



Report of Investigation Regarding Alleged
Unauthorized Contacts by Federal Bureau of
Investigation Employees with the Media and Other
Persons in Advance of the 2016 Election

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21-104

AUGUST 2021

I. Introduction and Background

In June 2018, the Department of Justice (DOJ) Office of the Inspector General (OIG) released a [*Review of Allegations Regarding Various Actions by the Department and the Federal Bureau of Investigation \(FBI\) in Advance of the 2016 Election*](#) (2016 pre-election report). Among the issues we reviewed in that report were allegations that FBI employees improperly disclosed non-public information regarding the FBI's investigation into former Secretary of State Hillary Clinton's use of a private email server. FBI policies strictly limit the employees who are authorized to speak to the media, and require all other employees to coordinate with or obtain approval from the FBI's Office of Public Affairs (OPA) in connection with such communications. (See, e.g., Section 2.4 of the Public Affairs Manual and Section 3.1 of the Media Relations at FBI Headquarters and in Field Offices Policy Guide).

Nonetheless, as described in our 2016 pre-election report, we found that these policies appeared to be widely ignored during the period we reviewed. Specifically, in our analysis of FBI telephone records, FBI email records, FBI text, and Microsoft Lync instant messages, we identified numerous FBI employees, at all levels of the organization and with no official reason to be in contact with the media, who were nevertheless in frequent contact with reporters.

The 2016 pre-election report also stated that the OIG would continue to examine allegations that Department and FBI employees improperly disclosed non-public information, particularly during the April/May and October 2016 time periods. We also noted that the OIG had identified social interactions between FBI employees and reporters that might have violated FBI policy and Department ethics rules, and that the OIG would separately report on these individual misconduct investigations, as they were concluded, consistent with the Inspector General Act of 1978 (IG Act), other applicable federal statutes, and OIG policy.¹

Since issuing the 2016 pre-election report, the OIG has conducted substantial additional investigative work concerning these allegations and, consistent with the IG Act, publicly disclosed findings of misconduct related to three individual investigations involving then senior FBI officials. First, on October 16, 2018, the OIG released a [summary](#) of findings of misconduct by an FBI Official for Accepting Gifts From Members of the Media and for Lack of Candor. Second, on May 29, 2019, the OIG released a [summary](#) of findings of misconduct by an FBI Deputy Assistant Director for Unauthorized Contacts with the Media, Disclosing Law Enforcement and Other Sensitive Information to the Media, and Accepting a Gift from the Media. And, third, July 20, 2021, the OIG released a summary of misconduct by a former senior FBI official who had numerous unauthorized contacts with members of the media between January and November 2016, which included unauthorized social engagements involving drinks, lunches, and dinners in violation of FBI policy.

In addition, during the OIG's broader investigation into unauthorized disclosures, the OIG determined that dozens of other FBI employees had contact with certain members of the news media who had reported on non-public information about ongoing criminal investigations during the relevant time

¹ DOJ OIG, [*Review of Allegations Regarding Various Actions by the Department and the Federal Bureau of Investigation \(FBI\) in Advance of the 2016 Election*](#), Oversight and Review Division Report 18-04 (June 2018), p. 430, <https://oig.justice.gov/reports/review-various-actions-federal-bureau-investigation-and-department-justice-advance-2016>.

periods in 2016. We determined this information from reviewing FBI records and through forensic examination of FBI electronic devices, as described below. A limited number of those FBI records, such as text messages, revealed the substance of those communications, most often when the employee involved was assigned to a public affairs role and the content reflected an official exchange. However, most of those FBI records—such as telephone logs—did not reflect the substance of the communication, but only the fact of the contact between the two telephone numbers. Because this was a non-criminal administrative misconduct review, there was no legal basis to seek a court order to compel Internet service providers to produce to the OIG the content of any personal email communications for these FBI employees. Additionally, consistent with OIG practice, the OIG did not seek to compel reporters, or the reporters' telephone or Internet service providers, to produce call or email logs or other records.² For the reasons provided below, the OIG is referring six of these employees to the FBI for it to determine whether their media contacts warrant disciplinary or other corrective action.

