Summary: Former Supervisory Procurement Analyst Violated Ethics Regulations, DOI Policy, and Federal Law

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The OIG investigated allegations that Tiffany Harvey, former Supervisory Procurement Analyst (GS-15), Office of Acquisition and Property Management, Immediate Office of the Secretary, U.S. Department of the Interior (DOI), used Government property for unauthorized purposes in violation of the Standards of Ethical Conduct for Employees of the Executive Branch, 5 C.F.R. Part 2635 (Standards of Ethical Conduct) and DOI's Limited Personal Use of Government Office Equipment and Library Collections policy (Limited Use Policy). We also investigated allegations that Harvey used her official time on non-official duties in violation of the Standards of Ethical Conduct and that Harvey failed to disclose her outside employment during her background security screening process and on multiple Confidential Financial Disclosure Reports (OGE Form 450). Additionally, we investigated whether Harvey received additional pay for extra services in violation of 5 U.S.C. § 5536. Finally, we investigated allegations that Harvey's outside employment conflicted with her official duties in violation of the Federal criminal conflict of interest statutes, Standards of Ethical Conduct, and DOI supplemental ethics regulations. We substantiated some of these allegations.

We found that Harvey failed to disclose her personal business, TLHarvey Investments, LLC, during her background security screening and on two OGE Form 450s over the course of four years. We also found that Harvey violated the Standards of Ethical Conduct and DOI's Limited Use Policy by using Government property and official time to conduct commercial gain activities related to TLHarvey Investments, LLC. Finally, we found that Harvey violated 5 U.S.C. § 5536 by certifying to be in regular work status with the DOI while also serving on active duty military orders, which resulted in her improperly receiving both military and DOI pay.

We found that Harvey did not violate the Federal criminal conflict of interest laws 18 U.S.C. § 203 and § 205 because the services she provided through TLHarvey Investments, LLC were not the type of representational services prohibited under those statutes. We also found that Harvey did not violate 5 C.F.R. § 2635.802 because the activities Harvey performed through TLHarvey Investments, LLC did not conflict with her official duties as a Supervisory Procurement Analyst. Finally, we determined that Harvey was not required under DOI's supplemental ethics regulation, 5 C.F.R. § 3501.105(b), to obtain prior approval from DOI to operate TLHarvey Investments, LLC because the evidence did not show that her outside employment activities involved a "prohibited source" as defined under the regulation.

In accordance with the Attorney General Guidelines for Offices of Inspector General with Statutory Law Enforcement Authority, we referred our findings to the U.S. Department of Justice, which declined to prosecute the matter.

This is a summary of an investigative report we provided to the Director of the Office of Acquisition and Property Management for any action deemed appropriate.