UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL

DATE: January 12, 2015 **PREPARED BY:** [redacted]

CASE #: 2007-CS-0009 **CROSS REFERENCE #:** N/A

TITLE: CHEMTECH CONSULTING GROUP, LTD.

CASE CLOSING REPORT

Subject(s)	Location	Other Data
Chemtech Consulting Group, Ltd.	Mountainside, NJ	N/A

VIOLATIONS:

18 USC Section 371	Conspiracy to commit offense or to defraud the United States
18 USC Section 287	False, fictitious or fraudulent claims
18 USC Section 1343	Fraud by wire, radio, or television
18 USC Section 1341	Mail fraud and swindles
18 USC Section 1001	Fraud and False Statements; Statements and Entries Generally

ALLEGATION:

On May 6, 2005, OI initiated an investigation based on information provided by [redacted], [redacted] Department of Health Services (DHS), State of Arizona, Phoenix, AZ. Based on [redacted] Chemtech Consulting Group, Ltd. (Chemtech), Mountainside, NJ and [redacted] alleged that Chemtech was falsifying laboratory data. Preliminary results obtained from the laboratory audit revealed Chemtech performed multiple peak shavings and performed poor laboratory instrument maintenance.

FINDINGS:

On May 31, 2005, OI met with [redacted] who advised that [redacted] severe problems with data packets associated with EPA Method 8270 (semi-volatile organic compounds), large amounts of manual integrations, and instances of time travel. On June 1, 2005, [redacted], DHS and [redacted], DHS were interviewed. [redacted]

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Chemtech. [redacted] used Mint Miner (a data mining software package) on a specific data package and identified an inordinate number of manual integrations associated with EPA Method 8270. [redacted] focused on data packages associated with EPA Methods 8011 (ethyl dibromide), 8015 (Fuels), and 8081A (Pesticides) and found instances of poor resolution, bad integrations, baseline noise integration (especially with fuels), and final reports not containing the Arizona license number associated with all three methods.

On December [redacted] 2005, [redacted], former [redacted] Chemtech was interviewed. On December [redacted] 2005, [redacted], former [redacted] Chemtech was interviewed. On December [redacted] 2005, [redacted], former [redacted] Chemtech was interviewed. All three former employees attested to the high turnover of analysts, excessive hours, missed sample hold times, and stressful work conditions at Chemtech. [redacted] and [redacted] were shown examples of manual integrations and confirmed that some of the manual integrations were inappropriate.

On April [redacted] 2006, [redacted], former [redacted] Chemtech was interviewed. [redacted] claimed no recollection of inappropriate manual integrations. In addition, [redacted] claimed no analyst experience prior to working for Chemtech and advised [redacted] received no formal training at the company.

On June [redacted] 2006, [redacted], former [redacted] and [redacted] Chemtech was interviewed and claimed no knowledge of irregularities at the company. However, [redacted] was shown an example of a manual integration and confirmed that it was inappropriate.

On January 11, 2010, EPA-OIG [redacted] report on [redacted] was approved and finalized. [redacted] identified several examples where calibration standard peaks had the integration baseline extended beyond the baseline of the peak, also called peak juicing. The extension of the integration baseline caused more area to be included as part of the peak. [redacted] had seen many other situations where this had been done to meet the method calibration criteria, whereas if the peak area was not improperly integrated the method calibration criteria would not be met and the analyst would have to take some type of corrective action. The corrective actions could include rerunning new calibration standards, up to taking the instrument off-line for cleaning. The corrective actions would result in instrument down time, where billable analyses could not be performed. In [redacted] book, [redacted] states that these types of integration baseline extensions are fraud. If the gas chromatograph/mass spectrometry (GC/MS) instrument is not properly calibrated then the results for real samples are of unknown accuracy and unknown reliability. Therefore, determination of compliance with environmental regulations or cleanup actions based upon the data may not be correct.

