies during these examinations. When irregularities or potential fraud are identified during an examination, it is the bank's duty to submit a timely SAR, which notifies law enforcement, and OCC. The banks conduct their own investigations, and OCC will follow up with banks and provide any back up banks may need. OCC also performs pre-employment screening at banks in certain circumstances. Appendix 2 provides more details of these procedures.

We reviewed Fast Track's processes in pursuing 1818 and 1829 prohibition actions against bank insiders. Based on our review of documentation and interviews with the program coordinator, we concluded that they consistently followed the applicable policies and procedures. However, we concluded that Fast Track was not as efficient and effective in pursuing prohibitions as it could be.

Finding

OCC Should Assess Fast Track

We found that Fast Track had not been assessed since 2009 and did not include the establishment of specific performance metrics or an analysis of staffing levels needed to meet program goals. We also concluded that Fast Track's staffing model limited the number of cases Fast Track could process.

Fast Track Staffing and Training

According to OCC officials, Fast Track could benefit from additional and permanent staffing. Thirteen (13) law department support staff process Fast Track case files, including one full-time program coordinator and 12 law-department support staff who process Fast Track case files on a voluntary part-time basis once

their primary duties are addressed. These individuals undergo Fast Track training and must demonstrate competence to perform the work satisfactorily, which leads to an OCC certification as a Fast Track Processor I or II.

OCC's law department's senior management determined the staffing levels. Prior to 2009, most 1829 and 1818 cases were developed by one lead Fast Track coordinator. In 2009, the program was expanded to permit other support staff in the law department to participate on a voluntary basis. It was at that time the positions of Fast Track processor I and II were developed. Volunteers for these positions were advertised on the OCC's internal opportunities board as a developmental opportunity for law department support staff in headquarters and the four main district offices.

When asked how it was determined that the Fast Track staffing level was appropriate, we were told that although the program has undergone significant changes through the years, which necessitated staffing considerations, there has never been a formal written assessment of staffing levels. OCC officials stated that except for the Fast Track coordinator, all other personnel who worked on the Fast Track program have other primary duties that take up most of their time. Furthermore, OCC has not established specific performance measures for the number of 1818 or 1829 cases to be processed by Fast Track each year, which could be used as a basis in determining the right number of staffing for the program results that management wants to achieve.

Given the limited staff and high number of SARs downloaded into its SAR Fast Track database by OCC, many cases were either never assigned or delayed in being assigned to processors. OCC downloaded approximately 48,500 SARs received by FinCEN related to bank insiders during calendar years 2009 through 2011. According to a Fast Track report, 12,102 of the 48,500 SARs met the \$5,000 threshold for selection and assignment to processors. However, during that time, Fast Track only processed 554 of the 12,102 SARs, leaving more than 95 percent of the SARs unassigned or unprocessed. That said, not all of the unassigned or unprocessed cases would have met the Fast Track criteria for either an 1829 letter or 1818 prohibition.

OCC's PPM 5310-8 and its program procedures manual do not specify how long it should normally take to process a prohibition action (1829 prohibition letter or 1818 prohibition order). Of the 42 prohibition actions we sampled, 33 (nearly 80 percent) were issued in less than a year, ranging from 2 to 307 days; and 9 letters were issued in more than a year, ranging from 432 to 993 days. The program coordinator told us that some of the more lengthy processing times were primarily due to waiting on criminal authorities to prosecute the criminal case, the processors being busy with other primary work responsibilities, or not receiving all the necessary documents related to court cases. The two 1818 prohibition orders in our sample, which involve additional research and procedures, took 269 and 442 days to be processed. 1818 prohibition orders generally take a longer time to process as OCC needs to generate detailed and sufficient evidence, rather than rely on the criminal process as is with the 1829 letters, and be prepared to litigate the case if the bank insider does not settle.

We noted that Fast Track could also benefit from additional training relating to the processing of 1818 prohibition orders. Although 1818 prohibition orders require additional work, they prohibit individuals not already prohibited by law. In these cases, the individual has not been convicted, but there is an admission of wrongdoing or clear evidence of wrongdoing;¹² and prosecution of the individual has been declined¹³ or is otherwise not being actively pursued by criminal law enforcement. An OCC official informed us that Fast Track primarily focuses on processing 1829 prohibition letters. During calendar years 2009 through 2011, 510, or 92 percent, of the 554 prohibition actions processed were 1829 prohibition letters and the remaining 44 were 1818 prohibition orders. However, individuals are already prohibited from working in the banking industry under 1829 once they have been convicted or

¹² In development of 1818 prohibition order cases, admission of wrongdoing or clear evidence of wrongdoing may be obtained from the: (1) SAR, (2) bank records, (3) court records, or (4) Public Access to Court Electronic Records (PACER) Service. PACER is an electronic public access service that allows users to obtain case and docket information online from federal appellate, district, and bankruptcy courts, and the PACER Case Locator, found at www.pacer.gov/.

