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REPORT OF INVESTIGATION

Case Title: [REDACTED]; [REDACTED] and [REDACTED],
Vidoori Consulting Services; 2030 Census

Case Number: 24-0595

Subject(s): [REDACTED] (U.S. Census Bureau)

Applicable Statutes or Policies:

- 5 C.F.R. § 2635.702 – Use of public office for private gain
- U.S. Census Bureau Summary of Ethics Rules (2022)

Distribution:	Census
<div style="background-color: black; height: 40px; width: 100%;"></div> <p>Signature of Case Agent: [REDACTED] Investigator</p>	<div style="background-color: black; height: 40px; width: 100%;"></div> <p>Signature of Approving Official: [REDACTED] Investigator</p>

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**Controlled by: U.S. Department of Commerce, Office of Inspector General
1401 Constitution Avenue NW, Washington, DC 20230**

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OIG investigated allegations that two senior-level U.S. Census Bureau employees were engaged in activities to ensure a certain contractor would win the contract for 2030 census IT support and that one of those employees was promised a job with the contractor upon retirement.

While investigating those allegations, OIG uncovered evidence that another bureau employee was in a romantic relationship with [REDACTED] of the contracting company. OIG assessed whether [REDACTED] created the appearance of a conflict of interest and misused [REDACTED] public office for private gain by being actively involved in the oversight of the contract awarded to the company of [REDACTED] live-in [REDACTED] [REDACTED]

What OIG Found

OIG found that the employee maintained a romantic relationship with [REDACTED] of a Census contractor. Further, OIG found that, in [REDACTED] official government role, the employee worked with and oversaw employees from the company and helped evaluate their performance on the contract. The employee performed this work while teleworking from the contractor's personal home. The employee has been employed by the federal government for a cumulative total of [REDACTED] out of the last [REDACTED]. During that time period, the contractor has received over \$42 million in government contracts from the bureau.

Regarding the initial allegation, OIG found no evidence that two bureau employees engaged in activities to ensure a particular contract would be awarded to a particular contractor and that one of the employees was promised a job with that contractor.

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BASIS FOR INVESTIGATION

On April 10, 2024, the U.S. Department of Commerce's Office of Inspector General (OIG), Washington, DC, received an anonymous hotline complaint alleging that U.S. Census Bureau employees [REDACTED] and [REDACTED] engaged in activities to ensure Vidoori Consulting Services would be aligned to win the upcoming IT support contract in preparation for the 2030 census. The complaint also alleged that [REDACTED] was maintaining employment with the bureau until Vidoori won the large-scale IT support contract, and then [REDACTED] would retire and work for Vidoori.

While investigating the allegations surrounding [REDACTED] and [REDACTED] OIG uncovered evidence that bureau employee [REDACTED] was in a romantic relationship with Vidoori's [REDACTED] (Exhibit 1-2).

BACKGROUND

According to its website, Vidoori is a consulting firm that provides IT services and products to government and commercial clients. Since 2019, Vidoori has received over \$42 million in government contracts from the bureau. In 2024, Vidoori was awarded an IT support for e-testing contract for the 2030 census.

[REDACTED] and [REDACTED] began dating in either [REDACTED] or [REDACTED] and were [REDACTED]. They live together in a house that [REDACTED] owns.

[REDACTED] was a bureau employee from [REDACTED] to [REDACTED]. [REDACTED] then became a contractor for Vidoori and continued to support the bureau. [REDACTED] returned to federal service in [REDACTED]. In [REDACTED] current role as [REDACTED] a large portion of [REDACTED] responsibilities include [REDACTED].

[REDACTED] during the time period in question was [REDACTED] who at the time was the bureau's [REDACTED]. While in this role, [REDACTED] was responsible for [REDACTED] to support the decennial census. [REDACTED] to return to federal service with knowledge of [REDACTED] personal relationship with [REDACTED]

[REDACTED] was [REDACTED] who at the time was the bureau's [REDACTED]. While in this role, [REDACTED] was responsible for [REDACTED]

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██████████ to support the decennial census. ██████████ was aware of the personal relationship between ██████████ and ██████████ when ██████████ wanted to bring ██████████ onboard.

