



OFFICE OF INSPECTOR GENERAL
OFFICE OF INVESTIGATIONS

REPORT OF INVESTIGATION

CASE TITLE: Former Special Agents Rachel Ondrik and Kirk Yamatani, U.S. Department of Commerce (DOC) Office of Inspector General (OIG) Travel Voucher and Time & Attendance Fraud	FILE NUMBER: PPC-CI-12-0236-X
	TYPE OF REPORT <input type="checkbox"/> Interim <input checked="" type="checkbox"/> Final

BASIS FOR INVESTIGATION

In 2009, former DOC OIG Special Agents Kirk Yamatani and Rachel Ondrik transferred from the DOC OIG Regional Office in Atlanta, GA to the DOC OIG Headquarters Office in Washington, DC on a government-paid transfer. Subsequent to their transfers, they alleged that they were reimbursed less money for their temporary quarters expenses than they were promised. In 2011, during the OIG research into their allegation, evidence was found that both Yamatani and Ondrik knew they were authorized reimbursement for a lower amount than they claimed on their vouchers, yet they never relented in their assertions that the government owed them the higher amount. The evidence found was an email exchange between Yamatani and Ondrik on May 6, 2009. The discovery of this email resulted in an Administrative Investigation being opened in September 2011 to further investigate what transpired before and after the transfers. The U.S. Attorney's Office for the District of Maryland was briefed on the contents of the May 6 email, but declined to pursue potential criminal prosecution at that time. (Attachments 1 and 2)

RESULTS / SUMMARY OF INVESTIGATION

In the fall of 2011, during the course of the Administrative Investigation, evidence was found that showed additional fraudulent vouchers, false statements and time and attendance violations

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were committed by both individuals during and after their transfer to Washington, DC. In December 2011, the new evidence was briefed to the U.S. Attorney's Office for the District of Maryland, Southern Division, Greenbelt, MD. The case was officially authorized by the U.S. Attorney's Office on January 10, 2012. Yamatani and Ondrik were notified of this authorization on January 11 and [REDACTED]

[REDACTED]

(Attachments 3 and 4)

Our investigation, conducted in collaboration with the FBI, confirmed multiple instances of fraud and false statements to the government by both Ondrik and Yamatani occurring between May 2009 and [REDACTED] 2012.

Our investigation found that Yamatani and Ondrik each knowingly submitted [REDACTED] fraudulent vouchers in conjunction with their government-paid move in 2009. These [REDACTED] vouchers were a Temporary Quarters Subsistence Expenses (TQSE) voucher, a Househunting voucher, an En Route voucher [REDACTED]

Furthermore, the investigation showed that during the time period of March 2010 through [REDACTED] 2012, in addition to submitting these fraudulent vouchers, both Ondrik and Yamatani affirmed their time and attendance (T&A) records in Web TA¹ for a combined total of at least [REDACTED] workdays when they knew that the T&A records were fraudulent.

These fraudulent vouchers and T&A records documented the theft of approximately \$ [REDACTED] by Ondrik and approximately \$ [REDACTED] by Yamatani. The amounts they [REDACTED]. If the [REDACTED] relocation vouchers that each one submitted had been processed and paid in the amounts requested, Ondrik would have succeeded in fraudulently receiving an additional \$ [REDACTED] and Yamatani would have succeeded in fraudulently receiving an additional \$ [REDACTED]. The submission of known false vouchers and the affirming of false Web TA records constituted violations of [REDACTED]. Furthermore, the evidence showed that Yamatani and Ondrik violated [REDACTED]

On March 28, 2013, both Yamatani and Ondrik entered into a plea agreement with the U.S. Attorney's Office. As part of their plea agreement, they resigned as special agents with the DOC OIG on March 29, 2013. Furthermore, [REDACTED]

[REDACTED] They each agreed to pay a fine of \$28,000 and restitution of \$14,000. These amounts were agreed upon through negotiations between the U.S. Attorney's Office and the attorneys [REDACTED]

¹ Web TA is a web-based system used to record Time and Attendance at DOC OIG. It is verified and affirmed to by each IG employee at the end of each pay period.

representing Yamatani and Ondrik. A criminal information was filed on March 29, 2013, charging both Yamatani and Ondrik with 18 U.S.C. § 1018 – Submission of False Official Writing. (Attachments 5 through 12)

On April 30, 2013, Yamatani and Ondrik pled guilty in U.S. District Court, Greenbelt, MD, to submitting false claims for relocation and time and attendance fraud. (Attachment 13)