¹³ Law enforcement agencies may decline to prosecute bank employees for their activities if the case does not meet prosecutorial guidelines (e.g., dollar amount of loss), or restitution has been made, or an employee's actions does not constitute a strong case of criminal law violation. In such cases, the employee's actions may still constitute an act of significant wrongdoing that may serve as a basis for an administrative enforcement action by the OCC against an employee.

have entered into a pretrial diversion program for a crime involving dishonesty or breach of trust. An OCC official told us that the volunteer staff members would need additional training¹⁴ to process more of the complex 1818 prohibition orders.

We inquired as to why OCC issued 1829 prohibition letters given that the recipient of the letters were already banned from banking by 1829. According to an OCC official, the 1829 prohibition letters are useful in notifying the individuals that they are prohibited and that there is a criminal penalty for re-entering the banking industry. An 1829 prohibition letter can be used as evidence if an individual attempts to re-enter the banking industry. In addition, the 1829 prohibition letters are posted in a database on OCC's website so that banks can determine if a job applicant has been prohibited.

The OCC official also told us that he would like to see more 1818 prohibition orders pursued, but without reducing the number of 1829 prohibition letters issued. The official further stated that there are two potential ways to increase the effectiveness of the program: increasing the number of Fast Track processors focused on developing 1818 prohibition order cases or allowing OCC attorneys to develop 1818 prohibition order cases using information from the SARs. In the past, attorneys used SARs to develop 1818 cases on their own. However, the current structure of the program relies solely upon the Fast Track coordinator and volunteer support staff qualified as Fast Track processors to take the initial steps needed to develop 1818 cases from SARs. OCC officials informed us that, going forward, the E&C Division may consider changes, as appropriate, and in a matter consistent with the demands in the department, to make the program even more effective than it has been.

¹⁴ An individual would need additional training to be able to demonstrate proficiencies related to tasks such as: (1) conducting legal research by maneuvering in the various databases used in Fast Track; (2) communicating effectively in order to obtain detailed information from bank contacts, law enforcement entities; (3) examining bank documents to determine if there is sufficient evidence to support an 1818; (4) constructing an introduction letter to the employee; (5) communicating with the employee or their legal counsel in response to the introduction letter; (6) understanding when and how to follow-up with the bank investigator; and (7) drafting a Washington Supervisory Review Committee memo.

Monitoring and Assessing for Improvement

The Government Performance and Results Modernization Act of 2010 (GPRMA)¹⁵ requires agencies to set long-term goals and objectives as well as specific, near-term performance goals.¹⁶ Agency leaders at all levels of the organization are accountable for choosing goals and indicators wisely and for setting ambitious, yet realistic targets. Wise selection of goals and indicators should reflect careful analysis of the characteristics of the problems and opportunities to influence and to advance an agency mission, factors affecting those outcomes, agency capacity and priorities.

The GPRMA further requires agencies to measure performance against those goals and report publicly on progress. This includes for each agency goal: (1) reviewing the progress achieved during the most recent quarter, overall trend data, and the likelihood of meeting the planned level of performance; and (2) assessing whether relevant organizations, program activities, regulations, policies, and other activities are contributing as planned to the agency priority goals.

According to OCC officials, Fast Track does not have specific performance metrics to monitor the program's results. Rather, the officials told us that OCC publishes enforcement action statistics for OCC in its annual report. With regard to the number of 1818 cases listed each year in the annual report, some, but not all, come from Fast Track. By contrast, all of the 1829 cases are generated through Fast Track. In addition, according to OCC officials, Fast Track does not track the number of hours each case takes to process since, depending on the circumstances, each case varies on the time needed to be processed.

According to an OCC official, the last time OCC assessed Fast Track was in 2009, when the program was expanded to permit

¹⁵ Public Law 111- 352.

