Audit Report

OIG-11-086

SAFETY AND SOUNDNESS: Material Loss Review of La Jolla Bank, FSB

July 14, 2011

Office of Inspector General

Department of the Treasury

Contents

Abbreviations

C&D order	cease and desist order
CCO	chief credit officer
CEO	chief executive officer
FDIC	Federal Deposit Insurance Corporation
IAR	internal asset review
MRBA	matter requiring board attention
OIG	Office of Inspector General
OTS	Office of Thrift Supervision
PCA	prompt corrective action
ROE	report of examination

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July 14, 2011

John E. Bowman, Acting Director
Office of Thrift Supervision

This report presents the results of our material loss review of the failure of La Jolla Bank, FSB (La Jolla Bank), of La Jolla, California, and of the Office of Thrift Supervision's (OTS) supervision of the institution. OTS closed La Jolla Bank and appointed the Federal Deposit Insurance Corporation (FDIC) as receiver on February 19, 2010. This review was mandated by section 38(k) of the Federal Deposit Insurance Act[1] because of the magnitude of La Jolla Bank's estimated loss to the Deposit Insurance Fund. As of May 31, 2011, FDIC estimated that the loss would be $1.035 billion. FDIC also estimated that La Jolla Bank's failure resulted in a loss of $6 million to its Transaction Account Guarantee Program.[2]

Our objectives were to determine the cause of La Jolla Bank's failure; assess OTS's supervision of La Jolla Bank, including implementation of the prompt corrective action (PCA) provisions of section 38; and make recommendations for preventing such a loss in the future. To accomplish these objectives, we reviewed the supervisory files and interviewed officials at OTS and FDIC. We conducted our fieldwork from April 2010 through July 2010. Appendix 1 contains a more detailed description of our review objectives, scope, and methodology. Appendix 2 contains background information on La Jolla Bank's history and OTS's assessment fees and examination hours.

[1] At the time of La Jolla Bank's failure, section 38(k) defined a loss as material if it exceeded the greater of $25 million or 2 percent of the institution's total assets. Effective July 21, 2010, section 38(k) defines a loss as material if it exceeds $200 million for calendar years 2010 and 2011, $150 million for calendar years 2012 and 2013, and $50 million for calendar years 2014 and thereafter (with a provision that the threshold can be raised temporarily to $75 million if certain conditions are met).
[2] Definitions of certain terms, which are underlined where first used in this report, are available in a separate document, OIG-11-065, on the Treasury Office of Inspector General's (OIG) website.

In brief, La Jolla Bank failed because of significant asset quality deterioration and loan losses. This condition resulted from La Jolla Bank's aggressive growth in high-risk construction, land, and commercial loans during the period 2002 to 2008, without attention to internal controls and changes in the marketplace. Potential fraud and other misconduct by the chief executive officer (CEO) and chief credit officer (CCO), brought to the attention of the board's audit committee by the thrift's internal auditor in July 2009, likely contributed to La Jolla Bank adopting its unsafe and unsound operating strategy. At the time of our review, OTS and FDIC were investigating potentially fraudulent activity and improper behavior by the thrift's officers. We have also referred these matters and related documentation to the Treasury Inspector General's Office of Investigations.

With respect to OTS's supervision, we found that OTS conducted timely and regular examinations of La Jolla Bank from 2004 through 2008. These examinations identified a number of issues with the thrift's lending and internal controls. Based on these examinations, OTS issued matters requiring board attention (MRBA) and recommended that the thrift take corrective action to resolve the identified weaknesses. These efforts were unsuccessful in resolving La Jolla Bank's problems. Finally, in 2009 OTS took formal enforcement action against the thrift; by then however, it was too late.

In accordance with its policy, OTS conducted a failed bank review of La Jolla Bank and similarly concluded that La Jolla Bank's failure resulted from its aggressive growth in high-risk construction, land, and commercial loans. The review also found that the CEO and CCO contributed to the unsafe and unsound conditions.