INVESTIGATIVE FINDINGS

We found no evidence that supports the allegation that ██████████ and ██████████ engaged in activities to ensure Vidoori would be aligned to win the IT support contract for the 2030 census or that ██████████ was planning to work for Vidoori upon retirement. This finding is based on a review of documentary evidence and interviews with current and former bureau employees.

We found that ██████████ created an appearance of a conflict of interest and misused ██████████ public office for personal gain by overseeing Vidoori employees in ██████████ government role and reviewing invoices Vidoori submitted to the bureau. We discuss this finding below in more detail.

██████████ Conflict of Interest and Misuse of Public Office

According to 5 C.F.R. § 2635.702, an employee may not use their public office for their own private gain.

U.S. Census Bureau ethics rules state that employees shall avoid any actions creating the appearance that they are violating the law or ethical standards. This shall be determined from the perspective of a reasonable person with knowledge of the relevant facts.

Interview of ██████████ (Exhibit 12)

OIG interviewed ██████████ who was ██████████ ██████████ ██████████ acknowledged that ██████████ was aware that ██████████ and ██████████ had a romantic relationship. When asked if it would be a problem if ██████████ and ██████████ lived in the same house while ██████████ was teleworking for the bureau, ██████████ said that as long as they were working in separate spaces, ██████████ did not see a problem with it. ██████████ explained that ██████████ telework agreement was supposed to include a note that ██████████ was to work in a separate space within the house and with a locked door.

██████████ said that ██████████ has ██████████ contractors from both Vidoori and Imagine, Believe, Realize (IBR). The ██████████ of these contractors includes ██████████ ██████████ ██████████ standards for the contractor employees that ██████████, including Vidoori employees, and ██████████ relating to the Vidoori contract.

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██████████ said that ██████████ has only one federal employee, plus contractors from Vidoori and IBR who perform team functions as well. ██████████ said ██████████ ██████████ the monthly status reports (MSRs) submitted by Vidoori and IBR, which show the hours that employees worked and contain a summary of what they worked on. ██████████ said that sometimes ██████████ would push back on the MSRs and ask the contractors to further spell out the work on some of the tasks.

██████████ said that when ██████████ wanted to bring ██████████ on board, ██████████ reached out to ██████████, for advice because ██████████ was aware of the romantic relationship between ██████████ and ██████████ (see document review below). ██████████ said that ██████████ had nothing to do with the awarding of the contract.

When asked whether, as ██████████ ██████████ ██████████ had any issue with ██████████ reviewing the MSRs of the company ██████████ ██████████ ██████████ said:

I haven't, when ██████████ that was something that I had more recently become aware of, I have a relationship with ██████████ having worked with ██████████ for a long time prior to that, so I know the work that ██████████ can do, ██████████ a very good employee and I was forthcoming when I wanted to ██████████ with the HR, with our contracts folks that this was the situation and as I understood it, I made sure that was known and on the table when ██████████, that was not something like I picked ██████████ up and didn't reveal that, I made sure that everyone was in the know about that because I knew that could obviously be a conflict, but I also know ██████████ and ██████████ capabilities, and ██████████ a very good employee, and for me, I didn't want to miss out on the opportunity to bring ██████████ in.

██████████ was asked whether ██████████ would have access to any documents that could assist Vidoori. ██████████ explained that as a federal employee, ██████████ has access to federal documentation on SharePoint. ██████████ said, "From a federal perspective, ██████████ probably has access to the SharePoint sites where some of that documentation sits but so do all the other federal employees that work with those contractors."

When asked whether this information could help Vidoori, ██████████ said, "Yes, like all the other contracts, contractors should not have access to that information." ██████████ further said, "It could help, yeah I guess any contractor, I mean they're all in the same situation, they shouldn't have access to that information, and most of the high-level stuff that we write, we're planning to release, but there are a couple of things that we don't, so it could potentially help them." ██████████ explained that ██████████ has access to sensitive contract information but also has instructions that ██████████ cannot share it. ██████████ said an example of one of these documents would be the 2030 census operational plan.

Interview of ██████████ (Exhibit 19)

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OIG interviewed ██████ who acknowledged that ██████ was aware of the relationship between ██████ and ██████ said ██████ had known ██████ for a long time, and when ██████ wanted to hire ██████ as a federal employee, ██████ brought to ██████ attention that ██████ and ██████ had a personal relationship and that ██████ could not participate in matters related to Vidoori.