¹⁶ Office of Management and Budget Circular No. A-11, *Preparation, Submission, and Execution of the Budget* (A-11), "organizational components of agencies are not considered independent establishments, but rather are a part of them. A-11 further states that agencies should work with their components to implement the GPRMA Modernization Act in a manner that is most useful to the whole organization. Agencies are expected to work with their components to identify priorities, goals, performance indicators, and other indicators relative to the mission and strategic objectives of the agency."

Chief Counsel Office support staff to participate as either Fast Track I or II processors. We were told the assessment did not include the establishment of specific performance metrics or an analysis of staffing levels needed to meet program goals. Significant conforming changes were made to Fast Track's program manual and PPM 5310-8 during that time. When asked about the overall effectiveness of the program, OCC officials told us that they believe the program has been successful because it has allowed the agency to generate many 1829 letters through the years, as well as to supplement the number of 1818 prohibition cases.

Conclusion

With internal fraud and unethical conduct within banks being of particular concern because of the position that banks hold in the financial system, it is essential that proper controls and procedures are in place relating to criminal activities by bank insiders. Banks, FinCEN, and OCC all play key roles in the prevention, detection, and reporting of internal bank criminal activities. Banks providing SARs to FinCEN, which in turn, are then downloaded by OCC into its SAR Fast Track database, provide great opportunity to take action against bank insiders who try to benefit from unethical behavior. With the establishment of Fast Track and the examination procedures in place, OCC was able to take enforcement actions against some of these insiders. That said, Fast Track could make a larger impact by processing more 1818 prohibition cases that would ban more unethical bank insiders from working in the banking industry.

Recommendation

We recommend that the Comptroller of the Currency assess Fast Track to determine whether the program's efficiency and effectiveness can be increased. This assessment should include, but is not limited to, the program's purpose and goals, comprehensive requirements, performance results over time, current staffing levels, and additional training needs.

Management Response

OCC management agreed with our recommendation and stated that it will complete an assessment of Fast Track by September 30, 2016.

Office of Inspector General Comment

Management response meets the intent of our recommendation.

* * * * *

We appreciate the courtesies and cooperation provided to our staff during the audit. If you wish to discuss the report, you may contact me at (202) 927-5776 or Fawntrella Thompson, Auditor-in-Charge, at (202) 927-5512. Major contributors to this report are listed in Appendix 5.

/s/

Susan Barron
Audit Director

Auditor's Note: This appendix is a news release by the U.S. Attorney's Office, District of Minnesota, announcing the sentencing of two individuals for their role in a \$50 million bank fraud conspiracy.

Leader of \$50-Million Fraud Ring Sentenced

FOR IMMEDIATE RELEASE
August 13, 2012

MINNEAPOLIS – Earlier today in federal court in Minneapolis, a California man and a New York man were sentenced for their roles in a \$50-million bank fraud conspiracy that operated in six states, involved a network of bank employees, and victimized more than 500 individuals around the world by stealing their personal and financial information. The operation, deemed one of the largest and most sophisticated of its kind prosecuted in the U.S. to date, was carried out between 2006 and 2011 in Minnesota, California, Massachusetts, Arizona, New York, and Texas. United States District Court Chief Judge Michael J. Davis sentenced Julian Okeayaninneh, age 44, of Colton, California, the leader of the operation, to 324 months in federal prison on one count of bank fraud conspiracy, 11 counts of bank fraud, six counts of mail fraud, two counts of wire fraud, four counts of aggravated identity theft, one count of money laundering conspiracy, and one count of trafficking in false authentication features. In handing down the sentence, Judge Davis said, "This is one of the largest frauds I've ever seen. The sophisticated means used and the use of bank insiders in this fraud is troubling to the court. You are the leader, and it's a sad day that I have to send someone to prison for such a long time. But you deserve the sentence you receive."

Earlier in the day, Judge Davis sentenced Olugbenga Temidago Adeniran, age 36, of New York, to 266 months in federal prison on one count of bank fraud conspiracy, four counts of bank fraud, and four counts of aggravated identity theft. The two men were charged in a superseding indictment on June 7, 2011. They were convicted on February 28, 2012, following a three-week trial. Because the federal criminal justice system does not have parole, the men will spend virtually their entire sentences behind bars.

Following today's sentences, U.S. Attorney B. Todd Jones said, "As part of this conspiracy, crooked bank insiders bartered the personal financial information of their patrons. This violation of trust clearly threatens the confidence the public has traditionally placed in our financial institutions and cannot be tolerated. Today's sentences send a clear message to those identity thieves and fraudsters who conspire with dishonest bank employees to wreak havoc on the personal finances of innocent customers."