Although some of these media contacts were authorized under the FBI's media policy, particularly those contacts by individuals working in the FBI's OPA, many of the others were not. Most of the FBI employees interviewed by the OIG acknowledged their media contacts but denied sharing any non-public law enforcement information during those contacts. Employees interviewed by the OIG generally claimed that they believed their contacts were either authorized by OPA or a field office Special Agent in Charge (SAC) or Assistant Director in Charge (ADIC) to provide background about an FBI initiative or completed investigation, or were personal in nature. Given the absence, in most instances, of any documentary evidence reflecting the substance of these communications, the OIG was unable to determine whether these communications were consistent with the explanations provided by the FBI employees or instead involved the sharing of non-public information with reporters. The OIG received various investigative leads about specific individuals, which helped narrow the focus of the investigation from the dozens of FBI employees who had contact with the reporters. However, the number of employees in communication with these reporters still remained substantial, making it exceedingly difficult, absent an admission, to determine whether any of these FBI employees had in fact disclosed non-public information. Thus, these leads did not ultimately result in the identification of the source(s) of the alleged unauthorized disclosures of non-public information described in the 2016 pre-election report. Accordingly, with the issuance of this report and the July 20, 2021 summary of misconduct findings, the OIG has completed its investigations related to the improper disclosures of non-public information described in the 2016 pre-election report.

Section I below describes corrective actions taken by the FBI in response to the OIG's 2016 pre-election report and the report's stated concerns about a cultural attitude within the FBI that was too permissive of unauthorized media contacts. Section II details the investigative steps taken by the OIG in an effort to identify the sources of non-public information about ongoing criminal investigations during the relevant time periods in 2016.

² In conducting this investigation, the OIG also was cognizant of federal laws and DOJ policies that protect whistleblowers from reprisal, including laws and Merit Systems Protection Board (MSPB) precedent that prohibit investigations that are initiated in response to a protected disclosure. However, none of the individuals we interviewed claimed to have made a protected disclosure, and the OIG did not determine that any of the non-public information disclosed to the media in 2016 was evidence of waste, fraud, abuse, or other misconduct (See, 5 U.S.C. §§ 2302 (whistleblower protections for Department of Justice employees) and 2303 (whistleblower protections for FBI employees)).

II. Factual Findings and Analysis

A. Corrective Actions Taken by the FBI in Response to the OIGs 2016 Pre-Election Review and Subsequent Findings of Misconduct by Senior FBI Officials

The OIG's 2016 pre-election report identified unauthorized media contacts by Department and FBI officials as a significant problem, and made two recommendations to address this issue. In describing the problem, the 2016 pre-election report noted that "the harm caused by leaks, fear of potential leaks, and a culture of unauthorized media contacts is illustrated [throughout this report], where we detail the fact that these issues influenced FBI officials who were advising then [FBI] Director Comey on consequential investigative decisions in October 2016."

In November 2017, during the OIG's 2016 pre-election review, the FBI updated its media policy, restating its strict guidelines concerning media contacts and identifying which employees are required to obtain authority before engaging members of the media, and when and where to report media contact. Although the updated media policy improved on the prior version of the policy, we noted in the 2016 pre-election report that, "We do not believe the problem is with the FBI's [2015 media] policy, which we found to be clear and unambiguous." Rather, we concluded that the leaks of non-public law enforcement information in 2016 highlighted the need to change a "cultural attitude" in the FBI that was too permissive of unauthorized media contacts and disclosures of non-public information.

Indeed, at a conference for FBI SACs in April 2017, FBI leadership informed the SACs of FBI leadership's intent to further tighten rules on media contacts and the pending change to the media policy. Within hours of this discussion, and months before the FBI officially adopted and announced the new media policy, a national news organization reported on the media policy change discussion at the conference, citing unnamed FBI officials who were in attendance.

The three misconduct investigations dated October 16, 2018; May 29, 2019; and July 20, 2021; referenced above, further exemplify the breakdown of the culture within the FBI relating to media relations. Indeed, the July 20, 2021 investigation found that the senior official knowingly disregarded the FBI's policy that required any contacts with the media to be coordinated through the FBI's OPA, directed his subordinates to do the same, and requested that reporters contact him directly and not go through OPA.

In its formal response to the OIG's 2016 pre-election report, the FBI characterized the OIG's conclusion that there is a need to change the "cultural attitude" regarding media contacts and leaks at the FBI as "troubling." The FBI further noted that it "is acutely aware of the damage unauthorized communications or leaks can cause to investigations, prosecutions, the personal lives of those involved in the case or who may be subjects or targets, and the reputation of the Bureau." In light of these concerns, the OIG made two recommendations, including that the FBI evaluate whether:

- (A) it is sufficiently educating its employees about both its media contact policy and the Department's ethics rules, and
- (B) its disciplinary penalties are sufficient to deter such improper conduct.