██████ said that ██████ ██████ ██████ to go to ██████ to get advice. ██████ said ██████ did not want there to be any perception that ██████ had insider knowledge. ██████ explained that ██████ role would involve working with contractors on the Vidoori contract post-award but also said that ██████ had no knowledge of ██████ reviewing invoices. ██████ said ██████ was aware that ██████ was teleworking from the residence of Vidoori's ██████ ██████ recalled discussions about that and believed the conclusion was that ██████ had to work in a separate office with a door that could be locked.

██████ explained that the pre-award documents on SharePoint would be password-protected files and only authorized personnel, like ██████ and ██████ would have access to them. ██████ did not believe that ██████ had access to pre-award documents such as the statement of work and the technical requirements. Once an award is in the post-award stage, contractors and employees have access to the SharePoint sites in order to collaborate. ██████ said ██████ told ██████ that ██████ could not work on pre-award activities for IT contracts related to the 2030 census. ██████ said ██████ did not want to create the perception that ██████ was privy to pre-award information.

Interview of ██████ (Exhibit 18)

OIG interviewed ██████ who recalled ██████ coming to ██████ regarding ██████ former business and personal relationships with a contractor. ██████ recalled conversations about the perception of ██████ evaluating that company's performance. ██████ explained that the conversation was about not having ██████ be a part of the team that oversees the contractor, because perception can lead to bid protests. ██████ wanted to limit the bureau's exposure.

When asked if it would be an issue if ██████ was teleworking at the contractor's home, ██████ said ██████ wasn't sure. ██████ explained that the Census ██████ was closed until ██████ and everyone was teleworking full time until ██████. ██████ said that as long as ██████ was abiding by the address stated in ██████ telework policy then ██████ teleworking from that address would be permissible. ██████ also said that you could not exclude someone from teleworking because they are ██████ to a certain person.

██████ said that ██████ was not actually evaluating contractor performance because ██████ was not an approving official and was only reviewing invoices. ██████ said that while they were trying to avoid ██████ evaluating the performance of the contract, ██████ did not necessarily consider that to be a problem, but reiterated ██████ was not told ██████ was doing that.

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When asked if it would be an issue if [REDACTED] was reviewing Vidoori invoices while maintaining a personal relationship with, and teleworking at, the residence of Vidoori's [REDACTED] [REDACTED] said that [REDACTED] would have to speak with Acquisitions to check if there was a pre-approval, and [REDACTED] would also have to ask [REDACTED] [REDACTED]

OIG asked [REDACTED] what the process would be for payment after [REDACTED] reviewed the invoices. [REDACTED] confirmed that if [REDACTED] was reviewing the invoices, they would go from [REDACTED] to [REDACTED] who was the [REDACTED], and then to the respective Contracting Officer's Representative for payment.

Document Reviews

On April 6, 2023, [REDACTED] emailed [REDACTED] a draft of an email to send to [REDACTED] (Exhibit 13), which said:

I am documenting our discussion about working with contractors and government personnel being vigilant to avoid conflicts between their official duties and personal interests and must avoid creating any appearance of endorsement or preferential treatment. Per our discussion, you will escalate any potential conflict of interest with any current or future contracts. We ensure you are not involved with any contract activities involving your former employers and that you recuse yourself from any actions that even come close to association with your former contractor employers in the workplace. For example, you cannot directly [REDACTED] from your previous employers. In light of your personal relationship with the contractor, you will need to ensure you have a dedicated telework space with a closed door. This should be stated in your telework policy as well.

On December 4, 2024, [REDACTED] emailed [REDACTED] and wrote that the following email was found in [REDACTED] draft folder regarding the documentation of a conversation they had on March 27, 2023 (Exhibit 13):

[REDACTED] I am documenting our discussion on 3/27/2023 about working with contractors and government personnel being vigilant to avoid conflicts between their official duties and personal interests and must avoid creating any appearance of endorsement or preferential treatment. Per our discussion, you will escalate any potential conflict of interest with any current or future contracts. We ensure you are not involved with any contract activities involving your former employers and that you recuse yourself from any actions that even come close to association with your former contractor employers in the workplace. For example, you cannot directly [REDACTED] [REDACTED] from your previous employers. In light of your personal relationship with the contractor, you will need to ensure you have a dedicated

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telework space with a closed door. This should be stated in your telework policy as well.