Pursuant to P.L. 111-203, the functions of OTS will transfer to other federal banking agencies on July 21, 2011. Accordingly we are not making any recommendations to OTS as a result of this material loss review. In previously issued material loss reviews of OTS-regulated failed thrifts, we made recommendations to OTS to address similar matters that were noted with respect to the causes of La Jolla Bank's failure and the supervision of the thrift.

In a written response, OTS stated that our report summarizes the primary causes of La Jolla Bank's failure, which are consistent with information in OTS's reports of examination (ROE) and documents in support of the grounds for receivership. OTS's response is included as appendix 3.

Causes of La Jolla Bank's Failure

La Jolla Bank failed because of significant asset quality deterioration and loan losses, following a period of aggressive growth in high-risk construction, land, and commercial loans. As the thrift grew rapidly from 2002 to 2009, management failed to maintain proper internal controls and the board did not appropriately oversee the thrift's lending activities. La Jolla Bank attempted to resolve problem loans by making improper loan modifications and extensions, which made loans with late payments appear current.[3] The thrift eventually became critically undercapitalized, was unable to raise capital, and failed.

La Jolla Bank Pursued Aggressive Growth in High Risk Loans Without Adequate Internal Controls

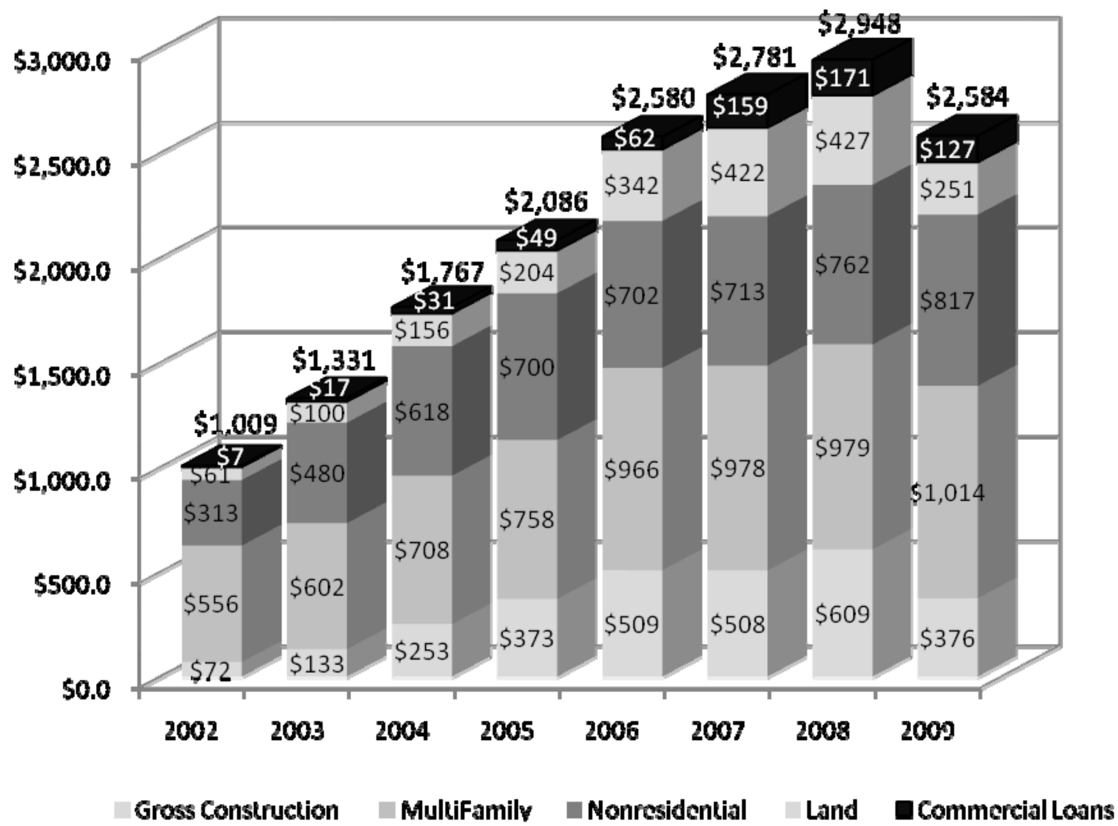
In 2002, La Jolla Bank changed its business strategy from primarily originating multifamily mortgage loans to aggressively growing a portfolio of high-risk construction, land, and commercial loans. Figure 1 on the following page shows the growth in La Jolla Bank's portfolio.