The evaluation procedure for the bromofluorobenzene (BFB) tune compound is explicit in how the evaluation is to be performed averaging 3 scans and background subtracting 1 scan. If the tune criteria is not met, then the analyses is supposed to stop and corrective action taken until the tune criteria are met. [redacted] found many instances where [redacted] deviated from the specified BFB evaluation procedure by using 1, 4, or 5 scans to make it appear that the tune criteria were met. The data package provided to the client included a BFB tune evaluation form which indicated that the tune criteria were met, when it really was not met. The data package also included a Chemtech review checklist for the data that indicated that the tune criteria were met,

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when they really were not met. If the tune criteria are not met, then the computer algorithms used to identify and quantify data may not work properly and may result in false negatives. A false negative is when a compound is reported as not being present when it really is present.

One instance of time traveling was found in the audit trail for one calibration standard. Time traveling is when the date and/or time of events are changed and out of sequence. While [redacted] found only one documented time traveling event, this may indicate that computer time clocks were manipulated on a more wide-spread basis. Therefore, it makes the data suspect as to whether events occurred on the dates and times reported in the documentation.

On May [redacted] 2010, [redacted], former [redacted] section, Chemtech was interviewed. [redacted] was shown an example of a peak [redacted] manually integrated and one prepared by [redacted]. [redacted] agreed that the one prepared by [redacted] was more precise. There were other examples with extended baselines shown to [redacted]. [redacted] agreed that some were extended and others were extended just a little bit beyond the peak. [redacted] stated generally the baseline was integrated to include more area than should have been assigned to the peak. [redacted] stated at times the peak had tailing so bad that they had to add area. In 2002 through 2004 this may have occurred more often. After the training in 2005 it occurred for a period of time and then things changed. [redacted] stated that any manual integrations done after 2005 were done properly. [redacted] stated Chemtech became very strict in 2005 and things changed for the better.

[redacted] stated when they had many samples and were under pressure to get them out; [redacted] sometimes manually integrate the peaks to get the samples out. [redacted] stated the first and second time [redacted] tried [redacted] could not manually integrate. [redacted] would show [redacted] how to manipulate. [redacted] told [redacted] and others how to manipulate the peaks. [redacted] believed if the supervisor did something then it was ok for [redacted] to do it too. [redacted] showed [redacted] how to pass samples on the instruments. [redacted] stated that [redacted] did the manual integrations a lot. [redacted] stated [redacted] did this too but only occasionally. [redacted] provided two reasons for this – the first being if others use it to pass it then it is ok. The second reason being [redacted] did it because others were doing it. [redacted] was afraid of "job security" if [redacted] did not get the samples out.

[redacted] stated the more senior people in Chemtech knew about the improper manual integrations. [redacted] added [redacted] supervisor knew about the improper manual integrations. [redacted] stated that [redacted] and a Chemtech co-worker had a discussion [redacted] about their activities at Chemtech. They concluded that some of their activities could get them thrown in jail. [redacted] did not provide the name of the co-worker [redacted] had this discussion with and could not recall the date of the conversation.

On May [redacted] 2010, [redacted] Section, Chemtech was interviewed. [redacted] stated currently [redacted], knows when manual integrations were done and how often. The supervisor checks the manual integrations and is responsible for approving them. [redacted] looks at all of the quality control (QC) checks to see if they pass. Once the project is completed it goes to the QC department for review. [redacted] does not know what types of reviews/checks are conducted by QC. [redacted] was unaware of the data flow process once [redacted] results were turned over to QC.

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In the past, the peaks were too wide (on the instrument) which caused the analysts to do many manual integrations. [redacted] was shown an example of a non-compliant BFB tune. [redacted] reviewed the documentation and did not refute it was done incorrectly. [redacted] stated that you could not get away with that now. They were not that strict back then. [redacted] was shown three examples that did not pass. [redacted] blamed the issue on improperly maintained instruments. [redacted] added that this involved a large volume of samples. [redacted] messed up on a few tunes by averaging the BFB and not background subtracting as required by the Method. [redacted] signed the documents and certified they were done correctly even though [redacted] knew they were not. [redacted] advised this type of activity is no longer occurring at the lab.

[redacted] was shown an example when the integration baseline had been extended. [redacted] stated [redacted] did not have much experience at the time [redacted] [redacted] added at that time the instruments were not that great to calibrate, i.e., faulty instrumentation. [redacted] acknowledged that the data was not integrated correctly. [redacted] stated incorrect manual integrations occurred during the six months [redacted]. [redacted] did not believe they had a lab manager at this time.