In response to the OIG's recommendations, the FBI informed the OIG that it had updated its "Fundamentals Training," which is provided to nearly all FBI employees (99 percent, or 36,422 employees, as of June 2020). According to a copy of the presentation and speaker notes provided by the FBI to the OIG, this training includes discussion of the findings and recommendations in the OIG 2016 pre-election report, and highlights the importance of following FBI policies and procedures and doing things "by the book," including an emphasis on policies related to media contacts and gifts. For example, the training addresses the requirements in the November 2017 FBI Public Affairs Policy Guide and Department media policy, including the following:

- It identifies which FBI employees are authorized to speak to the media and what approvals are required.
- It states that FBI personnel interacting with members of the media must maintain a professional relationship and abide by the rules covering gifts and the use of mobile devices, which rules are covered separately in the training.
- It discusses the "strict guidelines" governing what information can be shared with the media, including the guidelines at 28 C.F.R. § 50.2 and in the Justice Manual, and the requirement to discuss only factual matters, not subjective assessments.
- It states that FBI personnel must notify their Public Affairs Officer in the event of any media contact, including unintentional or unplanned contact.
- It states that FBI personnel must notify their supervisors immediately if any media contact involves any classified or grand jury information.

With respect to part (B) of this recommendation, the FBI provided the OIG with a copy of an FBI OPR memorandum dated June 19, 2018, setting forth the FBI Offense Codes that apply to media leaks and unauthorized disclosures, as well as Penalty Guidelines for violations of these provisions that range from a letter of censure (i.e., a written reprimand placed in an employee's personnel file for a certain period of time) to dismissal. The FBI OPR memorandum concluded that the current FBI disciplinary penalties are sufficient to deter unauthorized contact with the media, improper acceptance of gifts, and other misconduct. The memorandum also noted that the Assistant Director of OPR has the authority to deviate from the Penalty Guidelines to impose whatever penalty is required in a given case, and that this authority, while rarely invoked, is available to ensure that misconduct receives the penalty it warrants.

While on paper both the training and the OPR memorandum appear to address the concerns underlying the OIG's recommendations, as indicated by our 2016 pre-election report and subsequent misconduct reports, we believe the FBI needs to ensure that it takes appropriate disciplinary action when it determines that employees have violated its media contact policies. Thus, although we have closed our recommendation related to education and enforcement of the FBI's media policy, we encourage the FBI to remain vigilant in its efforts to improve FBI culture regarding unauthorized media contacts.

B. Additional Investigative Steps Taken by the OIG

1. The OIG was Unable to Identify the Source(s) of Disclosures of Non Public Information about Ongoing FBI Criminal Investigations in 2016

Although the OIG's investigations into unauthorized disclosures established misconduct by multiple senior officials related to their unethical interactions with reporters, the OIG was unable to identify the source(s) of the alleged disclosures of non-public information that occurred in the April/May and October 2016 time periods. The 2016 pre-election report discussed the challenges associated with this effort:

Our ability to identify individuals who have improperly disclosed non-public information is often hampered by two significant factors. First, we frequently find that the universe of Department and FBI employees who had access to sensitive information that has been leaked is substantial, often involving dozens, and in some instances, more than 100 people.

Second, although FBI policy strictly limits the employees who are authorized to speak to the media, we found that this policy appeared to be widely ignored during the period we reviewed. We identified numerous FBI employees, at all levels of the organization and with no official reason to be in contact with the media, who were nevertheless in frequent contact with reporters. The large number of FBI employees who were in contact with journalists during this time period impacted our ability to identify the sources of leaks. For example, during the periods we reviewed, we identified dozens of FBI employees that had contact with members of the media.

During the investigation, the OIG requested and obtained records from the FBI indicating which FBI officials used FBI equipment or devices to communicate with media members who had reported on non-public, ongoing FBI criminal investigations in 2016.³ In response to the OIG's request, the FBI provided records indicating that 52 FBI employees had contact with one or more of the relevant reporters, using their government issued devices, in April and May 2016, and that 33 FBI employees had contact with one or more of the relevant reporters, using their government issued devices, in October 2016.