In separate sentencing hearings held on June 19, 2013, in the U.S. District Court in Maryland, Yamatani and Ondrik were each sentenced to 8 months in Federal prison, monetary penalty of \$42,000 (fine plus restitution), and 1 year supervised probation. Both Yamatani and Ondrik appealed their sentence. (Attachments 14 and 15)

On September 4, 2013, their appeals were heard in the U.S. District Court in Maryland. The presiding judge denied their appeals but found they had not been properly advised of their rights at the sentencing hearing. He, therefore, found that they would need to plead again and be resentenced by him. Yamatani and Ondrik both decided to withdraw their pleas.

After several months of negotiating for a new plea bargain, a deal was reached and on May 13, 2014, Yamatani and Ondrik each plead guilty to a Superseding Criminal Information which charged them with submission of a false official writing by an officer of the United States, in violation of 18 U.S.C. § 1018, a Class A misdemeanor. On June 30, 2014, they were sentenced to a fine of \$20,000 each, restitution of \$11,150.21 for Yamatani and \$9,598.66 for Ondrik, 6 days in custody (time previously served), supervised release for 1 year, and 60 hours of community service for a charity for which they do not currently volunteer. (Attachments 184 through 188)

During the course of the investigation, while

METHODOLOGY

This case was conducted through interviews and document review, including a review of government email accounts, personal email accounts,² government travel vouchers, government time and attendance records and personal and government cell phone statements. Additionally, documents obtained through Inspector General Subpoenas were also reviewed and analyzed during the investigation. These included [REDACTED] and [REDACTED].

DETAILS OF INVESTIGATION

Fraudulent Temporary Quarters Subsistence Expenses (TQSE) Vouchers

Actual and Fixed Methods of TQSE Reimbursement:

The Federal Travel Regulations (FTR) (41 C.F.R. Part 302-6) define Temporary Quarters Subsistence Expenses (TQSE) as subsistence expenses incurred by an employee and/or his/her immediate family while occupying temporary quarters. TQSE does not include local transportation expenses incurred during occupancy of temporary quarters. According to the FTR, an agency can use one of two methods to reimburse an employee for TQSE. The two methods are:

I. Actual Method:

- a. The employee must document his TQSE by itemizing each expense and providing receipts as required.
- b. The employee is authorized to claim TQSE in increments of 30 days or less, not to exceed 60 consecutive days. However, if the employee has a compelling reason that requires he stay in temporary quarters, the agency can authorize an extension of up to 60 additional consecutive days.
- c. The maximum allowable amount is determined by multiplying the number of days the employee incurs TQSE by the maximum daily amount.
 - i. The maximum daily amount is determined by multiplying the "Standard" Continental United States (CONUS) per diem rate by an Actual Rate Method multiplier. The multiplier is:
 1. Employee: First 30 days of TQSE is "1". Additional days of TQSE is "0.75".

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2. Spouse or any other family members over the age of 12: First 30 days of TQSE is "0.75". Additional days of TQSE is "0.5".
3. Family members under the age of 12: First 30 days of TQSE is "0.5". Additional days of TQSE is "0.4".

2. Fixed Method:

- a. The employee does not have to document his TQSE by itemizing each expense or provide receipts.
- b. The employee is paid a fixed amount for up to a maximum of 30 days. No extensions are allowed under the fixed amount method.
- c. The maximum allowable amount is determined by multiplying the number of days authorized by the agency (maximum of 30) by the maximum daily amount.
 - i. The maximum daily amount is determined by multiplying the "Locality" per diem rate for the new duty station by a Fixed Rate Method multiplier. The multiplier is:
 1. Employee: 0.75.
 2. Spouse and other family members: 0.25.

Submission of Fraudulent Vouchers for Reimbursement of TQSE:

Our investigation found that Yamatani and Ondrik each submitted a travel voucher for reimbursement of TQSE expenses of 50 days³ using the fixed method when they knew that the fixed method only permitted 30 days of reimbursement. Furthermore, they both used the higher actual method multiplier in their calculations instead of the fixed method multiplier. The two actions resulted in their TQSE reimbursement requested being approximately 3 times what they were authorized. Yamatani's TQSE voucher requested a reimbursement of \$31,185.50 when he was only authorized \$11,889.00. Ondrik's TQSE voucher requested a reimbursement of \$33,973.50 when she was only authorized \$10,815.00. (Attachments 16, 17, and 18)

Yamatani's Permanent Change of Station (PCS) travel orders were signed and approved on May 1, 2009, by DOC OIG [REDACTED].
On May 4, 2009, Yamatani sent an email to [REDACTED].