Louis Stephens, Special Agent in Charge of the local office of the U.S. Secret Service, added, "The sentences issued send an unmistakably strong message about the way our courts view this type of criminal activity. These defendants were leaders and members of a complex criminal conspiracy with an organizational hierarchy and effectiveness much like traditional organized crime. The successful investigation of this case represents a strong victory for the people of Minnesota and the integrity of the financial infrastructure of the United States."

The evidence presented at trial proved that from 2006 through March of 2011, Okeayaninne and Adeniran acted in concert with numerous co-conspirators to buy and sell stolen bank-customer information that was ultimately used to open fraudulent bank and credit card accounts, apply for loans, and obtain cash. Subsequently, co-conspirators altered checks for deposit into those fraudulent accounts and drafted checks against them. They also acquired cash from the fraudulent credit card accounts they established and used the false credit cards to purchase merchandise. Moreover, they co-opted home equity lines of credit without the knowledge or consent of the true account holders, using the lines of credit for their personal benefit. In addition to recruiting bank employees to assist in the scheme, co-conspirators regularly recruited other individuals to conduct fraudulent financial transaction, often transporting them to various banks around the country to commit their crimes.

The financial institutions victimized included American Express, Associated Bank, Bank of America, Capital One, Guaranty Bank, JP Morgan Chase Bank, TCF Bank, US Bank, Wachovia Bank, Washington Mutual, and Wells Fargo Bank. They provided

extensive cooperation and assistance throughout the course of the investigation and prosecution of this case.

This case resulted from an on-going investigation, dubbed Operation Starburst. The investigation was led by the Minnesota Financial Crimes Task Force, which was established pursuant to state law. The task force investigates financial crimes related to identity theft, with a special emphasis on organized criminal enterprises. It is comprised of local, state, and federal law enforcement investigators dedicated to combating the growing trend of cross-jurisdictional financial crimes. Among them are agents from U.S. Secret Service and IRS—Criminal Investigations. "Putting these criminals and their cohorts behind bars will prevent many more Minnesotans from becoming identity theft victims," said Patrick Henry, task force commander, of the Minnesota Bureau of Criminal Apprehension. "Today's sentencing send a clear warning to those who would target Minnesotans for identity theft that this task force and its partners are diligent in investigating these crimes even when they are being committed from beyond our borders."

"Investigating identity theft is a priority for IRS Criminal Investigations," added Kelly Jackson, Special Agent in Charge of the IRS-Criminal Investigations' St. Paul Field Office. "Stealing identities is a serious crime that hurts many innocent people. IRS-Criminal Investigations, along with our law enforcement partners and the U.S. Attorney's Office, remain vigilant in identifying, investigating and prosecuting those individuals who seek to willfully defraud U.S. citizens and have a blatant disregard for the victims of their schemes."

Trial testimony proved that Adeniran was a high-level manager in the conspiracy. He directed operations and routinely traveled to Minnesota to obtain cash from banks and purchase merchandise from Mall of America and Southdale Mall with the use of fraudulent credit cards. Okeyainneh, however, was the leader of the conspiracy. After his arrest, authorities found more than 8,000 stolen identifiers in his storage locker, including hospital records, bank records, credit reports, commercial checks, credit card mailers, and motor vehicle information. According to trial testimony, the stolen information was used to create false

identification documents, sometimes in less than an hour. Okeayainneh, himself, had 27 fraudulent driver's licenses bearing his photography. At the time of his arrest, he also possessed more than 140 photos of co-conspirators, including Adeniran, ready to be attached to false identification. In addition, he had check stock and blank American Express credit cards for use in making false financial instruments.

During the life of the conspiracy, Okeayainneh commanded the managers and foot soldiers in the operation to commit the fraud, which afforded him layers of protection from exposure as the actual leader of the ring. He directed a legion of people, some of whom provided him with stolen personal identifiers, while others used that information to create false identification. Then, armed with those false identification documents and fraudulent financial instruments, co-conspirators traveled the country, committing fraud on behalf of the conspiracy.