The OIG interviewed a total of 56 FBI employees and former employees who were identified as having contact with the relevant media members who had reported on non-public investigations during the April/May and October 2016 time periods.⁴ Although nearly all of the interviewed employees acknowledged

³ The alleged disclosures of non-public information in the April/May 2016 time frame were made to reporters who wrote articles about a previously undisclosed ongoing criminal investigation. The alleged disclosures of non-public information in October 2016 were made to reporters who wrote stories about FBI actions in advance of the 2016 presidential election, including the re-opening of the Hilary Clinton email investigation and the Clinton Foundation investigation, as well as alleged disclosures to Rudolph Giuliani.

⁴ Although the OIG attempted to interview every employee who was identified as having contacts with these reporters, some of the employees retired or resigned prior to being interviewed by the OIG and declined to appear voluntarily. The OIG has the authority to compel testimony from current Department employees upon informing them that their statements will not be used to incriminate them in a criminal proceeding. The OIG does not have the authority to compel or subpoena testimony from former Department employees, including those who retire or resign

(Cont'd.)

their 2016 media contacts when confronted with records demonstrating such contacts, the employees all denied providing non-public information related to ongoing criminal investigations to the reporters with whom they had contact, and many employees also indicated that they believed they were authorized under FBI policy and/or by a supervisory official in their office to have and maintain media contacts. While the FBI's 2015 media policy authorized the SAC or ADIC of an FBI field office to designate media coordinators or contacts, the 2015 FBI media policy did not authorize senior officials at FBI headquarters to designate media coordinators or contacts, and required all media contacts to be coordinated through the OPA. We determined that six employees at FBI headquarters who did not work in the OPA had contacts with the media, and as noted above, we are referring these employees to the FBI for it to determine whether their media contacts warrant disciplinary or other corrective action.

As noted previously, the number of FBI employees who had contacts with the relevant reporters during these periods made identifying the source of the disclosures of non-public information exceptionally challenging. In addition to the dozens of FBI employees who were identifiable because they had contacts with the reporters using their FBI-issued devices, many dozens of additional employees had access to the non-public information as part of their official responsibilities. Additionally, the total number of employees identified as having contacts with media members using their official devices does not account for the possibility that non-public information could have been disclosed by employees to media members either through personal meetings, or using personal devices.

The OIG took additional investigative steps to attempt to identify the source(s) of disclosures of non-public information about ongoing FBI criminal investigations in 2016. During our investigation, senior FBI witnesses provided information to the OIG about their suspicions of possible sources, while acknowledging that they had no direct evidence that these possible sources had in fact engaged in misconduct. In response, the OIG requested that the FBI provide all text and electronic messages from official devices and computers for those employees who had generated suspicions among their colleagues, and certain other employees that may have been in frequent contact with these employees, for the relevant time periods in 2016.⁵

The OIG reviewed these employees' use of FBI systems to communicate by Microsoft Lync instant messages. Additionally, the OIG reviewed text messages from FBI-issued cellular phones for most of these

during the course of an OIG investigation. Additionally, there was some overlap between the lists of employees with media contacts in April/May and the list of identified employees in October 2016. Accordingly, the OIG interviews of 56 personnel included most, but not all, of the FBI employees with identified media contacts in the relevant time periods.

In connection with the specific misconduct investigations of the high-ranking officials, the OIG interviewed additional FBI employees who were not identified by the FBI as having contacts with the media but who nonetheless had information relevant to the investigations.

⁵ The OIG also requested and received all text and other electronic communications for the three senior officials, described above, who engaged in misconduct related to their interactions with media members. Although the content of these communications indicated evidence of misconduct, as described in the investigative summaries, the content did not indicate that any of these individuals were the sources of the disclosures of non-public information discussed in the pre-election report.

employees for the period in question. However, the FBI informed the OIG that a gap in its text message data collection affected the FBI's ability to comply with the OIG's request for text messages for four of the identified individuals.⁶ After the FBI informed the OIG of the missing text messages for the four employees, the OIG requested to take physical custody of the FBI-issued cellular phones for these employees. The OIG received Samsung Galaxy S7 devices that had been assigned to the four employees, and recovered text messages from these phones for the early 2017 time period.⁷ However, the FBI could not locate the employees' previously assigned Samsung Galaxy S5 devices, which would have had text messages for the relevant time periods in 2016. Accordingly, the OIG was unable to review the 2016 text messages for four of the employees identified by senior FBI witnesses as being potential sources of disclosures of non-public information in 2016.

