A Review of the FBI's Actions in Connection With Allegations Raised By Contract Linguist Sibel Edmonds

Office of the Inspector General
Office of Oversight and Review
July 1, 2004
I. INTRODUCTION (U)


On March 22, 2002, the FBI stopped using Edmonds' translation services and on March 26 terminated her contract. (U)
II. OIG INVESTIGATION (U)

During the course of our investigation, the OIG interviewed more than 50 individuals, including FBI employees, contractors, and Department of Justice (DOJ) officials. The OIG interviewed Edmonds on three separate occasions in April, June, and November of 2002. On January 28, 2004, the OIG wrote to Edmonds' attorney offering to meet with Edmonds again if she had additional relevant information to provide to the OIG. Her attorney said that Edmonds did not believe she had anything additional to provide the OIG, and the attorney did not request an additional meeting. In addition, we obtained and reviewed thousands of pages of FBI documents relating to Edmonds' allegations, including e-mails, notes, and other records. We also sought from another federal government agency outside the DOJ expert assistance with translations and other matters. (U)

The FBI conducted a classification review of this report and classified the report at the secret level. The paragraphs of the report that the FBI has classified as secret are marked. (U)
III. BACKGROUND (U)

In this section of the report, we provide brief biographical and background information on Edmonds. We also describe the FBI's Language Service Section, which manages the FBI's language program and its linguists.

A. Edmonds (U)

1. Biographical Information (U)

Before joining the FBI, Edmonds handled retail sales for her husband's camera business. Edmonds also worked as a volunteer at the Alexandria, Virginia courthouse as a court-appointed special advocate for children and for the Rostropovich foundation, a non-profit organization that delivers medical supplies and food to a children's hospital in St. Petersburg, Russia. Edmonds also served as a corporate officer (Secretary) for her husband's network computer consulting business. (U)

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According to various media accounts, Edmonds has made additional allegations relating to the September 11 terrorist attacks and to the allegedly inappropriate reaction by other FBI linguists to those attacks. Edmonds never raised those allegations to the OIG, and we have not investigated them in this review. Rather, we understand that staff from the National Commission on Terrorist Attacks Upon the United States have interviewed Edmonds regarding these claims. (U)

In addition, our investigation did not review allegations regarding unauthorized disclosure of information to the media. We did not address Edmonds' allegation, contained in a lawsuit she filed against the FBI, that her Privacy Act rights were violated by FBI disclosures about her, nor do we address the FBI's claim that Edmonds improperly disclosed classified information. (S)
Pursuant to instructions in the offer letter, Edmonds completed on June 4, 1998, an SF-86 Questionnaire for National Security Positions – the standard form used by the federal government to collect information for background investigations of persons applying for positions that require a security clearance. As part of the background investigation, Edmonds was polygraphed on December 4, 1998. The FBI also conducted a Personal Security Interview (PSI) of Edmonds on December 16, 1998. Her security file does not reflect any activity on her background investigation during 1999. It appears that through a series of oversights and lack of follow through, the FBI did not take action on her background investigation during this time period, and therefore Edmonds did not begin work as a contract linguist during this time period. (U)

In February 2000, the FBI asked Edmonds to submit another SF-86. In April 2001, the Language Services Section wrote a memorandum requesting that the PSI be updated, and asking that the necessary work be done to complete the background investigation. The FBI conducted supplemental PSIs of Edmonds on May 1, 2001, and July 19, 2001. On September 13, 2001, four years after she first submitted her application, the FBI granted Edmonds a "Top Secret" clearance. No job interview was conducted other than the PSIs.