[redacted] stated [redacted] was aware of others performing improper manual integrations. [redacted] identified [redacted], [redacted], and [redacted] as having conducted improper manual integrations. [redacted] stated [redacted] had to perform many manual integrations [redacted] had the worst performing instrument.

[redacted] stated in 2005 the holding times for the samples were very close to expiring so they (the analysts) were under pressure to get the samples analyzed. Chemtech was very busy at that time. [redacted] stated there was pressure to get work out. The work would pile up. There was a short turnaround time (TAT) for samples. The supervisors kept asking when samples were going to be done. [redacted] added that faxes kept coming in demanding sample results. [redacted] stated they were using the auto samplers on the instruments but you could not run them all day long. They were never asked by the supervisors how the work load was. They [redacted] were under a lot of pressure. [redacted] worked [redacted] it was the busy time. [redacted] also worked [redacted] [redacted] worked approximately nine hours on busy days. [redacted] comment to [redacted] during a meeting about work load and [redacted] replied "there's the door" if you want to complain.

[redacted] believes [redacted] of the lab. [redacted] did not believe that [redacted] was aware of the improper manual integrations. [redacted] believed [redacted] were aware of the improper/incorrect manual integrations but did not believe upper management was aware.

On May 11, 2010, [redacted] report on [redacted] was approved and finalized. [redacted] found several examples where calibration standard peaks had the integration baseline extended beyond the baseline of the peak, also called peak juicing. The extension of the integration baseline caused more area to be included as part of the peak. [redacted] had seen many other situations where this had been done to meet the method calibration criteria, whereas if the peak area was not improperly integrated the method calibration criteria would not be met and the analyst would have to take some type of corrective action. The corrective actions could range from rerunning new calibration standards, up to taking the instrument off-line for cleaning. The corrective actions would result in instrument down time, where billable analyses could not be performed.

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found many instances where deviated from the specified BFB evaluation procedure by using 1, 4, or 5 scans to make it appear that the tune criteria were met. The data package provided to the client included a BFB tune evaluation form which indicated that the tune criteria were met, when it really was not met. The data package also included a Chemtech review checklist for the data that indicated that the tune criteria were met, when they really were not met.

On May 2010, , former Section, Chemtech was interviewed. stated that most of training was on the job training. was shown how to run samples and use the machines by . was told how to do work in the department. work was reviewed by .

was shown an example of a manual integration and time traveling. verified signature on the signature log which Chemtech had provided to the OIG. stated was not familiar with the audit trail. pointed out in last couple of pages where the date and time stamps went from January 2005 to December 2004 then back to January 2005. could not explain how this happened. did not recall changing the time clocks on the computer. stated did not recall what most of the documents shown to by meant. reiterated never did anything without

was shown an example of a manual integration. stated that it was possibly initials on the document but noted the document was not signed. stated vaguely remembered manual integration. Upon being shown a copy of work compared to the work being duplicated by , assumed the one done by was correct as opposed to the one had prepared. stressed that everything did was with .

was shown an example of two correctly done volatile organic instrument performance checks, also referred to as the BFB tune, and the corresponding spreadsheet prepared by showing that in many cases the BFB was not properly evaluated according to the method. explained the method requires averaging three scans and background subtracting a single scan. advised often the BFB tunes performed by were just of three averaged scans without the required background subtracted scan or were averages of scans other than the required three scans. When these documents were evaluated by the BFB tunes which presented as passing the method requirements often failed the tune requirements. did not offer any explanation for this. once again stated

DISPOSITION:

On April 7, 2006, this matter was preliminarily presented to Assistant United States Attorney (AUSA) Tom Calcagni, District of New Jersey, Newark, NJ. After apprising AUSA Calcagni of the facts and circumstances of this investigation, (b) (5)

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On June 11, 2009, this matter was presented to Sabrina G. Comizzoli, Chief, Government Fraud Unit, District of New Jersey, U.S. Department of Justice, Newark, NJ. (b) (5) [redacted]

On August 27, 2010, this matter was presented to AUSA Kathleen O'Leary, Criminal Division, District of New Jersey, Newark, NJ. After discussing the facts of the case and the potential outcomes, AUSA O'Leary advised that her office was declining prosecution of this matter based (b) (5) [redacted]

On September 1, 2011, this matter was presented to AUSA Anthony J. LaBruna, Civil Division, District of New Jersey, Newark, NJ. After discussing the facts of the case and the potential outcomes, AUSA LaBruna advised that (b) (5) [redacted] AUSA LaBruna was in agreement that OI should pursue administrative remedies relative to this investigation.