La Jolla Bank's management did not ensure that the thrift's credit administration was adequate. For example, La Jolla Bank used a business model which assigned individuals to overlapping roles and did not ensure adequate segregation of duties in key credit administration and underwriting functions. La Jolla Bank also allowed the CCO to oversee loan origination, underwriting, production, funding, and servicing functions, while simultaneously overseeing credit administration. From an internal control

[3] A loan modification is made by a lender in response to a borrower's long-term inability to repay the loan. Loan modifications typically involve a reduction in the interest rate on the loan, an extension of a loan's term, a different type of loan, or any combination of the these responses.

standpoint, one person performing all these duties does not provide for an adequate level of checks and balances.

Figure 1: La Jolla Bank's Loan Growth (in millions)



Source: La Jolla Bank's Thrift Financial Reports.

Other weaknesses in the thrift's operation included the following:

- La Jolla Bank allowed certain individuals significant influence over the thrift's loan portfolio by requiring only one loan committee member to approve new loans (up to $10 million), modifications, and extensions.

- OTS examiners found that La Jolla Bank's internal audit department had weaknesses. For example, in 2004 the thrift had just one full-time auditor. As a result, a number of high-risk areas were not audited in a timely manner. OTS's review of the 2004 audit plan revealed that, although high-risk, the lending area had not been audited for 2 years and the interest rate risk/asset liability management area had not been audited for 3 years. Several years later in 2008, OTS found that the internal audit department still needed to be strengthened to identify and correct risk management weaknesses in the thrift.

- OTS found La Jolla Bank's internal asset review (IAR) function was inadequate from 2004 until the thrift's closing. The IAR did not include reviews of construction and land loans or the thrift's underwriting practices.

- From 2004 through 2008, OTS found that the thrift's policies were not adequate. For example, in 2005, the thrift did not have comprehensive lending policies for all areas of lending and lacked clear and measurable underwriting standards.

La Jolla Bank Failed When It Could Not Raise Capital

As its loans deteriorated, thrift management attempted to resolve problem loans with questionable loan modifications and extensions, a strategy that proved to be both unsound and unsuccessful.[4] La Jolla Bank would often either arrange for different borrowers to assume or buy the loans, or grant modifications and extensions, often unsecured and without sufficient underwriting. This strategy only postponed inevitable loan defaults.

When La Jolla Bank's capital became insufficient to support the thrift's risk profile, La Jolla Bank could not raise the capital it needed. At OTS's direction, La Jolla Bank's board attempted to raise capital in 2009 by finding new investors and by converting debt to equity. The board also attempted to engage a large investment banker to assist. These efforts failed. On February 18, 2010, OTS concluded that it was highly unlikely that La Jolla Bank would become sufficiently capitalized. The thrift was closed on February 19, 2010.

[4] A problem loan is a commercial loan that is at least 90 days past due.

OTS's Supervision of La Jolla Bank

OTS conducted timely and regular examinations of La Jolla Bank and provided oversight through its offsite monitoring. In 2004 and subsequent examinations, OTS identified concerns with La Jolla Bank's business plan, loan policies, and internal controls. OTS generally addressed its concerns through MRBAs and corrective actions. Field visits, however, were not performed in between these examinations to ensure the thrift was taking the necessary corrective actions. Also, it was not until the December 2008 examination that examiners determined management practices and board oversight were inadequate, particularly in the key areas of loan underwriting and credit administration.

In April 2009, OTS issued a supervisory directive and a troubled condition letter to La Jolla Bank. In September 2009, OTS issued a cease and desist (C&D) order to the thrift. OTS also issued a PCA Directive on February 16, 2010. These actions were too late to save the thrift. On February 19, 2010, OTS closed La Jolla Bank and appointed the FDIC as receiver.