³ Both Yamatani and Ondrik took a 10-day house hunting trip. If they had used the actual method of reimbursement, they would have to subtract the 10 days from the 60 days of authorized TQSE.

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Our
 investigation found

Ondrik's PCS travel orders were signed and approved on July 17, 2009, by [REDACTED]. Both Yamatani and Ondrik were authorized by OIG management officials to utilize the fixed method of reimbursement for their move. (Attachments 19 through 22)

On Wednesday, May 6, 2009, at 9:19 a.m., Ondrik sent an email – subject of “Potential Bad News” – to Yamatani stating, “Maybe I’m reading this wrong.... but based on reading these regulations that you sent me, you can only get the fixed amount for 30 days. If you want to do the 120 day option, you have to provide receipts and be reimbursed for actual expenses. They can advance monies at 30 day increments up to 120 days, but you have to prove that you actually spent the funds. (Of course if they don’t know this, you still win.)” And, “Hope this doesn’t freak you out as much as it does me, but I thought I should be honest so you can have a discussion with [REDACTED] and plan accordingly. Maybe [REDACTED] or [REDACTED] knows some way around it. I have pasted the most relevant regulations below, so that you don’t have to read through the whole thing again. I will keep looking for loopholes. I am going to start searching the internet.” Ondrik cut and pasted excerpts from the FTR regarding the TQSE fixed and actual methods of reimbursement. She pasted them out of order, with the first one being the regulation stating that the fixed method can be paid for up to a maximum of 30 days, with no extensions allowed.

Yamatani responded to Ondrik at 9:35 a.m. on the same day, stating in part, “The fixed amount for the first two 30 day increments will be no problem. Hopefully, we’ll have a contract by then. If not, I’ll go over the reg[ulation]s with [REDACTED] and do whatever [REDACTED] thinks he needs to justify an additional 60 days. I doubt they realize it has to be actual.”

Yamatani’s response gave the appearance that he did not understand the contents of her earlier email because he still referred to “the first two 30 day increments”. At 9:47 a.m., Ondrik replied, “The issue is you can’t mix the two and you can’t do the fixed amount in two 30 day increments. Technically, if you take the first 30 day fixed reimbursement, you can’t get any more TOSE AT ALL (ACTUAL OR FIXED). According to the GSA website you cannot extend it another 30 days unless you are already doing the actual method.”

At 9:55 a.m., Yamatani responded stating, in part, “OK. I don’t think they know this nor care though. If they did, it would have been raised already. [REDACTED] is the bottom line for us with this, and [REDACTED] sent me confirmation that the fixed method for all temp housing and househunting costs was fine. [REDACTED] also has not raised anything like this. If for some reason it becomes an issue down the road they will be obligated to fix it and I’m sure they’ll do so.”

Ondrik responded at 9:58 a.m. She stated, “They definitely don’t know this. There’s no way [REDACTED] would sign up for going against the GSA reg[ulation]s.” Two minutes later at 10:00 a.m.,

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Yamatani responded and said, "Well let's not suggest there's a problem..... this is already in motion." (Attachment 23)

Our investigation found that, subsequent to this email conversation:

- On July 27, 2009, Yamatani submitted a voucher for reimbursement of 50 days of TQSE calculated using the fixed method of reimbursement – for the period June 6, 2009 through July 26, 2009 – for a total amount of \$31,185.50. The voucher was approved by [REDACTED] on July 28, 2009 and processed/paid by the [REDACTED] Office, Finance Division of the National Institute of Science and Technology (NIST), Gaithersburg, MD, on August 20, 2009. NIST authorized payment of \$28,076.06, which was \$31,185.50 minus \$3,109.04, the outstanding amount remaining from an advance payment that Yamatani had previously received for his move. On August 20, 2009, Yamatani received an email stating that his payment of \$28,076.06 was being electronically sent to his financial institution within 2 to 3 business days. (Attachments 24 and 25)
- On September 26, 2009, Ondrik submitted a voucher for reimbursement of 50 days of TQSE calculated using the fixed method of reimbursement – for the period August 7, 2009 through September 25, 2009 – for a total amount of \$33,973.50. The voucher was approved by [REDACTED] on September 26, 2009, and forwarded to the [REDACTED] Office, NIST Finance Division for processing. NIST processed Ondrik's voucher on November 19, 2009, and notified Ondrik that since her TQSE was authorized for the fixed method of reimbursement, she was authorized only \$10,815.00, which was the amount they calculated for 30 days of TQSE. Also, on November 19, NIST informed her that she would be paid \$8,638.11, which is \$10,815.00 minus \$2,176.89, the outstanding amount remaining from an advance payment that Ondrik had previously received for her move. (Attachments 26 and 27)