² The various linguist positions in the FBI are described more fully in the next section of this report. In brief, a CM can provide summary translations of oral and written communications, and analysis of those translations, for internal dissemination. In addition to those services, CLs also can act as interpreters in FBI interviews, review material produced by other linguists, produce written communications for internal and court dissemination, and testify as expert witnesses in federal court. A CL can perform the same duties as a Language Specialist (LS), which is the term for a linguist who is a permanent employee of the FBI. (U)
C. The FBI’s Language Service Section, FBI Security Clearances

1. FBI Language Service Section Structure and Operations (U)

a. Organization (U)

In the early 1980s, the FBI began hiring linguists for translation, interpretation, and other language services necessary for the FBI’s work. Before that, the FBI used Special Agents to perform such services. The number of linguists hired by the FBI has grown from a mere handful in 1983 to over 1,100 by 2002. (U)

Through its Foreign Language Program (FLP), the FBI seeks to ensure that the language needs of its field offices and Headquarters units are met. The FLP and the personnel who perform language services for the FBI are directed by the Language Services Section (LSS). LSS personnel handle approximately 60 languages covering 95 percent of the world’s population.
Since March 2002, the LSS has been placed within the Office of International Operations at FBI Headquarters, which is under the jurisdiction of the FBI’s Director for Law Enforcement Services. Immediately before the March 2002 reorganization, LSS was part of the Investigative Services Division. A copy of the FBI’s current organizational chart is attached as Appendix A. (U)

During the early part of 2002, the time relevant to this review, LSS was composed of three units. The Language Training and Assessment Unit (LTAU) was responsible for developing and conducting language assessments of FBI applicants and personnel. The LTAU also provided foreign language and cultural training to FBI personnel. The Translation and Deployment Unit (TDU) managed national translation and interpreting resources in support of the FBI’s investigative and administrative priorities. The TDU ensured that linguists were assigned to field offices requesting their services or that a requesting office’s work was sent to available linguists. The Language Administration and Acquisition Unit (LAAU) handled the administrative functions of the FLP. The LAAU also was responsible for hiring linguists and for researching, acquiring, and integrating language-related technologies. An organizational chart for the Language Services Section, dated November 13, 2001, is attached as Appendix B. (U)

b. Types of Linguists (U)

The FBI uses three types of linguists. First, the FBI has permanent employees known as Language Specialists. Language Specialists (LS) provide translations of written or oral communications and analyze those translations. They also can act as interpreters in FBI interviews, review material produced by other linguists, produce written communications for internal and court dissemination, and testify as expert witnesses in federal court. (U)

In addition, the FBI uses contract employees as linguists. The Contract Linguist Program (CLP), which is administered by the LAAU, enables the FBI to acquire linguist resources without adding permanent employees. It also gives the FBI the opportunity to recruit permanent LS from linguists who already have been evaluated through the CLP. (U)

3 Before that, LSS had been placed, at various times, in the Laboratory Division and the Criminal Investigative Division. (U)
The FBI uses two types of contractors with different skill levels, CLs and CMs. Linguists' designation as CL or CM depends upon their performance on language tests administered by the LSS.4 (U)

According to the LSS Operational Manual, CLs perform translation duties "similar to those of Language Specialists." CLs provide translations of written or oral communications and analyze those translations. They also act as interpreters in FBI interviews, review material produced by other linguists, produce written communications for internal and court dissemination, and testify as expert witnesses in federal court. (U)

The FBI created the additional position of "Contract Language Monitor" (CM) in response to a critical need for linguists and the inability to find a sufficient number of linguists who qualify for LS or CL positions. A CM can provide summary translations of oral communications and analysis of those translations, and written communications for internal dissemination. (S)

4 In this report, the generic terms "linguist" or "translator" refer to any of the three categories - LS, CL, and CM. (U)
c. Linguist Responsibilities and Procedures (U)
In order to obtain a security clearance, FBI applicants must fill out an SF-86 form, *Questionnaire for National Security Positions*. The SF-86 is the standard form used by federal government agencies to collect information for background investigations and reinvestigations of persons applying for, or incumbents in, national security positions. The form consists of nine pages of questions addressing the following areas: identifying information, citizenship, residences, education, employment history, marital status/history, relatives and associates, military history, foreign travel and activities, a limited medical inquiry, police record, use of illegal drugs and drug activity, financial record, civil court actions, and associations with anti-American organizations.

