



NATIONAL CREDIT UNION ADMINISTRATION
Office of Inspector General
Office of Investigations

REPORT OF INVESTIGATION

CASE NUMBER: 20-01

ISSUE DATE: February 10, 2020

CASE TITLE: Michael McKenna and Lara Daly-Sims

VIOLATIONS: Misuse of Official Time, Illegal Drug Use, Time and Attendance Fraud (Daly-Sims)

PREDICATION

On November 17, 2019, the National Credit Union Administration (NCUA) Office of Inspector General (OIG) received information that then-NCUA General Counsel Michael McKenna and then-NCUA Deputy General Counsel Lara Daly-Sims drank alcohol and went to strip clubs during work hours.

SUBJECT INFORMATION

DISTRIBUTION: Rodney E. Hood Chairman J. Mark McWatters Board Member Todd M. Harper Board Member Mark A. Treichel Executive Director	CASE AGENT: <div style="border: 1px solid black; padding: 2px; text-align: center;">(b)(6);(b)(7)(C)</div> Director of Investigations <div style="border: 1px solid black; padding: 2px; text-align: center;">(b)(6);(b)(7)(C)</div>	APPROVED: Marta Erceg Counsel/Assistant Inspector General for Investigations
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ERCEG**

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Michael McKenna, former NCUA General Counsel and Designated Agency Ethics Official, SSP-03

Lara Daly-Sims, former NCUA Deputy General Counsel, SSP-02

RELEVANT STATUTES, REGULATIONS, AND RULES

A. Time and Attendance Fraud (relevant to Daly-Sims)

Improper recording of time and attendance to receive pay for time not actually worked is theft from the federal government that is subject to criminal prosecution under 18 U.S.C. § 641. False statements or claims made by the employee, such as an inaccurate time sheet submitted to cover up an employee's work hour shortage, violate 18 U.S.C. § 287 and § 1001 and 31 U.S.C. § 3729.

NCUA Personnel Manual, Chapter 19, Hours of Work, provides that employees are responsible for correctly accounting for all hours in their workdays and workweek and must report timekeeping errors or inconsistencies to their supervisors as soon as possible. Chapter 19 also provides that employees must take a lunch break that is not less than 30 minutes when working 8 or more hours in a day. The lunch break is not considered part of the basic workday and the workday may not be shortened by working through the lunch period on a voluntary basis.

B. Misuse of Official Time

The Standards of Ethical Conduct for Employees of the Executive Branch at 5 C.F.R. § 2635.705 provide that an employee shall use official time in an honest effort to perform official duties and that an employee shall not encourage, direct, coerce, or request a subordinate to use official time to perform activities other than those required in the performance of official duties or authorized in accordance with law or regulation. Section 2635.101(b)(14) sets forth that employees shall endeavor to avoid any actions creating the appearance that they are violating the law or the Standards of Ethical Conduct.

The Standards of Ethical Conduct list as a related statute 5 U.S.C. § 7352, which prohibits employment of a person who habitually uses intoxicating beverages to excess.

NCUA Personnel Manual Chapter 19 provides that the lunch break is a time set aside to take time out for a meal or engage in permitted personal activities. Chapter 19 also provides that an employee on a flexible work schedule may take up to 1-1/2 hours beyond the 30-minute lunch period provided the employee adjusts the tour of duty to meet the daily requirements of his or her schedule.

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NCUA Instruction No. 9903, NCUA Personnel Suitability and Security Program, provides that all NCUA staff are responsible for maintaining an environment where personal conduct, trustworthiness, and character are known to be important and compliance with this instruction is expected and required.

C. Illegal Drug Use

Executive Order 12564, Drug-Free Federal Workplace, codified at 5 U.S.C. §7301 note, provides that federal employees are required to refrain from the use of illegal drugs, including marijuana, and that the use of illegal drugs by federal employees, whether on-duty or off-duty, is contrary to the efficiency of federal service, and people who use illegal drugs are not suitable for federal employment.

NCUA Instruction No. 1238, Drug Testing Program, consistent with the Executive Order, provides procedures for random drug testing of employees holding designated positions, including McKenna and Daly-Sims, and also procedures for drug testing when there is a reasonable suspicion that an employee uses illegal drugs whether on- or off-duty. Reasonable suspicion testing may also be required of any employee in any position when there is reasonable suspicion of on-duty drug use or on-duty impairment.

