

**REPORT OF INVESTIGATION
DO-14-2509-I**



Office of Inspector General

United States Department of the Treasury



Office of the Inspector General U.S. Department of the Treasury



Report of Investigation

Case Title: ComputerCOP

Case #: DO-14-2509-I

Investigation Initiated: November 3, 2014

Case Type: Criminal
 Administrative
 Civil

Investigation Completed: SEP - 8 2016

Conducted by: [REDACTED]
 Special Agent

Origin: Hotline

[REDACTED]
 Special Agent
 (Former Case Agent)

Approved by: Jerry S. Marshall
 DAIGI

Summary

On August 8, 2014, the U.S. Department of the Treasury, Office of Inspector General, Office of Investigations (TOIG), initiated an investigation based on information received from the Treasury Executive Office of Asset Forfeiture (TEOAF), alleging that a company named ComputerCOP used a TEOAF memorandum to influence law enforcement agencies to purchase their computer software with TEOAF equitable sharing funds. Additionally, it was alleged that ComputerCOP improperly used the Treasury Seal/Logo and the TEOAF memorandum itself was believed to have been forged and/or altered.

The investigation determined that the allegation is substantiated. Specifically, no less than three law enforcement agencies solicited by ComputerCOP reported the TEOAF memorandum in the solicitation influenced the law enforcement agency's decision in purchasing ComputerCOP's software. After discussions with TOIG, DOJ/U.S. Marshal Service, and Treasury Office of Counsel, ComputerCOP agreed to post a disclaimer on their website to dissociate the Treasury Department from their products. Additionally, ComputerCOP agreed to immediately cease use of the altered letter from the Treasury Department.

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Basis and Scope of the Investigation

On August 8, 2014, TOIG received notification that a computer software company called ComputerCOP was improperly using the Treasury Seal/Logo. An unsigned document which appeared to be from the Treasury Department was discovered during a Freedom of Information Act (FOIA) search. The document was believed to have been forged. (Exhibit 1)

ComputerCOP is a software program designed to be installed on computers to monitor and log the use of certain key words that are typed on the end user's computer.

During the course of the investigation, no interviews were conducted. TOIG reviewed pertinent documents, including:

- TEOAF FOIA Request 2014-02-047.
- TEOAF Emails pertaining to ComputerCOP.

Investigative Activity

On August 24, 2001, TEOAF responded to an inquiry from the Suffolk County Sheriff's Department in Riverhead, New York regarding the use of equitable sharing funds to purchase ComputerCOP software for distribution to the local community. TEOAF advised that this would be a permissible use of equitable sharing funds since the software would be purchased by law enforcement and distributed by law enforcement. In 2010, TEOAF also responded to a request from the Passaic County Sheriff's Department to purchase the ComputerCOP software using equitable sharing funds. TEOAF advised this use of funds would be permissible, provided that the software is purchased directly by the law enforcement agency and distributed directly by the law enforcement agency. (Exhibits 3 & 4)

On February 10, 2014, TEOAF received a Freedom of Information Act (FOIA) request from Electronic Frontier Foundation for information pertaining to ComputerCOP. During this search and subsequent investigation, it was discovered that ComputerCOP had altered the 2001 letter from TEOAF and made it appear to be a blanket permission for all law enforcement agencies to use equitable sharing funds to purchase the software. (Exhibit 2)

TOIG forwarded approximately 240 letters to all known law enforcement agencies that ComputerCOP solicited. TOIG asked each agency if their decision to purchase ComputerCOP's software was influenced by the TEOAF memorandum in the solicitation packet. TOIG received responses from 30 agencies. Three agencies advised that the TEOAF memorandum did influence their decision, while the remaining 27 stated that it did not. (Exhibit 5)

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TOIG Office of Counsel discussed this matter with DOJ/U.S. Marshal Service. During the discussion, it was decided that since ComputerCOP had complied with all requirements to cease use of the altered letter and post a disclaimer on their website, no further action was needed.

Referrals

This case was not referred to DOJ due to the fact that the three year statute of limitations on the offense had lapsed.

Judicial Action

N/A

Findings

The investigation determined that the allegation is substantiated. Specifically, no less than three law enforcement agencies solicited by ComputerCOP reported the TEOAF memorandum in the solicitation influenced the law enforcement agency's decision in purchasing ComputerCOP's software. After discussions with TOIG, DOJ/U.S. Marshal Service, and Treasury Office of Counsel, ComputerCOP agreed to post a disclaimer on their website to dissociate the Treasury Department from their products. Additionally, ComputerCOP agreed to immediately cease use of the altered letter from the Treasury Department.

Distribution

John Farley, Acting Director, Treasury Executive Office for Asset Forfeiture

Mike Lewis, Senior Advisor, Departmental Offices

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Signatures

Case Agent: 
 _____

6 Sep 16
Date

Supervisor: 
Jerry S. Marshall _____

8 SEP 2016
Date

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Exhibits

1. Complaint Initiation, dated August 8, 2014.
2. Altered Treasury Department letter, not dated.
3. Treasury Department letter to Suffolk County Sheriff Department, dated August 24, 2001.
4. Treasury Department letter to Passaic County Sheriff's Department, dated June 25, 2010.
5. Memorandum of Activity – TOIG Law Enforcement Survey, dated February 24, 2015.