b. Personal Security Interview (U)

In addition to filling out the SF-86 form, an individual whose background is being investigated by the FBI must undergo a Personnel Security Interview (PSI). According to the instructions on the SF-86, the interview is an...
“opportunity to update, clarify, and explain information on your form more completely.” According to the FBI’s Manual of Investigative Operations and Guidelines (MIOG), the interview must be conducted at the “inception of the [background] investigation with the purpose of obtaining information to facilitate our investigative efforts,” and “to ensure that complete (current and accurate) information is available concerning the candidate.” MIOG Part 2, Section 17-5.6 (U)

According to the MIOG and an FBI All Field Office Electronic Communication (EC) dated October 11, 2002, areas to be covered in the background investigation include personal and business credit issues, denials and dismissals from employment, business circumstances that could lead to conflict-of-interest allegations, membership or involvement in organizations that are discriminatory and organizations that advocate activities against the interest of the United States, and concealment of any activity that could be used to compromise the applicant or have an adverse affect on their character. MIOG Part 2 Section 17-5.6. (U)

c. Pre-employment Polygraph (U)

d. Risk Assessment (U)

The Language Services Section conducts the background investigation and the pre-employment polygraph to ensure that the candidate is suitable for employment. The applicant’s file is then passed to the Initial Clearance and Access Unit (ICAU) in the Personnel Security Section within the FBI’s Security
ICAU's function is to determine if the applicant will be granted a security clearance. (U)

The adjudicators within ICAU may request that a risk assessment be performed. A risk assessment is meant to address any security concerns that surface during the applicant's background investigation, including those that might indicate the applicant's vulnerability to coercion.

According to ICAU Unit Chief, the decision to conduct a risk assessment for an applicant depends on the specific circumstances of the case. He stated that as of March 2004, risk assessments are completed for approximately 95 percent of applicants for contract linguist positions.

e. Security Briefing and Forms (U)

If ICAU determines that a potential contractor should be granted a security clearance, a Security Officer gives that person a security briefing. The purpose of the briefing is to inform individuals that they may not disclose sensitive or classified information obtained while working for the FBI, and to inform the individuals of the consequences for unauthorized disclosure. (U)

At the briefing, new contractors sign a Security Acknowledgement Form in which they acknowledge that they understand the information provided in the briefing and agree to adhere to instructions printed on the form for handling classified information. They also sign a Classified Information

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13 Before the creation of the Security Division in December 2001, the duties were performed by the Industrial Security Unit within the National Security Division. (U)

15 Throughout this report, individuals are identified using the title they held at the time of the event or action under examination. (U)
Nondisclosure Agreement. The Agreement is an 11-point agreement between the individual and the United States government stating that the individual possesses a security clearance for access to classified information, has been briefed about security responsibilities, and will not improperly divulge classified information. The agreement also sets forth the potential punishments for improperly divulging classified information. Until the form is signed, the individual does not have clearance and cannot have access to national security information. (U)

Language Specialists who have been promoted to the position of Supervisory Language Specialist (SLS) serve as first-line supervisors. They assign work to translators, manage personnel issues, and identify training opportunities for their staff.

Approximately two months after Edmonds started work, supervisor retired.
The linguists are organized into groups according to their language specialty. Each group of linguists for a particular language is referred to as a "board." Each SLS supervises several boards.
The special agents who serve as Security Officers are responsible for processing administrative paperwork for FBI employees, contractors, and others who needed security clearances, country clearances, and travel warnings. They also pass clearances to other organizations. The Security Officer also provides security briefings and covers leads for background investigations.

Security Officers also conduct investigations of reported and suspected security violations. The types of violations they investigate include using home computers to process classified information, processing Top Secret information on the internal FBI Secret network, unauthorized access to FBI files, and sharing computer passwords.

In the next section, we describe each of Edmonds' allegations and the evidence to support or refute them.