On May 18, 2012, a Report of Investigation (ROI) was issued to [redacted], EPA, Suspension and Debarment Division (SDD). On July 10, 2014, OI received a Memorandum from SDD dated June 30, 2014. SDD indicated (b) (5) [redacted] the suspension and debarment case against CHEMTECH should be closed." SDD added (b) (5) [redacted] SDD reserves the right to reopen this case. This recommendation (b) (5) [redacted]

The investigation substantiated the allegations of large amounts of improper manual integrations and time travel. The investigation also found instances of peak shaving. During interviews of former Chemtech employees, several of them attested to the high turnover of analysts, excessive hours, missed sample hold times, and stressful work conditions at Chemtech. Several of the [redacted] were also shown examples of manual integrations and confirmed that some of the manual integrations were inappropriate. The EPA OIG [redacted] assigned to this matter identified several [redacted] involved with improper manual intergration. The matter has been declined criminally, civilly and administratively. As such, this investigation will be closed at this time.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
TWO POTOMAC YARDS
2733 SOUTH CRYSTAL DRIVE
ARLINGTON, VA 22202

DATE: January 9, 2015

PREPARED BY: SA [redacted]

CASE #: OI-AR-2011-ADM-1228

CROSS REFERENCE #: Hotline 2010-0477, Hotline 2010-336, Hotline 2010-358, Hotline 2010-468.

TITLE: OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

CASE CLOSING REPORT

Subject(s)	Location	Other Data
Unknown	Washington, DC	

VIOLATION(S)
5 C.F.R. Part 2635: Standards of ethical conduct for employees of the executive branch

ALLEGATION: On or about October 7, 2010, complainant, [redacted], [redacted] made a complaint via the OIG Hotline #2010-477, alleging a conflict of interest between EPA, Office of Chemical Safety and Pollution Prevention (OCSPP) and big business, namely CID Lines N.V. (CID), Waterpoortstraat 2, 8900 leper, Belgium +32 (0)57 21 78 77, Contact: 1+32 (0) 57 21 78 77. Complainant [redacted] also alleged CID used PI's studies, toxicity reports, inhalation data, chemistry data, etc., without PI's permission, and without compensating PI. Finally, Complainant [redacted] alleged CID falsified documentation to obtain registration for their Virocid product, and that former EPA, OCSPP employee [redacted] of [redacted], VA., [redacted], Contact: [redacted], may have assisted CID with obtaining PI's data.

FINDINGS: On March 14, 2012, Special Agent (SA) [redacted], of the United States Environmental Protection Agency (EPA), Office of the Inspector General (OIG), Office of Investigations, interviewed [redacted] and learned that PI's Synergize product #66171-7, was approved by the EPA, OPP, on approximately April 24, 2000, and hit the markets shortly thereafter. CID's Virocid product #71355-1 was approved by the EPA, OPP on approximately September 5, 2000, and hit the markets shortly thereafter. According to [redacted], CID struggled from 1998 to 2000 to get their chemical data and studies approved by the EPA, and it was only after PI's product

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Synergize was approved and available for market, that CID obtained and used PI's data, and then was able to get their product approved. [redacted] went even further to suggest that CID changed the name of their product from Virocid to Ster-Cid, all while using PI's data without PI's permission and compensation. According to [redacted], in September 2001, PI filed a Freedom of Information Act (FOIA) request with the EPA, and this was when PI learned that CID copied and used PI's data and studies. Upon learning this information via FOIA, [redacted] said PI did not ask CID for compensation. According to [redacted], PI filed a civil suit against CID in approximately 2001 or 2002. However the case never went to court [redacted].