Status of Co-conspirators—

On July 20, 2012, Fawsiyo Hassan Farah, age 43, of Brooklyn Park, a former personal banker at Wells Fargo Bank, was sentenced to 33 months in prison on one count of aiding and abetting bank fraud and one count of aiding and abetting aggravated identity theft. She was charged in a superseding indictment on June 7, 2011, and pleaded guilty on August 15, 2011.

On August 6, 2012, Charles Tubman Dwamina, age 47, of Lino Lakes, a former personal banker at Wells Fargo Bank, was sentenced to 12 months and one day on one count of aiding and abetting bank fraud. He pleaded guilty on January 6, 2012.

Jonathan Sie Earley, age 50, of Brooklyn Center, will be sentenced this afternoon. On June 14, 2011, he pleaded guilty to one count of aiding and abetting bank fraud and one count of aggravated identity theft.

Jude Obira Okafor, age 46, of Fridley, will be sentenced tomorrow. On December 19, 2011, he pleaded guilty to one count of aiding and abetting bank fraud. He faces a potential maximum penalty of 30 years in prison.

Sundayga Dexter Roberts, age 48, of Brooklyn Park, a former personal banker at Wells Fargo Bank and Associated Bank, will be sentenced tomorrow. On September 6, 2011, he pleaded guilty to one count of aiding and abetting bank fraud and one count of aiding and abetting aggravated identity theft. For his crimes, Roberts faces a potential maximum penalty of 30 years on the bank fraud charge and a consecutive mandatory minimum penalty of two years on the aggravated identity theft charge.

Adetokunbo Olubunmi Adejumo, age 35, of Osseo, will be sentenced tomorrow. On July 26, 2011, he pleaded guilty to one count of aiding and abetting bank fraud and one count of aiding and abetting aggravated identity theft. He faces a potential maximum penalty of 30 years on the bank fraud charge and a consecutive mandatory minimum penalty of two years on the aggravated identity theft charge.

Three co-defendants remain fugitives: Charles Amankwah Akuffo, age 31, no known address; Oladipo Sowunmi Coker, age 31, of Minneapolis; and Betty White, of Los Angeles, California. Akuffo was charged with one count of bank fraud conspiracy, three counts of bank fraud, and three counts of aggravated identity theft. Coker was charged with one count of bank fraud conspiracy, 11 counts of bank fraud, seven counts of mail fraud, six counts of aggravated identity theft, and one count of money laundering conspiracy. White was charged with one count of bank fraud conspiracy, five counts of bank fraud, and one count of aggravated identity theft.

The Minnesota Financial Crimes Task Force serves the entire District of Minnesota, presenting its cases to county or federal prosecutors, as appropriate. Its participants include the U.S. Secret Service, the U.S. Postal Inspection Service, U.S. Immigration and Customs Enforcement's Homeland Security Investigations, the Internal Revenue Service—Criminal Investigations, the Social Security Administration, the U.S. Department of Treasury—Office of Inspector General, the Federal Deposit Insurance Corporation—Office of Inspector General, the Minneapolis Police Department, the Edina Police Department, the Baxter Police Department, the Duluth Police Department, the Wright County Sheriff's Office, the Ramsey

County Sheriff's Office, the Mille Lacs County Sheriff's Office, and the Minnesota Bureau of Criminal Apprehension.

In this case, the task force was assisted by the police department in Eau Claire, Wisconsin, and the Las Vegas metropolitan police, as well as other law enforcement agencies across the country. The case was prosecuted and tried by Assistant U.S. Attorneys Ann M. Anaya and Lola Velazquez-Aguilu.

The task force and the Minnesota U.S. Attorney's Office want to remind people to protect themselves from identity theft. For more information, visit www.stopfraud.gov/protect-identity.html.

In separate but related cases, many of which were developed and charged early on in the investigation, numerous defendants have pleaded guilty and a number of them have already been sentenced—

On August 2, 2012, Borode Ayinde Akinropo was sentenced to time served on one count of bank fraud and one count of aggravated identity theft. Akinropo was charged on March 30, 2011, and pleaded guilty on June 7, 2011.

On July 12, 2012, Angela Kay Grigsby was sentenced to time served on one count of bank fraud and one count of aggravated identity theft. She was charged on January 12, 2011, and pleaded guilty on January 24, 2011. She was a foot soldier for the conspiracy, conducting fraudulent financial transactions on its behalf.

Also on July 12, 2012, Michael Kweku Asibu, a former banker at Bremer Bank and Associated Bank, was sentenced to 42 months in federal prison on one count of bank fraud and one count of aggravated identity theft. He was charged on November 23, 2011, and pleaded guilty on December 14, 2011.