A. Arrival of Edmonds

Edmonds began work at the FBI on September 20, 2001. At her request, she worked part-time for approximately 20 hours per week.
If a CM does a verbatim translation, a CL must review it, because the CM is not qualified. Even if a CM does a summary translation of a document, procedures include a review by another linguist.
4. Edmonds Documents Additional Complaints on a February 8 Memorandum Written on Her Home Computer (U)
24 In a March 7, 2002, fax she sent to the OIG, Edmonds included a copy of a version of her February 8, 2002 memorandum.
E. Follow-up by Edmonds' Supervisors (U)
On March 8, Edmonds took the polygraph examination. The polygraph questions related to whether she had disclosed classified information to unauthorized persons, and whether she was maintaining classified information outside FBI office space. She denied disclosing classified information to unauthorized persons, and denied maintaining classified information outside FBI space. The polygrapher concluded that she was not deceptive in her answers.
H. Additional Complaints by Edmonds (U)
1. FBI's Decision to Stop Using Edmonds' Services (U)
J. Events After Edmonds' Services Were Terminated (U)
Sometime in May 2002, after the media and Congress began making inquiries about Edmonds' allegations, these issues came to the attention of Edward Shubert, head of the Security Division at FBI Headquarters. Shubert asked one of his unit chiefs to take a look at this matter. The unit chief assigned an Investigative Analyst Consultant (IAC) with the Security Division to gather information about the case. (U)
The IAC's review also noted that the polygraphs were not as precise as they could have been. The IAC reported that the Polygraph Unit Chief admitted that questions directly on point could have been asked but were not. However, the Polygraph Unit Chief asserted to the IAC that the more generic question "would have elicited a discernible reaction." 

K. Additional Allegations by Edmonds (U)
OIG Conclusion (U)
Edmonds said that a Spanish language linguist was at an adjoining work station at the time of this conversation. The Spanish language linguist told the OIG that she could not recall this conversation, and she noted that all the linguists wear headphones while they work. (U)
J. Documents Allegedly Taken from Edmonds' Workspace (U)

Edmonds alleged that documents disappeared from the desk she shared with her colleague. Because Edmonds was a part-time contractor, she did not have an assigned desk and therefore kept her personal and work-related items in the desk of a colleague.

Edmonds alleged that some of the missing documents related to a project she was working on.

Several of Edmonds' colleagues confirmed that Edmonds spoke to them about missing documents while she was working at the FBI.

OIG Conclusion (U)

We did not find sufficient evidence to substantiate Edmonds' allegation. Although Edmonds reported her concern about missing documents to several co-workers and to her supervisor near the time she alleged it occurred.
OIG Conclusion (U)

VI. FBI'S INVESTIGATION OF EDMONDS' ALLEGATIONS (U)

We believe the FBI's handling of the allegations reflected an unwarranted reluctance to vigorously investigate the allegations or to conduct a rigorous examination.
D. FBI's Response to Edmonds' First Written Complaint - January 22, 2002, Memoranda (U)
Several FBI witnesses told the OIG that allegations suggesting potential espionage by one FBI employee against another are exceedingly rare. The allegation was extremely serious — even if the evidence was not clear.\footnote{As demonstrated by the espionage of former FBI Agent Robert Hanssen, the FBI must take seriously allegations suggesting security breaches even if the evidence is not clear-cut. The Hanssen case demonstrates that an individual reporting a security-related concern about another employee may not have the whole story, but may provide sufficient information to focus attention on a person deserving of further scrutiny. See the OIG’s report entitled “A Review of the FBI’s Performance in Deterring, Detecting, and Investigating the Espionage Activities of Robert Philip Hanssen,” August 2003, at 148-60.} 

At the time of these events, the FBI had no protocol for the receipt and investigation of derogatory information about an employee or contractor. In May 2002, in response to the Hanssen case, the FBI created a new
counterespionage section, CD-4, to investigate allegations of espionage within the intelligence community, including all allegations of penetrations of the U.S. Government. According to the Chief of CD-4, if Edmonds' allegations were made today, they might still be investigated by the Security Office. However, he said that at a minimum that Security Office should consult with CD-4 during the investigation.