[redacted], personnel from EPA, OCSPP, OPP, and initiated EPA, OIG Hotline complaints. In 2010, [redacted] filed approximately four (4) EPA, OIG Hotline complaints (**Hotline 2010-0477, Hotline 2010-336, Hotline 2010-358, Hotline 2010-468)** see below**,** alleging that the EPA was allowing CID and other companies to register products without going through the proper registrant product procedures. [redacted] also alleged that the EPA was allowing dangerous products to be sold on the market. These complaints did not fall under the purview of the OIG OI, and therefore were referred to the EPA Regional Enforcement Coordinator, EPA Criminal Investigations Division (CID), EPA Office of Enforcement and Compliance Assurance (OECA), EPA OCSPP, and EPA, OIG, Office of Program Evaluation (OPE).

OI Referrals Made:

1). On March 17, 2010, EPA, OIG, Office of Cyber Investigations and Homeland Security (OCI-HS), referred this complaint to EPA, Region 9, [redacted] – OIG Hotline #2010-336.

2). On April 1, 2010, EPA, OIG, OCI-HS, referred this complaint to EPA, CID– OIG Hotline #2010-358.

3). On April 13, 2010, EPA, OIG, OCI-HS, referred this complaint to EPA, OECA, and EPA OCSPP – OIG Hotline #2010-358.

4). On August 16, 2010, EPA, OIG, OCI-HS, referred this complaint to EPA, CID – OIG Hotline #2010-468.

5). On October 7, 2010, EPA, OIG, OCI-HS, referred this complaint to EPA, OIG OI, Headquarters – OIG Hotline #2010-477.

6). On December 23, 2010, EPA, OIG, OI, Northeastern Resource Center, referred this complaint to EPA, Region 4, CID.

7). On February 11, 2011, EPA, OIG OI, Headquarters, referred this complaint to EPA, OIG, OPE.

Interviews of EPA OCSPP, Office of Pesticide Programs (OPP) personnel were conducted during which OPP explained the following: Synergize and Virocid are substantial similar products, meaning the active ingredients are relatively in the same portion, same chemical composition, and similar inert ingredients. In such circumstances there are approved mechanisms by which a similar product can seek expedited registration using another products data. OPP

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further stated the checklist for the Virocid registration package appears to be intact and complete. Lastly, OPP, explained when companies have a dispute with one another regarding the use of their data and compensation, it is up to the companies to resolve that issue, and not the EPA. Reviews of the documents obtained suggested that [redacted] took the necessary and correct measures to register [redacted] product with the EPA for consideration of approval.

DISPOSITION: Unfounded. Closed

This investigation was unable to substantiate any allegations of misconduct involving EPA personnel. Additionally, all appropriate referrals have been made, therefore this investigation is closed in this office.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL

DATE: NOVEMBER 17, 2014 **PREPARED BY:**

CASE #: OI-AR-2014-ADM-0035 **CROSS REFERENCE #:**

TITLE: [redacted], CRIMINAL INVESTIGATOR, CRIMINAL INVESTIGATIONS DIVISION, EPA

CASE CLOSING REPORT

Subject(s)	Location	Other Data
[redacted]	[redacted]	

VIOLATIONS: EPA's Appendix-Guidance on Corrective Discipline, EPA ORDER 3120.1(1) – Attendance related offenses

ALLEGATIONS: Special Agent (SA) [redacted], [redacted], [redacted], engaged in unauthorized outside work employment; and, SA [redacted] engaged in time and attendance fraud by manipulating leave forms.

FINDINGS: The investigation found both the foregoing allegations to be unsupported. First, concerning the issue of outside work employment, the facts indicate Special Agent [redacted] took appropriate action. This included obtaining the appropriate authorization to conduct outside work from [redacted] supervisor and disclosing this business activity on [redacted] confidential financial disclosure report (OGE-450). Ultimately, Special Agent [redacted] stopped [redacted] not long after [redacted] began it [redacted]

Second, concerning the allegation that Special Agent [redacted] engaged in time and attendance fraud by manipulating leave or flexiplace forms or had others do so, there are no facts supporting this allegation. Special Agent [redacted] was questioned as to whether [redacted] had ever replaced leave with regular time, or altered flexiplace forms, for [redacted] or any employee, in order to put in for time which was not actually worked. Special Agent [redacted] response was a vehement "No." [redacted] explained that if fact [redacted] has worked during leave, [redacted] worked from [redacted], and has lost use or lose. Further, with regard to [redacted] replacing leave with regular time for employees, Special Agent [redacted] stated [redacted] had not and further, that [redacted] does not have the ability to go into Peopleplus to approve or change time.