SYNOPSIS

On November 17, 2019, NCUA Executive Director Mark Treichel and Deputy Executive Director John Kutchey informed the OIG that Kutchey had learned from then-Deputy General Counsel Lara Daly-Sims that she and then-General Counsel Michael McKenna drank alcohol and went to strip clubs during work hours. The Reporting Agent (RA) opened an investigation of this matter on November 18, 2019, and later expanded the scope of the investigation to include an examination of Daly-Sims' time and attendance after the RA discovered that Daly-Sims' NCUA daily parking garage duration was routinely less than 8 hours.

The investigation substantiated the allegations that McKenna and Daly-Sims drank alcohol and went to strip clubs during work hours. McKenna and Daly-Sims both stated in their interviews that they drank alcohol and went to strip clubs during work hours.

Daly-Sims stated in her interview that when she raised her concerns of getting in trouble, McKenna said that if they were reported to the Inspector General, they should just say they were offsite at a planning session. When interviewed, McKenna initially claimed to have no knowledge of anyone from the Office of General Counsel drinking heavily at offsite meetings until the RA asked him if he attended offsite planning meetings.

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In addition, Daly-Sims stated during her interview that she and McKenna consumed edible marijuana during work hours while they were on work-related travel in New York City. McKenna stated in his interview that he had not used marijuana during the workday at the NCUA or at all since joining the Army in 1985, and that he did not remember consuming edible marijuana during the New York trip. The day following his interview, November 19, 2019, McKenna retired from the NCUA after being informed by Executive Director Mark Treichel that McKenna might be drug tested. Treichel also informed McKenna that he expected McKenna would not be at the NCUA Board meeting on November 21 because he would have been placed on administrative leave. During a second interview with McKenna on January 2, 2020, the RA read McKenna a document Daly-Sims had provided the OIG, in which McKenna wrote to her: "We smoke a joint in your hot tub." McKenna told the RA that this was a joke.

The investigation of Daly-Sims's time and attendance determined that Daly-Sims worked 374 fewer hours than what she claimed on her timesheets for the period of April 3, 2017, through November 9, 2019, which amounted to \$46,951.96 in salary that she should not have received. The hours she spent drinking and going to strip clubs with McKenna during the workday was not part of, but on top of, her 374-hour shortage, except for 45 minutes on June 9, 2017, which was included in the shortage calculation.

Daly-Sims resigned from the NCUA on January 10, 2020, while on administrative leave. On January 27, 2020, in response to a request by the RA, through her attorney, Daly-Sims declined to be interviewed about the discrepancies in her time and attendance.

On November 25, 2019, the United States Attorney's Office for the Eastern District of Virginia declined to prosecute McKenna and Daly-Sims for drinking alcohol and going to strip clubs during the workday.

On January 23, 2020, the United States Attorney's Office for the Eastern District of Virginia declined to prosecute Daly-Sims for time and attendance fraud.

DETAILS

A. Lara Daly-Sims

On November 18-19, 2019, the RA and the Assistant Inspector General for Investigations (AIGI) interviewed Deputy General Counsel Daly-Sims, and on December 4, 2019, the AIGI

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interviewed Daly-Sims, regarding allegations that she and McKenna drank and went to strip clubs during the workday. (Exhibits 1, 2, and 3)

Daly-Sims and McKenna first started drinking and going to strip clubs during the workday on February 16, 2017, after McKenna took Daly-Sims and other Office of General Counsel (OGC) attorneys to lunch to fulfill a bet she had with him on the New England Patriots winning the Super Bowl. After lunch, McKenna told Daly-Sims to give him 30 minutes and they would go somewhere else to collect on the second part of their bet. Around 1:00 p.m. or 1:30 p.m., Daly-Sims and McKenna went to a restaurant in downtown Washington, DC and had a couple of beers and some shots of alcohol. After that, Daly-Sims and McKenna went to the strip club next door, Camelot. McKenna had single dollar bills that he gave Daly-Sims to give to the entertainers. She believed they returned to the NCUA around 4:00 p.m. or 4:30 p.m. because that was when McKenna's workday usually ended. Daly-Sims said she felt very uncomfortable drinking and being at a strip club during work hours but did not think someone could tell that she felt uncomfortable. She thought they went to the strip club because she had told McKenna previously that she had never been to a strip club and also thought that McKenna was trying to make her feel better because she (b)(6);(b)(7)(C)