Table 1 summarizes the results of OTS's safety and soundness and limited examinations of La Jolla Bank from May 2004 until its closure in February 2010.[5]

Table 1. Summary of OTS's Examinations of and Enforcement Actions Against La Jolla Bank

		Examination Results			
Examination start date and type	**Total assets (in $ billions)**	**CAMELS rating**	**No. of MRBAs**	**No. of recommendations/ corrective actions**	**Enforcement actions**
5/03/2004 (full-scope)	$1.6	2/222122	7	13	None
7/25/2005 (full-scope)	$2.2	2/232122	1	5	Debt notification letter 10/18/2005
7/31/2006 (full-scope)	$2.8	2/222122	4	13	None
9/10/2007 (full-scope)	$3.3	2/222122	2	7	None

[5] OTS conducted its examinations and performed offsite monitoring of La Jolla in accordance with the timeframes prescribed in the OTS Examination Handbook.

Table 1. Summary of OTS's Examinations of and Enforcement Actions Against La Jolla Bank					
		Examination Results			
Examination start date and type	Total assets (in $ billions)	CAMELS rating	No. of MRBAs	No. of recommendations/ corrective actions	Enforcement actions
12/29/2008 (full-scope)	$3.8	4/444332	14	24	Supervisory directives 4/24/2009, 11/17/2009, 12/08/2009, and 12/22/2009 Troubled condition letter 4/29/2009 C&D 9/09/2009 Authorization of formal examination 12/29/2010
3/31/2009 (limited to record interim CAMELS downgrade)	$3.8	3/343222	N/A	N/A	
1/4/2010 (limited)	$3.8	N/A	N/A	1	PCA notice – undercapitalized 1/22/2010
1/27/2010 (limited)	$3.8	5/555522	N/A	0	PCA notice – critically undercapitalized 2/3/2010 Supervisory directive 2/04/2010 PCA directive 2/16/2010

OTS Did Not Take Timely Action to Address Weaknesses in La Jolla Bank's Risk Management and Credit Administration Practices

OTS examinations of La Jolla Bank conducted from 2004 through 2007 identified weaknesses in risk management and credit administration practices. Among other things, OTS reported in the ROEs concerns with the thrift's business plan, loan policies, internal controls, loan underwriting, and loan modification practices. With respect to La Jolla Bank's IAR function, OTS examiners reported that the function had not kept pace with the growth of increasingly larger and more complex loans. In this regard, the examiners found that the IAR function failed to adequately analyze and document the status of loans, did not conduct frequent enough inspections, did not downgrade assets in a timely manner, and at times, upgraded other assets too soon. The examiners unsuccessfully attempted to get management and the board to correct its problems through MRBAs and corrective action recommendations. Despite the repeated findings with the IAR function, OTS did not take enforcement action during the period to ensure that these weaknesses were corrected. During this period, OTS rated the bank a CAMELS composite 2.

It was not until the December 2008 examination that OTS reported La Jolla Bank's management's performance and board oversight were inadequate. During this examination, OTS determined that management's strategy to increase earnings by reducing overhead costs resulted in a lack of oversight in key areas, particularly loan underwriting and credit administration. OTS downgraded the thrift's composite CAMELS rating to a 4.

In the 2008 ROE, OTS directed La Jolla Bank, again through an MRBA instead of an enforcement action, to cease all construction, land, and unsecured commercial lending, and to cease all refinances, renewals, or modifications of construction, land, and unsecured commercial loans without OTS approval. OTS also directed La Jolla Bank to enhance loan modification policy and practices to document that foreclosure versus modification decisions were well-supported and prudent, and that loan modification decisions were appropriate.

In March 2009, while OTS's 2008 examination was still ongoing, OTS rated the thrift a CAMELS composite 3. In April 2009, OTS followed with numerous supervisory directives, a troubled condition letter, and a C&D order in September 2009. This strong action was too late to save the thrift.