E. FBI's Response to Edmonds' Subsequent Written Complaint, the February 8, 2002, Memorandum

The OIG also found problems with the manner in which the FBI handled Edmonds' February 8 memorandum. These problems had significant implications for the investigation the FBI conducted.
FBI's Security Investigation (U)

The Security Office quickly took custody of Edmonds' home computer on February 13 and analyzed it on February 14. The Security Office also deleted classified information from the computer and returned the computer to the Edmondsses.
Finally, we believe the FBI Security Division failed to treat Edmonds' allegations adequately.

Nevertheless, the Security Division failed to initiate a more thorough investigation. For all of the reasons already set forth in this report, we believe ample basis existed for such a review.
On April 2, the FBI sent a letter to Edmonds terminating her contract as of March 26. Edmonds has claimed that her termination was in retaliation for her raising allegations of misconduct to the FBI.

Edmonds does not qualify for "Whistleblower" status under the FBI Whistleblower regulations because she was a contractor, not an FBI employee. See 28 Code of Federal Regulations § 27.1(a). However, in examining the question of whether the FBI retaliated against Edmonds because of her allegations of misconduct, we used the principles of these regulations when analyzing whether a complainant can demonstrate improper retaliation.

Pursuant to these regulations, the FBI cannot take a personnel action against an employee in retaliation for any "protected disclosure" the employee has made. 28 C.F.R. Section 27.2. For a disclosure to be "protected" under the regulations, it must be made to the OIG, DOJ OPR, FBI OPR, the Attorney General, the Director of the FBI, the Deputy Director of the FBI, or the highest ranking official in any FBI field office. 28 C.F.R. 27.1(a) In addition, the employee making the disclosure must reasonably believe the disclosure evidences a violation of law, rule, or regulation; or mismanagement, a gross waste of funds, an abuse of authority, or a substantial and specific danger to public health or safety. 28 C.F.R. 27.1 (a). The complainant has the burden of showing by a preponderance of the evidence that her protected disclosure was a contributing factor in the decision to take the personnel action. Once that showing is made, the burden shifts to the agency to show by clear and convincing evidence that it would have taken the personnel action against the complainant in the absence of the protected disclosure. Id. at § 27.5(e)(2).

Edmonds' allegations would clearly qualify as protected disclosures under the FBI Whistleblower regulations. Thus, the key issue would be whether her disclosures were a "contributing factor" in the termination of her services. Under the Whistleblower regulations, the FBI would have to prove by clear and convincing evidence that it would have taken the same action absent her disclosures.
In sum, while Edmonds does not fall within the protection of the FBI’s Whistleblower regulations, we believe that the FBI significantly mishandled this matter. The FBI should not discourage employees or contractors from raising good-faith allegations of misconduct or mismanagement. By terminating Edmonds’ services, in large part because of her allegations of misconduct, the FBI’s actions also may have the effect of discouraging others from raising concerns.\textsuperscript{51} (U)

VIII. OTHER ALLEGATIONS MADE BY EDMONDS (U)

A. Work “Slow Down” (U)

\textsuperscript{51} In response to a draft of this report, the FBI expressed disagreement with this conclusion. A copy of the FBI’s response to the OIG is attached as Appendix D. (U)
None of the other linguists the OIG interviewed stated that they heard any linguist or supervisor instruct any linguist to slow down work or otherwise abuse the time and attendance rules of the FBI. (U)

OIG Conclusion (U)
The FBI administers language tests in two phases to CL and CM candidates. In “Phase I,” the FBI administers the Defense Language Proficiency Tests (DLPT) for Listening Comprehension and Reading Comprehension.

In order to pass the DLPT, CLs must obtain a score of at least 45 on both portions of the test. CMs must achieve a score of at least 45 on the listening comprehension portion.