Including this first visit to the strip club in February 2017, McKenna and Daly-Sims went together to strip clubs seven times over a 22-month period, the last time in December 2018. They went to Camelot four times, to another Washington, DC strip club near the St. Regis Hotel once, and to a strip club in New York City, Rick's Cabaret, twice over 2 days. On average, their visits to strip clubs, including travel, were at least 3 to 4 hours long. The strip club visits also involved drinking a lot of alcohol, except for a time Daly-Sims did not drink (b)(6);(b)(7)(C)

(b)(6);(b)(7) Apart from Rick's Cabaret, where McKenna paid with his personal credit card, Daly-Sims paid for the strip clubs on her personal credit card and McKenna provided cash to tip the strippers. Daly-Sims never used her government credit card or government funds for strip clubs or alcohol.

Twice during this period, they drank alcohol heavily during the workday without visiting a strip club. Daly-Sims said that drinking alcohol during the workday continued until McKenna left the NCUA in November 2019, but it was not "hardcore." McKenna and Daly-Sims sometimes would have a late lunch on Wednesdays to discuss work issues at Theismann's Restaurant next to the office or an outdoor café and they usually would have two beers. She said that McKenna insisted that her last performance appraisal, on October 26, 2019, at 3:00 p.m., be over drinks, and during her performance appraisals in 2017 and 2018, McKenna had her drink a shot of whiskey.

Daly-Sims said that going out drinking or to a strip club was always McKenna's idea and that she told him that she was concerned about getting in trouble. Daly-Sims felt like she was a target in the office because the employees in OGC had low morale due to a change in telework

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policy and that she was being swept up in the anger about that. As a single mother, Daly-Sims was afraid of losing her job, while McKenna did not have concerns because he was already eligible for retirement. When Daly-Sims raised her concerns, McKenna said that if anyone reported this to the Inspector General, they should just say they were offsite at a planning session. They did talk about work during these times. Daly-Sims cancelled several times with McKenna with the excuse that she was too busy. McKenna sometimes said she really needed to go and he knew that she was not that busy. Daly-Sims worried that she bore some responsibility and did not say no enough to McKenna.

Daly-Sims did not know of anyone else in OGC who went drinking or to strip clubs during the workday with McKenna. Daly-Sims was unsure of the level of knowledge the rest of OGC had regarding McKenna and her drinking and going to strip clubs. On some occasions, Daly-Sims returned to the office after she went out with McKenna because she was too intoxicated to drive home. On one such occasion, Daly-Sims said she saw Associate General Counsel Frank Kressman and said, "Fucking Mike keeps taking me out on these excursions and I don't like it, but I feel like I have to go." She did not think she shared any details with Kressman. On another occasion, Daly-Sims told Associate General Counsel Linda Dent that she was uncomfortable because she had "just been out with McKenna and wish[ed] [she] hadn't kept agreeing to do it but [she] felt like she could not not go."

McKenna and Daly-Sims went to the strip club in New York City in conjunction with an overnight work trip to New York City. The trip to New York occurred in the week between Christmas and New Year's Day in 2018 and Daly-Sims said there was "a little bit of a manufactured reason to go." She and McKenna did need to speak with outside counsel and an NCUA employee on a work matter and they met with them for about 1.5 hours.

After their meeting, McKenna and Daly-Sims went to dinner and drank a lot. While she was in the bathroom at the restaurant, she called a friend and told him that McKenna wanted to go to a strip club and that she really did not want to go, but felt that she had to go because McKenna was her friend, her boss, and was helping her get the NCUA General Counsel job (to replace him after he retired). After dinner, they went to Rick's Cabaret strip club. Daly-Sims said that this strip club was much more "touchy" than the ones in Washington, DC. (b)(6);(b)(7)(C)

(b)(6);(b)(7)(C)

There was no "backroom stuff" at any of the strip clubs they visited. Daly-Sims wanted to leave Rick's Cabaret much earlier but McKenna insisted that she stay. Daly-Sims guessed that McKenna was insistent because he had had a lot to drink.

The next morning McKenna and Daly-Sims met around 11:00 a.m. or 11:30 a.m. at a pub. McKenna gave Daly-Sims a marijuana edible that he had brought with him. Daly-Sims and McKenna consumed the marijuana edible during work hours before they returned to Alexandria. Daly-Sims did not want the marijuana edible because she was concerned about her top secret

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clearance. However, McKenna wanted Daly-Sims to consume the edible, although he did not force her to consume it. Daly-Sims did not know when or where McKenna purchased the edible. McKenna told Daly-Sims that he had smoked marijuana before and she was under the impression that he occasionally smoked marijuana.