OIG also reviewed [REDACTED] telework agreement. As suggested in several of the interviews, [REDACTED] telework agreement does not specify that [REDACTED] is working in a dedicated space with a locked door. [REDACTED] telework agreement cites [REDACTED] address as [REDACTED] (the address [REDACTED] shares with [REDACTED] and states [REDACTED] performs work in a second-floor office with windows and an entry door (Exhibit 17).

OIG reviewed documents retrieved from the portfolio of [REDACTED] government computer. OIG found four MSRs from Vidoori and two invoices spanning [REDACTED] to [REDACTED] (Exhibit X). On the MSRs, [REDACTED] earned a total of over \$[REDACTED] as a part-time employee performing work on this contract (Exhibit 20).

Subject Interview—[REDACTED] (Exhibit 21)

[REDACTED] told OIG that in [REDACTED] current position, [REDACTED] does not have any role in awarding contracts or making decisions related to contracts.

[REDACTED] acknowledged that [REDACTED] is [REDACTED]. [REDACTED] explained that they started dating in either [REDACTED] or [REDACTED]. [REDACTED] said that when [REDACTED] was brought on for [REDACTED] current bureau position, [REDACTED] made it very clear to [REDACTED] that [REDACTED] could not be involved in any contracts because of [REDACTED]. [REDACTED] said [REDACTED] spoke with management and told [REDACTED] it would be okay as long as [REDACTED] had [REDACTED] own office, but that conversation took place verbally. [REDACTED] explained that at home [REDACTED] has [REDACTED] own office with a door, and it is separate from [REDACTED] office, which is on a different floor in the house.

Regarding [REDACTED] relationship with [REDACTED], [REDACTED] said they do not share finances, and [REDACTED] does not pay rent. [REDACTED] explained that [REDACTED] owns the house that [REDACTED] lives in, but [REDACTED] does help pay some bills such as the water bill. [REDACTED] said [REDACTED] usually does not buy [REDACTED] gifts. They recently went on [REDACTED], which [REDACTED] said [REDACTED] paid for with loyalty program points.

[REDACTED] said that [REDACTED] three IBR employees, four Vidoori employees, and one federal employee. [REDACTED] explained [REDACTED] role as [REDACTED]. The 2026 Census Test is under [REDACTED] area and Vidoori is a contractor. [REDACTED] said [REDACTED] never reviews invoices and could not explain how they ended up on [REDACTED] government computer. OIG showed [REDACTED] the invoices that were found on [REDACTED] computer, but [REDACTED] did not recall ever seeing them. [REDACTED] said that [REDACTED] would ask [REDACTED] about the Vidoori employees on [REDACTED] team and [REDACTED] would provide feedback about the performance of the contractors [REDACTED] provide guidance on whether they were accomplishing their goals, or let [REDACTED] know if they needed more time to complete tasks. [REDACTED] did not recall having any familiarity with the 2026 contract application or any of the related documents that were on the bureau's SharePoint.

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Ethics Advice (Exhibit 4)

OIG coordinated with the Ethics Law and Program Office staff, who did not locate any records of ethics advice sought by [REDACTED]

Ethics Law and Program Office staff said that [REDACTED] completed interactive initial ethics training through the Commerce Learning Center on [REDACTED].

Conclusion

Under [REDACTED], [REDACTED] created the appearance of a conflict of interest and misused [REDACTED] public office for private gain by participating in the oversight of a contract awarded to Vidoori, [REDACTED] former employer and the employer of [REDACTED] live-in [REDACTED]

Relationship with [REDACTED]

The evidence and statements obtained in this case confirmed that at the time in question [REDACTED] was in a relationship with [REDACTED] of Vidoori, and living with [REDACTED] at [REDACTED] home. Further, [REDACTED] acknowledged that [REDACTED] lived there rent-free, contributing only to certain household bills.

Activities that created the conflict of interest

This investigation further confirmed that in [REDACTED] official government role, [REDACTED] worked directly with [REDACTED] employees from [REDACTED] company while maintaining a close personal relationship with [REDACTED] including residing at and teleworking from [REDACTED] home.