The Office of the Comptroller of the Currency's (OCC) risk-based supervisory approach requires OCC examiners to determine how certain existing or emerging issues for a bank affect the nature and extent of risk in that institution. Evaluating a bank's system of internal controls, as well as its audit function, is essential to identifying risks. The following are procedures OCC examiners stated are performed, as warranted, related to internal control processes and audit functions, as well as expanded procedures if areas of concerns relating to internal criminal activities arise:

Review of Banks' Internal Control Processes:

Examiners assess and draw conclusions about the adequacy of a bank's internal control during every supervisory cycle, which may include the following procedures:

- determining the scope, type, and depth of an internal control review based on the bank's size, complexity, scope of activities, and risk profile, as well as on OCC's assessment of the bank's audit functions;
- performing validations, which may encompass inquiry, observation, and testing of the bank's control systems;
- using questionnaires as part of their assessments of internal control;
- reviewing banks' policies and procedures on insider activities; and/or
- reviewing Suspicious Activity Reports (SARs) at banks, as necessary, depending on the issues identified.

Banks' Audit Functions:

OCC examiners assess banks' overall audit function during each supervisory cycle, which include the following procedures:

- drawing an overall conclusion about the adequacy and effectiveness of the overall audit program and the board of directors' oversight of the audit program; and

- assigning a rating of strong, satisfactory, or weak to the overall audit program;
- focusing on the sufficiency of the banks' internal audit and audit programs and their processes to ensure that the banks have sufficient controls in place and are up-to-date on current issues to maintain safe and sound practices; and
- performing a quarterly review at banks, which includes review of audit reports and board minutes for discussions of insider activities.

Following risk evaluations, OCC examiners tailor supervisory activities to the risks identified. For areas of higher risk, such as when a specific instance is identified indicating possible wrongdoing by a bank employee, OCC examiners expand the procedures they perform.¹⁷ These expanded procedures may result in the recommendation of corrective actions if deficiencies are noted during an examination. If a deviation is severe and not in accordance with sound banking policy, OCC will issue a matter requiring attention, which must be addressed within a deadline set by OCC. OCC monitors any deficiencies noted, as well as the related corrective actions, and enters the information in a database. OCC examiners review banks' internal audit reports. Upon review of the reports, OCC examiners go where the leads take them. OCC examiners look (1) for controls that are in place at the bank, (2) at the bank's external audit report, and (3) to determine if the bank's methods are effective. OCC requires the bank to have an audit that includes a review of the controls, and if OCC has concerns, they will conduct their own review.

OCC looks to banks to do their best to uncover irregularities or fraud by their own internal auditors and correct issues before OCC has to step in. There have been times when OCC suggests to a bank to hire a forensic auditor. OCC examiners conduct oversight to monitor how banks are regulating their operations and when irregularities or fraud are found, it is the bank's duty to submit a completed SAR, notify law enforcement, and notify OCC. After

¹⁷ Due to the nature of OCC's risk-based supervisory approach in identifying possible areas of concerns relating to internal criminal activities at banks, and scope limitations of our review, we did not select a sample of OCC examinations to determine whether expanded procedures were performed.

which time, the bank conducts its own investigation and OCC examiners will follow up with the bank and provide support to the bank.

OCC's Performance of Pre-Employment Screening:

OCC reviews certain banks' hiring processes, including the conduct of pre-employment screenings, depending on the size and complexity of the bank. OCC requires that problem banks with a 3, 4, or 5 composite CAMELS¹⁸ rating have an extensive screening process when hiring new bank officers or directors. For instance, before a bank hires the officer or director, the bank must provide OCC with a 914 packet (notice of intent to hire) on the individual. A further background check is done at the district level. Once this more extensive background check is complete then OCC will hold a consult with legal in Denver to determine if the hire would be a good move for the bank in safe and sound practices, especially if the individual is coming from another troubled bank.

OCC's process is designed to make sure that: (1) the individual is not responsible for the composite rating of the bank he/she is coming from, and (2) the individual is truly fit and qualified for such a position as officer or director. If an individual applies for such a position and is found to have been the reason the failure of the previous bank of employment; OCC will give that individual the option to withdraw his/her application.