After consuming the marijuana edible, McKenna and Daly-Sims went back to Rick's Cabaret because McKenna had left his credit card there the night before. Daly-Sims wanted to leave the strip club but McKenna insisted that they stay. After the strip club, McKenna and Daly-Sims caught their train back to Washington, DC. around 2:00 p.m. or 3:00 p.m. Daly-Sims stated that they were "out of it" on the train ride.

Daly-Sims first received her security clearance in 2017, before she consumed the marijuana edible. She had to complete paperwork recently to initiate the process for renewal of the clearance. She did not reference the edible but thought that was not part of what was asked on the paperwork, which was just a short form to initiate the process. During her initial clearance process, she disclosed that she had used marijuana in the past, but received her clearance and was warned by the CIA not to use marijuana again. The day after her interview, Daly-Sims contacted the RA and said that she had checked her security paperwork and realized that she must tell the Office of Continuity and Security Management about the marijuana edible and correct her paperwork. Daly-Sims had answered "no" to a question about anything changing since her last security clearance, which was inaccurate because of her drug use.

On December 11, 2019, Daly-Sims emailed the RA and the AIGI regarding two envelopes that she found while collecting personal items from her NCUA office on December 10, 2019. Daly-Sims claimed that the envelopes were McKenna's March Madness basketball bracket and his wager with her. Daly-Sims provided pictures of the envelopes and their contents in the email. (Exhibit 4)

On January 10, 2020, Daly-Sims resigned from the NCUA.

On January 27, 2020, through her attorney, Daly-Sims declined to participate in an interview with the OIG regarding discrepancies in her time and attendance.

B. Michael J. McKenna

On November 18, 2019, the RA and the AIGI interviewed General Counsel McKenna regarding allegations that he and Daly-Sims drank and went to strip clubs during the workday. (Exhibit 5)

The RA informed McKenna that the OIG's office had received allegations that members of OGC had offsite meetings where they drank heavily. McKenna informed the RA that he had no knowledge of this. The RA asked McKenna if he attended offsite strategic planning meetings.

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McKenna responded that he and Daly-Sims had three to four offsite strategic planning meetings in the last couple of years where they went downtown and to the National Harbor. When questioned on the downtown locations, McKenna stated that one of the locations was a “gentlemen’s club.”

McKenna stated that he and Daly-Sims went to a gentlemen’s club two to three times at lunch time or towards the end of the workday. McKenna’s workday was from 6:30 a.m. or 7:00 a.m. to 4:30 p.m. or 5:30 p.m. In response to the AIGI’s question, McKenna said he could not identify what time he was referring to when he said “towards the end of the workday.” He said they would spend 1 hour at the gentleman’s club when they went during the workday. McKenna estimated that he had two to three drinks at the gentlemen’s club. McKenna thought it was probably his idea the first time they went to a gentlemen’s club, but that Daly-Sims had previously mentioned that she had never been to a gentlemen’s club and wanted to go. He stated that he and Daly-Sims had an open communication style. Daly-Sims never objected to going and never stated she did not want to go. McKenna had two to three drinks when they went to the National Harbor.

While in New York City, McKenna and Daly-Sims went to a pub and afterwards to a gentlemen’s club, both at night. McKenna did not remember going to the gentlemen’s club the next day, although later, in response to the RA’s question, he said that it was possible that he returned to the gentleman’s club to retrieve his credit card. McKenna stated he had not used marijuana during the workday at the NCUA or at all since joining the Army in 1985. McKenna stated that he did not remember taking edible marijuana on the second day of his New York trip. McKenna never used his government issued credit card at the gentlemen’s club or for drinking during the day. McKenna had not gone to a gentlemen’s club by himself and had not gone drinking with someone else other than Daly-Sims during the day.