The OIG's review of the electronic information for the identified employees', including their Lync messages, FBI-produced text messages, and the recovered text messages from the four Samsung Galaxy S7s indicated that all of these employees had at least some contact with the media. However, the review of these electronic communications did not provide information indicating that any of these employees were the source of non-public information that was shared with reporters who wrote about certain on-public ongoing criminal investigations in 2016.

a. Public Statements by Rudolph Giuliani

On October 26, 2016, Rudolph Giuliani appeared as a guest on a television program, and was asked about the presidential campaign of then-candidate Donald Trump, for whom Giuliani was serving as an advisor. Giuliani expressed confidence about then-candidate Trump's prospects in the upcoming election during his televised interview, noting, "I think he's got a surprise or two that you're going to hear about in the next few days. I mean, I'm talking about some pretty big surprises." Two days later, on October 28, 2016, then FBI Director Comey informed Congress that the FBI was re-opening the FBI's investigation into

⁶ In December 2018, the OIG issued a [report](https://oig.justice.gov/reports/2018/i-2018-003523.pdf), "Recovery of Text Messages From Certain FBI Mobile Devices," that provides further information on the gap in text message data collection impacting the FBI's ability to recover electronic messages on certain FBI mobile devices for parts of 2016 and 2017. The report is available at: <https://oig.justice.gov/reports/2018/i-2018-003523.pdf>.

⁷ After making the request for these cellular phones, the OIG received an allegation that an FBI Assistant Special Agent in Charge (ASAC) may have engaged in misconduct when the ASAC requested a Supervisory Special Agent (SSA) relay knowingly false information to the chain of command concerning the collection of this evidence. The ASAC had been informed by another employee that his phone had been requested by the OIG as part of this administrative investigation, and the ASAC asked the SSA to permit the ASAC to tell the ASAC's chain of command that the ASAC learned about the OIG request for the phone from the SSA, rather than the actual source of such information, which was the other employee. The SSA declined the ASAC's request, and the ASAC never followed through with the proposed false statement to the chain of command. The OIG concluded that the ASAC engaged in administrative misconduct when the ASAC asked the SSA to participate in conveying knowingly inaccurate information to the chain of command, in violation of FBI policy. A summary of this misconduct is available at: https://oig.justice.gov/sites/default/files/reports/21-039_0.pdf.

The OIG did not find any indications that the data on any of the cell phones provided to the OIG in response to the OIG's request were manipulated or altered.

whether then-candidate Hillary Clinton or her aides had mishandled classified information.⁸ Later on October 28, on a radio program, Giuliani discussed “rumors” he had been hearing about the Hilary Clinton email investigation from “former agents, and even from a few active agents, who obviously don’t want to identify themselves.”

As a result of the content and timing of these public statements by Giuliani suggesting that current or former FBI personnel may have provided non-public investigative information to him, the OIG contacted Giuliani, who agreed to appear for a voluntary interview. The OIG asked Giuliani about the comments described above, and others he made that potentially indicated misconduct by FBI personnel in October 2016.⁹ Giuliani told the OIG that he had not received any information about any ongoing FBI investigations, including then Director Comey’s decision to re-open the Hillary Clinton email investigation. In response to a specific question about the October 28 notification to Congress concerning the Hillary Clinton email investigation, Giuliani responded, “[Director] Comey’s statements were a shock to me. I had no foreknowledge of any of them.” Giuliani also said he had not been in contact with any active FBI agents in October 2016, and stated that he had only spoken with former agents who did not have any direct or indirect knowledge of FBI investigations in October 2016, and that the extent of his conversations with former agents was “gossip” about Comey’s decision-making in 2016. He stated that his use of the term “active” was meant to refer to retired FBI agents who were still actively working in security and consulting.

In addition to having interviewed Giuliani, the OIG further assessed the prospect that FBI employees may have disclosed non-public information to Giuliani in advance of the 2016 election by requesting that the FBI determine which employees, if any, had been in contact with Giuliani using their FBI-issued devices during the period of January 2016 to May 2017. The FBI identified four employees whom it believed had contact with Giuliani during this period. The OIG interviewed the four agents and all of them stated that they had not had contact with Giuliani, even after being confronted with the information provided by the FBI. After interviewing the four agents, the OIG requested additional information from the FBI about the basis for its conclusion that the four agents had been in contact with Giuliani using their FBI devices. In a memorandum to the OIG, the FBI stated it had determined that the employees had used their FBI devices to contact telephone numbers attributed to Giuliani. The OIG determined that the numbers used by the FBI were for the general telephone line for the New York office of the law firm at which Giuliani was a partner during the relevant time frames, and two other general telephone lines for businesses at which Giuliani had not been affiliated since at least 2007. The telephone numbers attributed by the FBI to Giuliani were not, therefore, specific to Giuliani. Accordingly, the purported investigative leads provided by the FBI based on alleged FBI employee contacts with Giuliani were inaccurate.