- [REDACTED] his TQSE and found that he was only authorized \$11,889.00. On February 23, 2010, the overpayment of \$ [REDACTED] was recouped by NIST. NIST notified Yamatani on February 24 that due to a previous overpayment, the \$ [REDACTED] would be withheld from a [REDACTED] voucher they had processed for him that month. Yamatani emailed [REDACTED]

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[REDACTED]
(Attachments 28, 29, and 30)

Interviews of OIG Managers:

[REDACTED] DOC OIG [REDACTED]
[REDACTED] was interviewed by the FBI on [REDACTED] and provided the following information:

- [REDACTED]
 - [REDACTED]
- [REDACTED] (Attachment 31)

[REDACTED] DOC OIG [REDACTED]
[REDACTED] was interviewed by the FBI on [REDACTED] and provided the following information:

- [REDACTED]
 - [REDACTED]
 - [REDACTED]
- [REDACTED] (Attachment 32)

[REDACTED] DOC OIG [REDACTED] was interviewed by the FBI on [REDACTED]
[REDACTED] and provided the following information:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED] (Attachment 33)

[REDACTED] DOC OIG [REDACTED]
[REDACTED] was interviewed by the FBI on [REDACTED] and provided the following information:

- [REDACTED]
- [REDACTED]
- [REDACTED] (Attachment 34)

Interviews of NIST Personnel:

[REDACTED] NIST Finance Division, [REDACTED] Office: [REDACTED] was interviewed by DOC OIG on [REDACTED]
[REDACTED]

[REDACTED] (Attachment 35)

[REDACTED] NIST Finance Division/ [REDACTED] Office:
was interviewed by DOC OIG on [REDACTED]
[REDACTED]
[REDACTED] (Attachment 36)

Claim of Not Receiving TQSE Payments as Promised:

After Ondrik was disapproved for the reimbursement of 50 days of fixed TQSE and then Yamatani's overpayment was recouped by NIST, they both complained to their OIG management alleging they were not paid as promised and asked for assistance in obtaining the funds they felt were rightfully theirs. We found [REDACTED]

[REDACTED]

[REDACTED] (Attachment 31)

[REDACTED]

[REDACTED]
(Attachment 32)

[REDACTED]
(Attachments 23, 37 through 61)

Fraudulent Househunting Vouchers

Both Yamatani and Ondrik were authorized a 10-day househunting trip on their transfer orders. The FTR Part 302-5 defines a househunting trip as "a trip made by the employee and/or spouse to the new official station locality to find permanent living quarters to rent or purchase." The FTR eligibility requirements for reimbursement of househunting trip expenses include:

- The agency authorized the employee to perform a househunting trip in advance of the travel; and
- The agency has established, and informed the employee of, the date the employee is to report to the new official station.

Additionally, the FTR Part 302-5 states that an employee is in an official duty status while on a househunting trip. Therefore, the employee is required to be performing duties associated with househunting on each workday while under official orders to seek housing in the new locality.

Our investigation found that Yamatani and Ondrik [REDACTED]

[REDACTED] Furthermore, we found that the househunting vouchers submitted by both Yamatani and Ondrik were fraudulent in that they did not take the trips as indicated on their voucher. We also found that [REDACTED]

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Househunting Trip – Yamatani:

Our investigation found that Yamatani provided his supervisors false information regarding his whereabouts and activities between May 29 and June 7, 2009, and submitted a fraudulent travel voucher for a househunting trip that he did not take. [REDACTED]

[REDACTED]. On July 27, 2009, Yamatani was reimbursed \$3,232.64 for the fraudulent travel voucher.