On January 2, 2020, the RA and the AIGI interviewed McKenna regarding the envelopes Daly-Sims had emailed us and regarding Daly-Sims’ time and attendance. (Exhibit 6)

Envelopes

The RA informed McKenna that Daly-Sims provided two handwritten envelopes that she said were from McKenna. The RA described the first envelope as having “Mike’s Picks” and “Bet to Follow” written on the front and “MM” and “3/14” on the back, and that the envelope contained a 2018 March Madness basketball bracket. McKenna stated that he and Daly-Sims would exchange March Madness brackets but did not bet money. The RA described the second envelope as having “Pay Up” written on the front and “MM” and “3/14/17” on the back. In this envelope were two sheets of paper; the first sheet was numbered “1” and stated, “We smoke a joint in your hot tub”; The second piece of paper was numbered “2” and stated, “We go

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downtown.” McKenna stated these were just jokes and that neither one happened and restated that no money was ever exchanged.

Daly-Sims’ Time and Attendance

Daly-Sims needed McKenna’s approval to telework. It was hard for him to remember how often she teleworked because for different years, there were different things going on with her.

In November or December 2016, McKenna became concerned that Daly-Sims was not working 40 hours a week. There was a particularly heavy workload in OGC at that time, so McKenna was especially concerned that Daly-Sims might not be working her hours. He arrived at work before 7 a.m. and she did not arrive until 9 a.m., which meant she should be leaving later. Accordingly, he obtained Daly-Sims’ garage entrance and exit information. The garage information did not match what she provided on her timesheets. McKenna confronted Daly-Sims with this information. In 2017, Daly-Sims seemed to be working her hours, but in 2018 and 2019, there were problems again. When McKenna questioned Daly-Sims about her hours, she stated that she worked at night on special projects for Board staff on top of her regular work. McKenna only remembered one occurrence of Daly-Sims not coming into the office at all when she was supposed to, which was in 2019. McKenna told Daly-Sims that she had to take leave. Daly-Sims responded that she had been working on a special project for Board staff and did not need to take leave. McKenna was too busy with his own work and could not therefore keep track of when Daly-Sims was coming and going, and had to rely on what she told him. If Daly-Sims did not work her hours, she misled him. McKenna did not have any recollection of Daly-Sims frequently working from 10 a.m. to 2 p.m., but he noted that he spent a lot of time on the seventh floor (versus the sixth floor, where OGC was located). If Daly-Sims left the building without telling him, that would have been a problem.

Daly-Sims traveled a couple times a year for the NCUA. McKenna remembered Daly-Sims traveled for a NCUA regional conference, a trip to Palm Springs, and to give a couple of speeches. Daly-Sims hardly ever attended outside meetings because McKenna attended them.

Daly-Sims definitely did not telework every night, as he would have had to approve that. When NCUA switched to HR Links, it became even harder to keep track of her time because of the new allowance for a variable work schedule. Daly-Sims’ time and attendance issues were not common knowledge. OGC’s timekeeper may have known about the issues. The Chief Financial Officer (CFO) knew about it because he provided McKenna the garage information in November or December 2016. Deputy Executive Director Kutchev approved the CFO providing the garage information to McKenna. McKenna shredded the garage information when he was packing up his office prior to retiring.

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McKenna was under the impression Daly-Sims worked 80 hours each pay period. If she did not, that meant she misled him. Daly-Sims and her children had doctor appointments. Daly-Sims did not work overnight or stay in the office until very late at night working. However, Daly-Sims would sometimes leave her car in the garage and take the metro into work the next day. A 30-minute lunch was required if an NCUA employee, including Daly-Sims, worked 8 hours.

C. Linda Dent

On November 18, 2019, and November 19, 2019, the RA and the AIGI interviewed Associate General Counsel Linda Dent regarding the allegations that McKenna and Daly-Sims drank and went to strip clubs during the workday. (Exhibit 7)

Dent had never noticed Daly-Sims or McKenna with alcohol on their breath or being inebriated during the workday. Dent remembered one instance seeing Daly-Sims lying down in her office at 5 p.m. or later. Daly-Sims told Dent that she had been out drinking earlier and was lying down before she went home. Daly-Sims did not smell like alcohol and did not appear to be inebriated. Dent said that Daly-Sims was not necessarily drinking during work hours as she could have left work at 3:30 p.m. or 4:00 p.m. and gone to a happy hour. Dent assumed that the drinking event was work-related.

The following day, on November 19, 2019, Dent came to the OIG's office because after her November 18 interview, she had some concerns about what she could not recall during her interview. So, that night, Dent called a close friend and asked her if she had ever told her about people at work going to strip clubs. The friend informed Dent that Dent had told her that the NCUA Deputy General Counsel (Daly-Sims) had gone to a strip club and had not wanted to go. Dent had no memory of this herself. Dent thought her friend remembered this because she had a similar experience at work.