¹⁸ CAMELS is an acronym for a bank's performance rating components: Capital adequacy, Asset quality, Management, Earnings, Liquidity, and Sensitivity to market risk. Numerical values range from 1 to 5, with 1 being the highest rating and 5 representing the worst rated banks.

The objectives of our audit were to: (1) identify the extent and nature of criminal and other suspicious activity committed by bank insiders reported to Financial Crimes Enforcement Network (FinCEN) under the Bank Secrecy Act through a review of Suspicious Activity Reports (SARs) and related analytical studies; (2) identify Office of the Comptroller of the Currency (OCC) processes for pursuing enforcement actions against current or former bank insiders for which there is evidence of wrongdoing involving dishonesty, a breach of trust, or money laundering; (3) identify OCC examination procedures to ensure banks have sufficient processes to prevent, detect, and report internal criminal activities; (4) determine whether the procedures are applied; and (5) determine whether deficiencies identified during the examination process result in supervisory actions that are tracked. The scope of our audit ranged from calendar years 2009 through 2011.

We conducted our fieldwork in Washington, D.C. between December 2011 and June 2016, which included the following:

FinCEN

To accomplish objective 1 of this audit, specifically, we

- interviewed the following FinCEN officials: the Assistant Director for the Office of Regulatory Analysis; the Deputy Assistant Director of Data Analysis; and the Audit Liaison;
- reviewed FinCEN's policies and procedures for collecting and sharing SAR data with OCC;
- reviewed FinCEN's revised SAR form to gain an understanding of its content and instructions;
- reviewed a SAR data download from FinCEN for the period of January 2009 – December 2011;
- reviewed FinCEN SAR Stats reports (formerly known as SARs By the Numbers reports), which sorts the number of SARs in various ways based on the categories marked on the SARs when filed by banks;

- reviewed Exhibit 6 - SAR Filings by Primary Federal Regulator, of the FinCEN SAR Stats reports to ascertain the total number of SARs filed by banks, as well as the number of SARs filed by banks whose primary regulators are OCC or the legacy Office of Thrift Supervision (OTS). The exhibit includes the following federal regulators/categories from the SAR form: Federal Reserve Board, Federal Deposit Insurance Corporation, OCC, OTS, National Credit Union Administration; Unspecified, Money Services Businesses (bank form filings), and Office of Foreign Asset Control filings. During 2009–2011, FinCEN received approximately 2.2 million SARs from banks, of which, approximately 1.3 million were filed by banks regulated by OCC or the former OTS; and
- reviewed Exhibit 7 - Relationship to Financial Institution, of the FinCEN SAR Stats reports, to ascertain the number of Institution-Affiliated Party (IAP) relationships identified on the SARs. The exhibit includes the following 13 relationship types/categories: accountant, agent, appraiser, attorney, borrower, broker, customer, director, employee, officer, shareholder, other, and none indicated, for all federal regulators. Multiple relationships to banks are identified on some SARs. This exhibit does not break out these relationships by federal regulators. For the scope of our review, on the approximately 2.2 million total SARs filed, there were approximately 3.9 million relationships identified by banks, of which approximately 53,000 were related to bank directors, employees, and officers.

OCC

To accomplish objectives 2 through 5, specifically, we

- reviewed applicable laws, rules, and regulations that the banks and OCC must follow relating to the prevention, detection, and reporting requirements for criminal activity committed by bank insiders;
- reviewed OCC's policies and procedures, as well as OCC guidance issued to the banks related to the prevention, detection, and reporting requirements for criminal activity committed by bank insiders;

- interviewed a Department of Justice Assistant United States Attorney;
- interviewed the following OCC headquarter officials regarding bank and OCC responsibilities and activities relating to the prevention, detection, and reporting requirements for criminal activity committed by bank insiders: the Director and Special Counsel within the Enforcement and Compliance Division; the Director, former Director, and staff within Operational Risk Policy Division; the Director with the Bank Information Technology Division; the Director, an external fraud specialist, and other officials in the Special Supervision Division; the Fast Track program coordinator; and Assistant Deputy Comptrollers from various field offices (Wichita, Kansas; San Francisco, California; Minneapolis, Minnesota; and Birmingham, Alabama); a District Fraud Expert in the New England District; and OCC's webmaster;
- documented OCC's Fast Track Enforcement Program (Fast Track) processes for identifying suspicious activities relating to bank insiders and for issuing prohibition actions under 12 U.S.C. 1829 and 12 U.S.C. 1818;
- obtained documentation to ascertain the total number of SARs received, the number of IAP relationships reported, and the number of SARs that meet the criteria for pursuing enforcement actions. OCC sorts the SARs based on the following IAP relationships: director, officer, employee, agent, and owner (or controlling shareholder);
- compared the total number of SARs downloaded by OCC to the number received by FinCEN; and
- sampled 45 of 554 Fast Track case files that were extracted from OCC's website, as a test of controls over the documented processes above to determine whether the processes were consistently followed. We used the Government Accountability Office/President's Council on Integrity and Efficiency's *Financial Audit Manual* as criteria for the acceptable number of deviations in sampling control tests to conclude on the results of the statistical sampling test.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix 4
Management Response