Phase I also includes an English Composition test, which includes both multiple-choice questions and an essay, and is graded on a scale of 0-5. In order to pass the English Composition portion of Phase I, a CL must obtain a score of at least 2+ and a CM candidate must achieve a score of at least 2.

According to the FBI’s MAOP, only linguists who pass “Phase I” of the FBI’s language test battery will be scheduled for “Phase II.” See MAOP Part 1, Section 22-1.7. (U)

Phase II consists of Foreign Language Speaking and English Language Speaking tests. According to Margaret Gulotta, Chief of the FBI’s Language Services Section, Phase II is administered over the telephone by a “highly-educated native speaker.” It is also graded on a 0-5 scale. (U)

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54 Possible scores include “pluses,” but not minuses (i.e., 0, 1, 1+, 2, 2+, 3, 3+, 4, 4+, and 5). A score of 1+ is described as “Elementary Proficiency, Plus,” a score of 2 is described as “Limited Working Proficiency,” and a score of 3 is described as “General Professional Proficiency.” (U)
The Phase I English Composition, Phase II Foreign Language Speaking, and Phase II English Language Speaking tests are considered together in the qualification process. In order to qualify as a CL, a candidate must obtain a score of 3 or higher on any two of the three tests and may score as low as 2+ on the third test. A CM candidate may score as low as 2 on any one of the three tests but must score 2+ or higher on the other two tests. According to Gulotta, between June 2000 and July 2002, the FBI administered over 4,300 language tests.
According to Gulotta, however she did not have the authority to grant this waiver. Only the Unit Chief of LTAU may grant such a waiver. MAOP Part 1, Section 22-1.7(4). Gulotta also told the OIG in July 2002 that the FBI did not have any other CMs who had been hired based on waivers. She stated that she believed she had the authority to grant the waiver because in past emergency situations contractors had been allowed to work with no or incomplete testing, or had received waivers from a Program Manager. (U)
In September 2002, the request was broadened to include CMs. (U)
D. Additional Allegations (U)

Edmonds made other allegations that the OIG investigated and did not substantiate. We discuss those briefly below. (U)

1. Other Travel-Related Allegations (U)
In sum, we found the allegations regarding travel for concerts, shopping, or family visits were unsubstantiated. (U)

2. Improper Receipt of Gifts by Supervisors (U)

The OIG was unable to determine the specific value of the watches, but they do not appear to be expensive watches. We found that the same brand of watches was advertised on the Internet for $4.90 per set. In addition, a jeweler told the OIG that the watches do not contain a karat mark, indicating that they do not contain any gold. The jeweler said that he had seen similar watches for sale by street vendors in Washington, D.C. He estimated that the watches could be worth anywhere from $20 to $100. (U)
The FBI MAOP provides that a supervisor may not accept a gift from a subordinate employee who receives less pay than the supervisor. A supervisor may accept from subordinates voluntary gifts of a nominal value made on a special occasion such as marriage, illness, or retirement. A supervisor may also accept gifts worth less than $10 on “on an occasional basis, including any occasion on which gifts are traditionally given or exchanged” such as holidays. MAOP 1-13.1. This provision of the MAOP is the same as the DOJ regulation prohibiting gifts from subordinates to supervisors. 5 CFR 2635.302 & 304.

The OIG also received an allegation from the FBI of a possible unauthorized disclosure of classified information to a congressional staffer. The OIG found that on June 17, 2002, Edward Shubert, the Section Chief of the Personnel Security Section in the Security Division, conducted a briefing regarding Edmonds’ allegations for congressional staff members. Because one of the congressional staff members present lacked the appropriate security
IX. OIG RECOMMENDATIONS (U)

In light of the issues that we examined in this case, we are providing eight systemic recommendations to the FBI in an attempt to help it improve its foreign language translation program. (U)