The previously cited emails from [REDACTED] and [REDACTED] stated that [REDACTED] "cannot directly [REDACTED] from your previous employers." However, [REDACTED] was aware that a large portion of [REDACTED] position involved [REDACTED] with employees of Vidoori, [REDACTED] former employer and the company [REDACTED]. A reasonable person with the relevant facts could believe that [REDACTED] created the appearance of a conflict of interest.

Misuse of public office for private gain

The evidence and statements obtained in this case confirm that [REDACTED] has worked as a federal employee for at least a combined total of [REDACTED] out of the last [REDACTED]. Since [REDACTED] Vidoori has received over \$42 million in government contracts.

In addition, [REDACTED] resides with [REDACTED] at [REDACTED] home in [REDACTED] [REDACTED] reviews invoices from Vidoori while teleworking from this house. Although [REDACTED] is not the approving official, according to [REDACTED] [REDACTED] would review Vidoori's employee performance and

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contract invoices, and then [REDACTED] would approve the invoices, which would lead to Vidoori receiving payment.

The house was last sold on [REDACTED]. The house is a [REDACTED]. The evidence supports that [REDACTED] used [REDACTED] public office for [REDACTED] own private gain, which allows [REDACTED] to live in this home. [REDACTED] through Vidoori's counsel told OIG that because the couple lives together they split many bills, including groceries, so it would be hard to identify which things only [REDACTED] pays for.

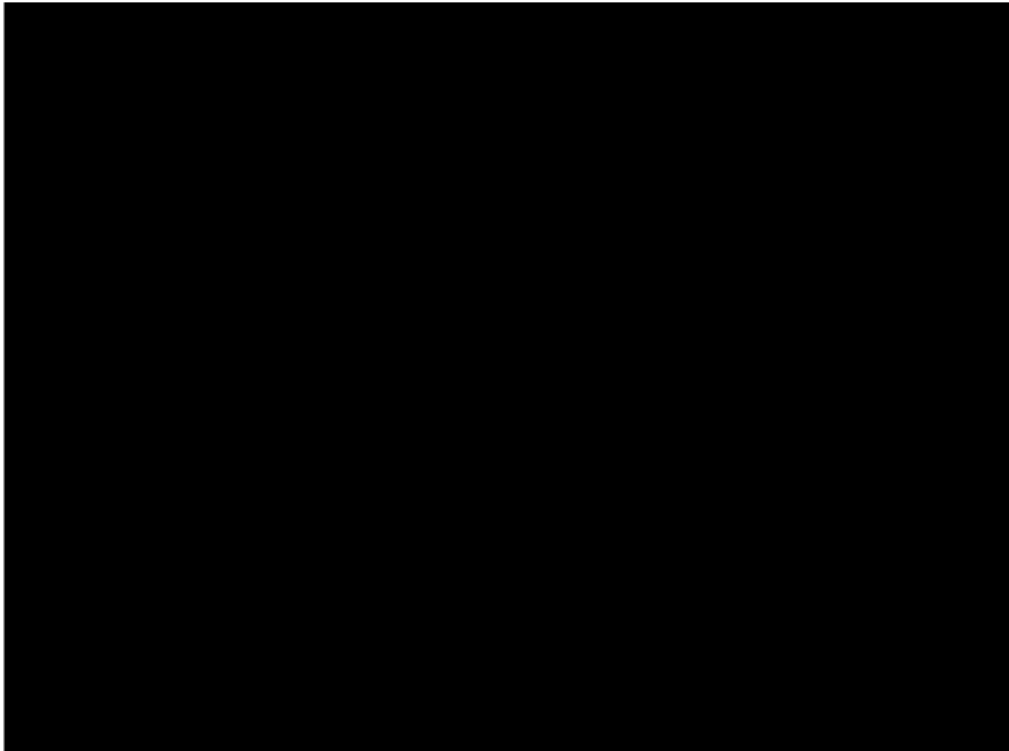


Photo of the house where [REDACTED] and [REDACTED] reside

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DISPOSITION

Referral to the U.S. Department of Justice:

This case was presented to the U.S. Attorney's Office, District of Maryland who declined the case for prosecution. OIG is referring this matter to the U.S. Census Bureau for review and consideration of any administrative actions it deems appropriate (Exhibit 14).

EXHIBITS

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