We asked OTS's examiners and regional officials why stronger enforcement action was not taken sooner. OTS officials told us that they relied on thrift management to correct the problems. In this regard, for years management promised to hire a qualified IAR manager but it did not do so until 2009. The OTS field manager stated that the thrift could not manage its quick growth and was always lagging in taking corrective actions. Finally, he and the Assistant Director concluded that the thrift's problems warranted an enforcement action in 2009 when it was clear the thrift remained troubled. Overreliance by examiners on unfulfilled thrift management promises has been a problem noted in other material loss reviews by our office of OTS-regulated failed thrifts. In the case of La Jolla, we believe enforcement action was warranted before 2009, when it may have made a difference.

OTS's Use of PCA

The purpose of PCA is to resolve problems of insured depository institutions with the least possible long-term loss to the Deposit Insurance Fund. PCA requires federal banking agencies to take certain actions when an institution's capital drops to certain levels. PCA also gives regulators flexibility to supervise institutions based on criteria other than capital levels to help reduce deposit insurance losses caused by unsafe and unsound practices.

Although we determined that OTS should have acted more forcefully and sooner to address the unsafe and unsound practices with La Jolla Bank, we found that OTS imposed PCA timely as La Jolla Bank's capital levels deteriorated.

OTS took the following key actions related to La Jolla Bank in accordance with PCA requirements:

- During a January 4, 2010, limited examination, OTS determined that La Jolla Bank was undercapitalized. On January 22, 2010, OTS issued a notice to the thrift's board that the thrift was undercapitalized and had to file a capital restoration plan no later than February 5, 2010. OTS's notice also informed La Jolla Bank that it was subject to the PCA restrictions applicable to undercapitalized institutions.

- On February 3, 2010, OTS notified La Jolla Bank that the thrift was critically undercapitalized and was subject to additional PCA restrictions. These included restricting compensation paid to senior executive officers and payments on subordinated debt.

- La Jolla Bank submitted a capital restoration plan on February 5, 2010, but OTS considered it unacceptable. OTS concluded the plan was not based on realistic assumptions and was unlikely to succeed in restoring La Jolla Bank's capital. OTS informed La Jolla Bank that it found the plan unacceptable when it issued the thrift a PCA directive on February 16, 2010.

OTS closed La Jolla Bank on February 19, 2010, and appointed the FDIC as receiver.

OTS Internal Failed Bank Review

In accordance with its policy, OTS completed an internal failed bank review of La Jolla Bank and concluded, similar to our MLR that La Jolla Bank's failure was caused by aggressive growth and a high level of higher risk construction and land loans. These loans deteriorated in the economic downturn and caused unsustainable losses that eroded the thrift's capital. The review also concluded that losses suffered by the Deposit Insurance Fund were partially attributable to the actions of the former CEO and former CCO, who were less than forthcoming during OTS examinations, extended unsecured lines to keep other loans current, granted loans and extensions with stale appraisals, and modified existing credits to avoid the classification and recognition of losses. The review found that OTS did not ensure these weaknesses were corrected and that OTS should have performed field visits in between annual examinations to verify the extent of corrective actions implemented by management and, if necessary, mandated stronger supervisory action to ensure compliance. The review recommended that OTS document repeat violations in ROEs and require a written response from the board, so the OTS regional office can monitor the status of prior corrective actions until all matters have been fully completed.

OTS internal failed bank review also noted a lack of field visits by examiners between examinations.

* * * * * *

We appreciate the cooperation and courtesies extended to our staff during the audit. If you wish to discuss the report, you may contact me at (617) 223-8640 or Sharon Torosian, Audit Manager, at (617) 223-8642. Major contributors to this report are listed in appendix 4.

/s/
Donald P. Benson
Audit Director

We conducted this material loss review of La Jolla Bank, FSB (La Jolla Bank), of La Jolla, California, in response to our mandate under section 38(k) of the Federal Deposit Insurance Act.[6] This section provides that if the Deposit Insurance Fund incurs a material loss with respect to an insured depository institution, the inspector general for the appropriate federal banking agency is to prepare a report to the agency that

- ascertains why the institution's problems resulted in a material loss to the insurance fund;
- reviews the agency's supervision of the institution, including its implementation of the prompt corrective action provisions of section 38; and
- makes recommendations for preventing any such loss in the future.