D. Frank Kressman

On November 18, 2019, the RA and the AIGI interviewed Deputy General Counsel Frank Kressman regarding allegations that McKenna and Daly-Sims drank and went to strip clubs during the workday. (Exhibit 8)

Kressman said that approximately a year and a half ago, before Kressman became Deputy General Counsel, he bumped into Daly-Sims in the hallway as he was leaving at the end of the day and had a 2-second conversation with her in which she said that she had been out somewhere with McKenna but did not provide any other details. Kressman had never smelled alcohol on Daly-Sims or McKenna during the workday. Kressman had never gone out drinking with Daly-Sims or McKenna during the workday.

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E. Analysis of Daly-Sims' Time and Attendance Records

On January 15, 2020, the RA completed an analysis of Daly-Sims' time and attendance for the period of April 3, 2017, through November 9, 2019. (Exhibit 9)

The RA compared Daly-Sims' timesheets with her Outlook calendar, travel records, and the duration she was parked in the NCUA parking garage. The analysis was restricted to the time period beginning April 3, 2017, because records for the parking garage were not available before then. The RA also reviewed Daly-Sims' PIV card reader activity to determine her entrances into the office to ensure that she was credited with working when she was in the office but did not use the NCUA parking garage. In calculating the required workday, 30 minutes was added to any workday that was 8 hours or longer to account for the 30-minute uncompensated lunch break that is required by NCUA Personnel Manual, Chapter 19, for such workdays.

Daly Sims' Outlook calendar indicated three personal appointments on days with a deficit in time worked and no corresponding leave on her timesheet.

Including these three instances, the RA's analysis of Daly-Sims's time and attendance for the period of April 3, 2017, through November 9, 2019, determined that Daly-Sims did not work 374 hours that she had claimed on her timesheets. Out of the 718 total days the RA reviewed, 359 days indicated a deficit.

Daly-Sims's hourly rate was \$125.54 on her Earnings and Leave Statement for Pay Period 1 of 2017 (December 25, 2016, to January 7, 2017) and later increased to \$126.02 on her Earnings and Leave Statement for Pay Period 1 of 2019. (Exhibit 10) Daly-Sims received \$46,951.96 in salary for 374 hours that she overstated on her timesheets for the period of April 3, 2017, through November 9, 2019, based on the \$125.54 hourly rate in effect on April 3, 2017.

D. Mark Treichel

On January 27, 2020, the RA and the AIGI interviewed NCUA Executive Director Mark Treichel regarding McKenna's decision to retire. (Exhibit 11)

On November 19, 2019, Treichel told McKenna that the NCUA Chairman was considering having McKenna drug tested. Treichel informed McKenna that he expected that McKenna would be required to take a drug test and be placed on administrative leave. McKenna responded by saying he would "pee in a cup right now" and said he went to a strip club twice. Treichel told McKenna that he did not think McKenna would be at the NCUA Board meeting on November 21, because he thought McKenna would be on administrative leave before then. McKenna called Treichel a couple hours later and told Treichel that he was retiring. Treichel

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thought that McKenna retired because he did not want to go through the embarrassment of not being at the Board meeting because he was on administrative leave.

List of Exhibits

- Exhibit 1: Memorandum of Interview, Lara Daly-Sims, November 18-19, 2019
- Exhibit 2: Memorandum of Interview, Lara Daly-Sims, December 4, 2019
- Exhibit 3: Email from Lara Daly-Sims to RA and AIGI, December 5, 2019
- Exhibit 4: Email from Lara Daly-Sims to RA and AIGI, December 11, 2019
- Exhibit 5: Memorandum of Interview, Michael McKenna, November 18, 2019
- Exhibit 6: Memorandum of Interview, Michael McKenna, January 2, 2020
- Exhibit 7: Memorandum of Interview, Linda Dent, November 18-19, 2019
- Exhibit 8: Memorandum of Interview, Frank Kressman, November 18, 2019
- Exhibit 9: Memorandum of Activity, Analysis of Lara Daly-Sims' Time and Attendance Records, January 15, 2019
- Exhibit 10: Lara Daly-Sims' Earnings and Leave Statement, pay period December 25, 2016, to January 7, 2017
- Exhibit 11: Memorandum of Interview, Mark Treichel, January 27, 2020