1. The FBI should consider having an employee from the Language Services Section or a case agent from the relevant squad interview contract linguists before they are hired by the FBI. The FBI’s hiring process for contract linguists includes both language testing and a full background investigation. Although the background investigation includes a Personal Security Interview designed to obtain information relevant to the security clearance, contract linguists are not interviewed before being hired by employees from the Language Services Section or any operational agents. As a result, the supervisors of contract linguists or contract monitors never have an opportunity to meet with the linguist and explore any issues relating to their qualifications, background, or foreign contacts prior to the linguists starting work. While we recognize that these linguists are used on a contract basis only, we believe the FBI should consider including an interview during the hiring process for contract linguists and contract monitors. Such an interview could include the applicant’s future supervisor or a case agent from a relevant operational squad. (U)

57 This briefing recently has become the subject of congressional complaints regarding retroactive classification of information by the DOJ. (U)
5. The FBI should establish a uniform policy with regard to work assignment sheets for linguists. In the Language Services Section, work assignment sheets that should contain the signatures of the translator, reviewer, and editor who worked on a particular translation are destroyed after the information is entered into a database. We also were told that the practice with respect to the signatures on these forms is not uniform. For example, some individuals only put a checkmark by their name when they complete the assignment, while others simply forward the sheet without marking it in any way. We recommend that the FBI establish and enforce a uniform policy requiring signatures on work assignment sheets, and that it maintain those sheets for a reasonable period of time so that issues relating to a particular translation can be addressed adequately. (U)
8. The FBI should reinforce ethics rules regarding gifts to supervisors. We found that the practice of giving small gifts to language squad supervisors was widespread, and was not limited to special occasions such as marriage, illness or retirement. We believe the FBI should reiterate the ethics rules regarding gifts and specifically instruct language squad supervisors and linguists to stop the practice of supervisors accepting gifts from linguists. (U)

X. CONCLUSION (U)
Edmonds also alleged that the FBI retaliated against her by terminating her services as a contract linguist. We concluded that Edmonds' allegations were at least a contributing factor in why the FBI terminated her services. We recognize that the FBI Whistleblower regulations do not apply to Edmonds because she was a contractor rather than an FBI employee. We also recognize that her varied and insistent allegations of misconduct may have been frustrating and that not all of her allegations were true. However, many of her allegations had a basis in fact, and the way the FBI responded to her allegations contributed to her persistent claims. Moreover, we believe the FBI should not discourage employees or contractors from raising good faith allegations of misconduct or mismanagement and the FBI's termination of Edmonds' services may discourage others from raising such concerns.

With regard to Edmonds' other allegations of misconduct, most were not supported by the evidence we reviewed. However, she did raise a valid concern about unnecessary travel for certain linguists.

Finally, our review also found problems in the oversight of FBI contract linguists. The FBI needs to more carefully oversee and monitor their work. Towards this end, we made several recommendations regarding the FBI's hiring and oversight of contract linguists. We believe that the FBI should carefully consider these recommendations, which we believe could help improve the operation of the FBI's language translation program.
APPENDICES
For Internal FBI Foreign Language Personnel Usage Only - No Outside Dissemination Permitted
Honorable Glenn A. Fine  
Inspector General  
Department of Justice  
Room 4322 Main  
950 Pennsylvania Avenue, Northwest  
Washington, D.C. 20530

Dear Mr. Fine:

This letter is in response to your draft report on Sibel Edmonds. First, I disagree with your conclusion that Edmonds, a private contractor, was retaliated against for her making allegations of misconduct or mismanagement. Edmonds was terminated from the FBI because she committed security violations and was a disruption to her office. Second, the FBI thoroughly investigated this matter and determined that retaliation was not the basis of her termination. Your report makes reference to her "increasingly vociferous complaints," and found "insufficient evidence" to substantiate multiple additional allegations made by Edmonds. Under the totality of the facts and circumstances, the FBI was justified to terminate her contract and did not retaliate against her.

The Director has testified before Congress, and has communicated to all employees in the FBI, that he will not tolerate retaliation.

Please feel free to contact me at (202) 324-2901 should you require additional information.

Sincerely yours,

Steven C. McCraw  
Assistant Director  
Inspection Division