At the time of La Jolla Bank's failure, on February 19, 2009, section 38(k) defined a loss as material if it exceeds the greater of $25 million or 2 percent of the institution's total assets. We initiated a material loss review of La Jolla Bank based on the loss estimate by the Federal Deposit Insurance Corporation (FDIC). As of May 31, 2011, FDIC estimated that the loss to the Deposit Insurance Fund from La Jolla Bank's failure would be $1.035 billion.[7]

Our objectives were to determine the causes of La Jolla Bank's failure; assess the Office of Thrift Supervision's (OTS) supervision of the thrift, including implementation of the PCA provisions of section 38; and make recommendations for preventing such a loss in the future. To accomplish our review, we conducted fieldwork at OTS's Western Region field office in Daly City, California. We also performed work and interviewed officials at FDIC's Division of Resolutions and Receiverships in Irvine, California. We conducted our fieldwork from April 2010 through July 2010.

To assess the adequacy of OTS's supervision of La Jolla Bank, we performed the following work:

[6] 12 U.S.C.§1831o(k).
[7] At closing, the loss estimate to the Deposit Insurance Fund was $882.3 million.

- We reviewed OTS's supervisory files and records for La Jolla Bank from 2004 through February 2010. We analyzed reports of examination, supporting workpapers, and related supervisory and enforcement correspondence. We performed these analyses to gain an understanding of the problems identified, the approach and methodology OTS used to assess the thrift's condition, and the regulatory action OTS used to compel thrift management to address deficient conditions.

- We interviewed and discussed various aspects of the supervision of La Jolla Bank with OTS officials and examiners to obtain their perspectives on the thrift's condition and the scope of the examinations.

- We interviewed FDIC officials who were responsible for monitoring La Jolla Bank for federal deposit insurance purposes.

- We interviewed personnel from FDIC's Division of Resolutions and Receiverships involved in the receivership process, which was conducted after La Jolla Bank's closure and appointment of FDIC as receiver.

- We assessed OTS's actions based on its internal guidance and requirements of the Federal Deposit Insurance Act.(12 U.S.C. § 1811 et seq.)

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

History of La Jolla Bank

La Jolla Bank, FSB (La Jolla Bank), began operations under the name of La Jolla Village Savings Bank in 1985, in La Jolla, California. In 1992, the thrift changed its organization type to a stock savings bank and name to La Jolla Bank, FSB. La Jolla Bank was a wholly owned subsidiary of La Jolla Bancorp, Inc (Bancorp), a non-diversified, unitary thrift holding company. Bancorp was 100 percent owned by five Warren family trusts that were formed solely to own stock in Bancorp. The Frank R. and Joanne C. Warren La Jolla Stock Revocable Trust owned 80 percent and four trusts established for the Warren's four children each owned a five percent interest. Bancorp issued a total of $65 million of trust preferred securities in 2003, 2004, and 2005 and was dependent upon dividends from La Jolla Bank to make payments on the debt. La Jolla Bank reported total assets of $3.6 billion as of December 31, 2009.

La Jolla Bank had 124 employees and nine branches in Southern California and one branch in Dallas, Texas. La Jolla Bank was a portfolio lender that historically originated multifamily and non-residential mortgage loans, which totaled one half of the thrift's total assets by December 31, 2009. In 2005, La Jolla Bank began experiencing significant growth in higher-risk assets including land, commercial real estate, and speculative construction loans. By December 31, 2009, these loan types amounted to 40 percent of La Jolla Bank's loan portfolio.

Office of Thrift Supervision Assessments Paid by La Jolla Bank

Office of Thrift Supervision (OTS) funds its operations in part through semiannual assessments on thrifts. OTS determines each institution's assessment by adding together three components reflecting the size, condition, and complexity of an institution. OTS computes the size component by multiplying an institution's total assets, as reported on its thrift financial report, by the applicable assessment rate. The condition component is a percentage of the size component and is imposed on institutions that have a 3, 4, or 5 CAMELS composite rating. OTS imposes a complexity component if (1) a thrift administers more than $1 billion in trust assets; (2) the outstanding balance of assets fully or partially covered by recourse obligations or direct credit substitutes exceeds $1 billion, or (3) the thrift services over $1 billion of loans for others. OTS calculates the complexity component by multiplying set rates by the amounts by which an association exceeds each threshold. Table 2 shows the assessments that La Jolla Bank paid to OTS from 2004 through 2010.