[REDACTED]

(Attachments 62 –

67)

On [REDACTED] Yamatani sent an email [REDACTED]

[REDACTED]

(Attachment

68)

On June 10, 2009, Yamatani submitted a travel voucher claiming he and his [REDACTED] traveled from [REDACTED] GA to the Washington DC area to conduct househunting activities. His voucher claimed he and his [REDACTED] departed [REDACTED] GA at 6:00 a.m. on Thursday, May 28, 2009, and arrived in Ashburn, VA at 4:00 p.m. that same day. The voucher indicated they remained in the Washington, DC area until Saturday, June 6, 2009, when they departed Ashburn, VA at 6:00 a.m. and arrived in [REDACTED] GA at 4:00 p.m. The information he claimed on his voucher conflicts with the evidence obtained during this investigation.

(Attachment 69)

Our investigation found that Yamatani [REDACTED]

[REDACTED]

(Attachment 70)

⁴ All time and attendance fraudulent amounts include gross pay and Law Enforcement Availability Pay (LEAP).

Further, we found [REDACTED]

[REDACTED]

(Attachments 71 through 74)

[REDACTED]

[REDACTED]

(Attachments 74 through 77)

Househunting Trip – Ondrik:

Our investigation found that Ondrik, like Yamatani, provided her supervisors false information regarding her whereabouts and activities between July 22 and July 31, 2009, and submitted a fraudulent travel voucher for a househunting trip that she did not take.

[REDACTED]

On September 10, 2009, Ondrik was reimbursed \$4,058.75 for the fraudulent travel voucher.

We found that [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(Attachments 78 through 83)

[REDACTED]

(Attachment 84)

On August 20, 2009, Ondrik submitted a travel voucher claiming she and her [REDACTED] traveled from Acworth, GA to Rockville, MD on Wednesday, July 22, 2009, for househunting. Her voucher claimed she and her [REDACTED] departed Acworth at 6:00 a.m. and arrived in Rockville at 7:30 p.m. The voucher stated that they remained in the Washington, DC area until Friday, July 31, 2009, when they departed Rockville at 6:00 a.m. and arrived in Acworth at 8:00 p.m. The information she claimed on her voucher conflicts with the evidence obtained during this investigation. (Attachment 85)

[REDACTED]

(Attachments 86 through 90)

Fraudulent En Route Vouchers

En Route Voucher – Yamatani:

Our investigation found that Yamatani submitted a fraudulent en route travel voucher on June 10, 2009. In it, he falsely claimed that he, his [REDACTED] and [REDACTED] traveled from [REDACTED] GA to Ashburn, VA on Sunday, June 7, 2009, departing at 12:00 p.m. and arriving at 10:00 p.m. The amount claimed on the voucher was \$1,531.07. On July 28, 2009, Yamatani was authorized a reimbursement of \$1,157.92. [REDACTED]

[REDACTED]

(Attachment 91)

[REDACTED]

(Attachment 92)

En Route Voucher – Ondrik:

[REDACTED]

(Attachment 93)

We found that Ondrik submitted a fraudulent en route travel voucher on August 10, 2009. She falsely claimed that she, her [REDACTED] and [REDACTED] left Acworth, GA on Wednesday, August 5, 2009, at 8:00 a.m. and arrived in Roanoke, VA at 5:00 p.m. Furthermore, she claimed that they stayed in [REDACTED] Roanoke that night, departed the next morning at 9:00 a.m. and arrived in Clarksburg, MD at 2:00 p.m. on Thursday, August 6. The amount claimed on the voucher was \$1,515.38. On September 22, 2009, Ondrik was authorized a reimbursement of \$1,264.36.

[REDACTED]
(Attachment 94)

[REDACTED]

(Attachments 84, 95 through 97)

[REDACTED]

(Attachments 98 and 99)

[REDACTED]

(Attachment

100)

[REDACTED]

[REDACTED] Yamatani:

Our investigation found that Yamatani [REDACTED]

[REDACTED]

(Attachment 101)

We found that [REDACTED]

[REDACTED]

(Attachment 102)

We found that [REDACTED]

[REDACTED]

(Attachments 103)

[REDACTED]

(Attachment 104)

We determined that [REDACTED]

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[REDACTED]
and 106)

(Attachments 105

[REDACTED]
(Attachment 107)

[REDACTED]
(Attachments 108 through 110)

[REDACTED]
(Attachments 111 through 113)

[REDACTED] Ondrik:

We found that Ondrik [REDACTED]

[REDACTED]
(Attachment 114)

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[REDACTED]

(Attachments 115 through 118)

[REDACTED]

(Attachment 93)

[REDACTED]

Attachment 119)

We found that

[REDACTED]

(Attachments 120

and 121)

[REDACTED]

(Attachment 107)

[REDACTED]

[REDACTED] (Attachment 122)