DISPOSITION: All allegations unsupported. Close case with no further action.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL

DATE: January 12, 2015 **PREPARED BY: [redacted]**

CASE #: OI-AT-2015-CAC-0018 **CROSS REFERENCE #:**

TITLE: [redacted], FORMER EPA REGION [redacted] IT CONTRACTOR

CASE CLOSING REPORT

Subject(s)	Location	Other Data
[redacted]		

VIOLATION(S):

Theft of US Government Property, 18 USC 641

ALLEGATION:

[redacted], former EPA Region [redacted] Information Technology (IT) contractor, failed to return an EPA issued computer upon [redacted] termination by EPA Region [redacted] IT contractor, Heartland Technology Group (HTP).

FINDINGS:

On February [redacted] 2014, [redacted] was assigned a Microsoft Surface Pro Tablet, bearing serial number [redacted] and EPA decal No. [redacted], for evaluation and testing purposes. The device was not to be removed from EPA workspaces within the [redacted] Federal Center without authorization to do so. The missing device was valued at $699.00.

On November [redacted] 2014, [redacted]'S employment was terminated by HTG. The Microsoft tablet was not located within EPA workspaces. Attempts to collect device from [redacted] have been unsuccessful.

On December 4, 2014, the EPA Region [redacted] Property Management Section was notified, via written memorandum, of the theft of an EPA owned computer assigned to the Information Infrastructure Branch (IIB), EPA Region [redacted], [redacted]. The theft from IIB was reported by [redacted], [redacted], IIB. [redacted], Property Management Section notified EPA-OIG of the possible theft.

After notification to EPA-OIG, HTG again contacted [redacted] regarding the return of the device. On December [redacted] 2014, [redacted] returned the device to EPA [redacted].

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DISPOSITION:

The device was undamaged and returned to service by EPA. No further action required.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
TWO POTOMAC YARD
2733 SOUTH CRYSTAL DRIVE
ARLINGTON, VA 22202

DATE: February 17, 2015 **PREPARED BY:** SA [redacted]

CASE #: OI-BO-2013-CFR-0028 **CROSS REFERENCE #: NA**

TITLE: ABT ASSOCIATES, INC.

CASE CLOSING REPORT

Subject(s)	Location	Other Data
ABT ASSOCIATES, INC.	Cambridge, MA	

VIOLATIONS:

1. False Claims, 31 United States Code (USC) § 3729-33

2. Civil Actions for False Claims, 31 USC §3730 (b) (2)

ALLEGATIONS

On January 3, 2013, Special Agent (SA) [redacted], of the United States Environmental Protection Agency (EPA), Office of Inspector General, Boston Field Office, 5 Post Office Square, Suite 100 Boston, Massachusetts (MA), 02109, received Hotline Complaint 2013-066. The complaint included a letter, dated December 26, 2012, from Carmen M. Ortiz, United States Attorney, Department of Justice (DOJ), District of Massachusetts and a copy of a qui tam complaint filed under seal in U.S. District Court, Boston, MA, dated November 29, 2012. In the qui tam, the Relator alleged that Abt Associates, Inc. (ABT), Cambridge, MA submitted defective pricing in its bid proposals and submitted false or fraudulent bills for government contracts with the Department of Defense, General Service Administration, and United States Agency for International Development. The EPA-OIG began its investigation of ABT's contracts with the EPA as did the other agencies cited above.

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FINDINGS:

On or about February 11, 2015, Susan M. Poswistilo (Poswistilo), Assistant United States Attorney (AUSA), United States Attorney's Office (USAO), DOJ, District of Massachusetts, located at 1 Courthouse Way, Suite 9200, Boston, MA 02210, [redacted] informed this office that DOJ has closed the ABT case. (b) (5) [redacted]

DISPOSITION: Unfounded. Closed.

Based on the information received from USAO, District of Massachusetts, no further investigative activity is anticipated. This investigation is closed in the files of this office.

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