Table 2: Assessments Paid by La Jolla Bank to OTS, 2004–2010

Billing Period	Exam Rating	Amount Paid
1/1/2004 - 6/30/2004	2	$131,280
7/1/2004 - 12/31/2004	2	146,685
1/1/2005 - 6/30/2005	2	168,861
7/1/2005 - 12/31/2005	2	186,364
1/1/2006 - 6/30/2006	2	212,069
7/1/2006 - 12/31/2006	2	228,986
1/1/2007 - 6/30/2007	2	257,702
7/1/2007 - 12/31/2007	2	282,325
1/1/2008 - 6/30/2008	2	307,141
7/1/2008 - 12/31/2008	2	317,559
1/1/2009 - 6/30/2009	2	335,239
7/1/2009 - 12/31/2009	3	515,129
1/1/2010 - 6/30/2010	4	696,216

Source: OTS.

Number of OTS Staff Hours Spent Examining La Jolla Bank

Table 3 on the next page shows the number of OTS staff hours spent examining La Jolla Bank from 2004 to 2010.

Table 3: Number of OTS Hours Spent Examining La Jolla Bank, 2004-2010

Examination Start Date	Exam Type	Number of Examination Hours
5/3/2004	Full	853
7/25/2005	Full	1,127
7/31/2006	Full	1,288
9/10/2007	Full	1,475
12/29/2008	Full	2,737
1/4/2010	Limited	751

Source: OTS Electronic Continuing Examination Folder system

Office of Thrift Supervision
Department of the Treasury

Thomas A. Barnes
Deputy Director, Examinations, Supervision, and Consumer Protection

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July 12, 2011

MEMORANDUM FOR: Donald Benson
Audit Director
Office of Inspector General
U.S. Department of the Treasury

FROM: Thomas A. Barnes /s/
Deputy Director

SUBJECT: Draft Material Loss Review of
La Jolla Bank, FSB
Rancho Santa Fe, CA

Thank you for the opportunity to comment on your draft memorandum entitled "Material Loss Review of La Jolla Bank, FSB, Rancho Santa Fe, CA," (the Bank).

The memorandum summarizes the primary causes of the Bank's failure, which are consistent with the information contained in the OTS Reports of Examination and documents in support of the grounds for receivership. Specifically, the memorandum indicates, La Jolla Bank failed because of significant asset quality deterioration and loan losses. This condition resulted from the Bank's aggressive growth in high-risk construction, land, and commercial loans without attention to internal controls and changes in the marketplace. Potential fraud and other misconduct by the chief executive officer and chief credit officer, brought to the attention of the board's audit committee in July 2009 by the thrift's internal auditor, likely contributed to the Bank adopting its unsafe and unsound operating strategy. The memorandum does not include recommendations to the OTS as a result of this material loss review.

Thank you again for the opportunity to review and respond to the draft memorandum addressing La Jolla Bank, FSB. OTS appreciates the professionalism and courtesies provided by the staff of the Office of Inspector General.

Boston Audit Office

Sharon Torosian, Audit Manager
Jeanne DeGagne, Auditor-In-Charge
Alex Taubinger, Auditor
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Shaneasha Edwards, Referencer

<u>Department of the Treasury</u>

Deputy Secretary of the Treasury
Office of Strategic Planning and Performance Management
Office of Accounting and Internal Control

<u>Office of Thrift Supervision</u>

Acting Director
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OIG Budget Examiner

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Chairman and Ranking Member
Committee on Banking, Housing, and Urban Affairs

Chairman and Ranking Member
Committee on Finance

<u>U.S. House of Representatives</u>

Chairman and Ranking Member
Committee on Financial Services

<u>Federal Deposit Insurance Corporation</u>

Acting Chairman
Inspector General

<u>U.S. Government Accountability Office</u>

Comptroller General of the United States