Office of the Comptroller of the Currency

Washington, DC 20219

August 29, 2016

Susan Barron
Director, Banking Audits
Office of Inspector General
Department of the Treasury
Washington, DC 20220

Subject: Response to Draft Report

Dear Ms. Barron:

We have reviewed the Treasury Office of the Inspector General (OIG) draft report titled “OCC’s Fast Track Enforcement Program Should Be Assessed.” The audit objective was to: (1) identify the extent and nature of criminal and other suspicious activity committed by bank insiders reported to Financial Crimes Enforcement Network (FinCEN) under the Bank Secrecy Act (BSA) through a review of Suspicious Activity Reports (SARs) and related analytical studies; (2) identify Office of the Comptroller of the Currency (OCC) processes for pursuing enforcement actions against current or former bank insiders for which there is evidence of wrongdoing involving dishonesty, a breach of trust, or money laundering; (3) identify OCC examination procedures to ensure banks have sufficient processes to prevent, detect, and report internal criminal activities; (4) determine whether the procedures are applied; and (5) determine whether deficiencies identified during the examination process result in supervisory actions that are tracked by the OCC.

To accomplish the objectives, the OIG reviewed applicable laws, regulations, policies, procedures, and guidance, as well as related documentation obtained from OCC or FinCEN. The OIG interviewed key OCC officials and staff at the Washington, D.C. headquarters and field offices in Wichita, Kansas; San Francisco, California; Minneapolis, Minnesota; and Birmingham, Alabama. The OIG also interviewed key FinCEN officials in Washington, D.C. The audit scope ranged from calendar years 2009 through 2011 and the OIG conducted fieldwork between December 2011, and June 2016.

The OIG found that OCC’s examination procedures reasonably address the prevention and detection of criminal activities by bank insiders, if performed as warranted during ongoing safety and soundness examinations. Furthermore, OCC’s procedures include tracking of supervisory actions for any deficiencies identified during the examinations.

In addition, the OIG found that OCC’s Fast Track Enforcement Program (Fast Track) implements “streamlined enforcement” procedures aimed at keeping the banking industry safe

Appendix 4
Management Response

and sound by using information from SARs, examinations, alerts, or other sources to pursue prohibitions of bank insiders from working in a financial institution. Further, the OIG indicated that OCC consistently followed the Fast Track policies and procedures. However, the OIG concluded that the last assessment of Fast Track by OCC completed in 2009 did not include the establishment of specific performance metrics or an analysis of staffing levels needed to meet program goals and the program was not as efficient and effective in pursuing prohibitions as it could be.

The report recommends that OCC assess Fast Track to determine whether the program's efficiency and effectiveness can be increased. In addition, the assessment should include the program's purpose and goals, comprehensive requirements, performance results over time, current staffing levels, and additional training needs. We agree.

The OCC will assess Fast Track to determine whether it is feasible to improve the program's efficiency and effectiveness to include processing more 1818 prohibition cases. We will complete the assessment by September 30, 2016.

If you need additional information, please contact Amy Friend, Senior Deputy Comptroller and Chief Counsel, at 202-649-5276.

Sincerely,

/s/

Thomas J. Curry
Comptroller of the Currency

Appendix 5
Major Contributors to This Report

Fawntrella Thompson, Auditor-in-Charge
Jeremy Spears, Auditor
Kiira Hall, Referencer

The Department of the Treasury

Deputy Secretary
Office of Strategic Planning and Performance Improvement
Office of the Deputy Chief Financial Officer, Risk and Control
Group

Office of the Comptroller of the Currency

Comptroller of the Currency
Liaison Officer

Financial Crimes Enforcement Network

Director
Liaison Officer

Office of Management and Budget

Office of Inspector General Budget Examiner

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