[REDACTED] (Attachments 123 through 125)

Other Time and Attendance Violations

Our investigation found multiple instances between [REDACTED] 2010 and [REDACTED] 2012 in which Yamatani and/or Ondrik committed time and attendance violations by validating their Time and Attendance records to DOC OIG certifying they were in a duty status when evidence showed [REDACTED] they traveled out of the working area without authorization during working hours. We found evidence of [REDACTED] separate instances, covering [REDACTED] workdays. Attachments 126 through 170)

The estimated salary total for Yamatani and Ondrik that they fraudulently received for the [REDACTED] time and attendance violations was approximately \$ [REDACTED] for Yamatani and approximately \$ [REDACTED] for Ondrik.

Although not listed on the list of instances, we found [REDACTED]

1. [REDACTED] (Attachments 171 through 173)

2. [REDACTED] (Attachments 174 and 175)

[REDACTED]

[REDACTED]

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[REDACTED]

We found

(Attachments 176 and 177)

[REDACTED]

[REDACTED]

(Attachments 178 and 179)

[REDACTED]

(Attachment 180)

We found that

[REDACTED]

[REDACTED]
(Attachment 181 and 182)

Further, we found that [REDACTED]
[REDACTED]
(Attachment 183)

[REDACTED]

We found that [REDACTED]
[REDACTED]

[REDACTED]

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121	[REDACTED]	
122	[REDACTED]	
123	[REDACTED]	
124	[REDACTED]	
125	[REDACTED]	
126	Summary of T&A Fraud Involving [REDACTED] – prepared by [REDACTED]	
127	[REDACTED]	
128	Ondrik Web TA Records for 3/14 thru 3/27/10	
129	[REDACTED]	
130	Ondrik Web TA Records for 4/25 thru 5/8/10	
131	[REDACTED]	
132	Yamatani Web TA Records for 6/6 thru 6/19/10	
133	[REDACTED]	
134	Ondrik Web TA Records for 6/20 thru 7/3/10	
135	[REDACTED]	
136	Ondrik Web TA Records for 6/20 thru 7/3/10	
137	[REDACTED]	
138	[REDACTED]	
139	Yamatani Web TA Records for 8/1 thru 8/14/10	
140	[REDACTED]	
141	Ondrik Web TA Records for 9/12 thru 9/25/10	
142	[REDACTED]	
143	Yamatani Web TA Records for 9/26 thru 10/9/10	
144	[REDACTED]	
145	Ondrik Web TA Records for 11/7 thru 11/20/10	
146	[REDACTED]	
147	Ondrik Web TA Records for 12/19/10 thru 1/1/11	
148	[REDACTED]	
149	Ondrik Web TA Records for 3/13 thru 3/26/11	
150	[REDACTED]	
151	Yamatani Web TA Records for 4/24 thru 5/7/11	
152	[REDACTED]	
153	Ondrik Web TA Records for 6/19 thru 7/2/11	
154	[REDACTED]	
155	[REDACTED]	
156	Ondrik Web TA Records for 11/6 thru 11/19/11	
157	[REDACTED]	

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Attachment	Description	IG-CIRTS Serial Index
158	[REDACTED]	
159	Ondrik Web TA Records for 2/12 thru 2/25/12	
160	Yamatani Web TA Records for 2/12 thru 2/25/12	
161	[REDACTED]	
162	[REDACTED]	
163	[REDACTED]	
164	[REDACTED]	
165	[REDACTED]	
166	[REDACTED]	
167	Yamatani Web TA Records for 2/26 thru 3/10/12	
168	Ondrik Web TA Records for 2/26 thru 3/10/12	
169	[REDACTED]	
170	[REDACTED]	
171	[REDACTED]	
172	[REDACTED]	
173	[REDACTED]	
174	[REDACTED]	
175	[REDACTED]	
176	[REDACTED]	
177	[REDACTED]	
178	[REDACTED]	
179	[REDACTED]	
180	[REDACTED]	
181	[REDACTED]	
182	[REDACTED]	
183	[REDACTED]	
184	Yamatani Plea Agreement dated May 9, 2014	
185	Ondrik Plea Agreement dated May 9, 2014	
186	U.S. District Court – District of MD – judgment in a criminal case – Yamatani – dated 6/30/14	
187	U.S. District Court – District of MD – judgment in a criminal case – Ondrik – dated 6/30/14	
188	Transcript of Sentencing Hearing conducted on 6/30/14	

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