⁸ The 2016 pre-election report discusses in detail then Director Comey’s decision to notify Congress about the FBI’s decision to re-open the Hilary Clinton email investigation. As noted, the pre-election report found that fear of unauthorized disclosures was a factor that influenced FBI officials who were advising then Director Comey on this decision in October 2016.

⁹ Giuliani has publicly acknowledged being interviewed by the OIG. (See, e.g., “Investigators Questioned Giuliani as Part of Leak Inquiry, He Says.” *The New York Times*. June 19, 2018. Available at: <https://www.nytimes.com/2018/06/19/us/politics/giuliani-questioned-leak-investigation.html>).

III. Conclusion

The OIG's investigation into alleged unauthorized disclosures of non-public information about ongoing FBI criminal investigations in 2016 resulted in findings of misconduct against three senior FBI officials for unethical interactions with reporters and the identification of other FBI employees who had contact with certain members of the news media who reported on non-public information about ongoing criminal investigations during the relevant time periods in 2016. The misconduct by these three senior officials, and the substantial media contacts identified by the OIG involving numerous other FBI employees, evidenced a cultural attitude at the FBI that was far too permissive of unauthorized media contacts in 2016. As noted, the OIG is referring six additional employees to the FBI for it to determine if their media contacts during this time period warrant disciplinary or other corrective action. The available evidence, however, did not enable the OIG to determine whether these media contacts resulted in the disclosure of non-public information as described in the 2016 pre-election report.

The unauthorized disclosure of non-public information during the course of an ongoing criminal investigation can potentially impair the investigation, can result in the disclosure of sensitive law enforcement information, and is fundamentally unfair to the subject or target of the investigation. Moreover, as described in the 2016 pre-election report, it can lead to law enforcement officials making recommendations and decisions due to a fear of potential unauthorized disclosures. Since the 2016 pre-election report, the FBI has taken steps in response to the OIG's recommendations to improve the FBI's cultural attitude regarding unauthorized contacts with the media, including by improving training and aligning its disciplinary penalties so that they are sufficient to deter unauthorized contact with the media. We believe it is important for the FBI to remain vigilant in these efforts.

Appendix: The FBI's Response



U.S. Department of Justice

Federal Bureau of Investigation

Inspection Division

Washington, D.C. 20535 - 0001

August 2, 2021

Dear Inspector General Horowitz:

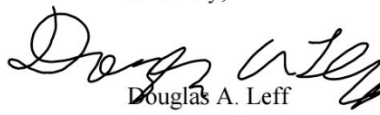
Thank you for the opportunity to review the Office of the Inspector General's (OIG) Report of Investigation Regarding Alleged Unauthorized Contacts by Federal Bureau of Investigation (FBI) Employees with the Media and Other Persons in Advance of the 2016 Election (Report).

As noted by the OIG, the unauthorized disclosure of non-public information during an ongoing criminal investigation can potentially impair the investigation, can result in the disclosure of sensitive law enforcement information, and is fundamentally unfair to the subject or target of the investigation. As you are aware, the FBI previously took action to strengthen procedures related to media contacts. Specifically, based on the OIG's findings in an earlier, related report titled Review of Allegations Regarding Various Actions by the Department and the FBI in Advance of the 2016 Election (June 2018), the FBI further restricted and clarified authorized media contact in policy and instituted formal training requirements for all FBI personnel on the policy. In 2018, updated media policy training was included in a three-hour mandatory training module covering multiple topics raised in the OIG's June 2018 report. Beginning in 2019, all FBI personnel must annually review the media policy and confirm that they have completed the media policy training. In addition, the FBI reviewed its disciplinary policies associated with unauthorized media contacts, and violations are subject to penalties ranging up to and including dismissal. Based on these important steps, the OIG previously closed its recommendation related to education and enforcement of the FBI's media policy.

The FBI will continue to be vigilant with its enforcement of the media policy. To this end, the FBI will promptly investigate and take disciplinary action as appropriate regarding the few remaining onboard employees referenced in the Report who were referred back to the FBI for further action.

Thank you for your attention to this matter.

Sincerely,


Douglas A. Leff
Assistant Director