OUR MISSION

The mission of the Philadelphia Office of the Inspector General is to boost public confidence in city government by rooting out corruption, fraud, misconduct, waste and mismanagement.

A watchdog for city taxpayers, the OIG has authority under the Philadelphia Home Rule Charter to conduct investigations and audits of all departments, agencies, commissions and boards under the Mayor’s jurisdiction.

The office also investigates individuals or companies doing business with the city or receiving city funding. Its investigative expertise is available to any city agency that requests it.

As an operationally independent office, shielded from governmental influence, the OIG conducts both criminal and administrative investigations. It has the power to issue subpoenas, to examine all city documents, contracts and monetary expenditures made from the city treasury, and to demand testimony from city employees.

The office works with federal, state and local law enforcement when conducting criminal investigations and serious integrity-related complaints of fraud, abuse and corruption.

The office conducts these investigations either in response to a complaint, or on the Inspector General’s own initiative to detect misconduct, inefficiency and waste within the programs and operations of city government.
TABLE OF CONTENTS

Message from the Mayor 1

Message from the Inspector General 2

The Year in Numbers 3-4

Toward a More Ethical Government 5

Power in Numbers 6

Rooting Out Fraud and Corruption 7-10

Leveling the Playing Field 11-12

Protecting Taxpayer Money 13

Strengthening Policies 14

Changing the Culture 15-16

Note: This report was produced in accordance with Executive Order No. 4-94, which clarifies the role of the OIG. The order states that the “OIG shall provide continuous dialogue with the Mayor and department heads regarding significant problems or deficiencies within City operations and programs and provide recommendations to resolve those issues.” Furthermore, it is “the OIG’s mission to enhance the public confidence … and provide leadership and guidance in recommending programs and/or policies which educate and raise the awareness of all City officials/employees to integrity and ethics-related issues....”
MESSAGE FROM THE MAYOR

When I ran for Mayor in 2007, I was deeply concerned by the cronyism and pay-to-play politics that were making Philadelphians lose faith in their government. I promised, if elected, to clear the way for dedicated civil servants to restore integrity and dignity to our city. Inspector General Amy Kurland has helped me make good on that pledge.

During my first term in office, the City fired or accepted the resignation of 122 employees based on investigations conducted by Kurland’s office. Airtight in every case, the OIG’s evidence has also laid the foundation for criminal charges brought against 39 individuals since 2008.

And in tough budget times, the OIG has also helped shore up the City’s bottom line. The City has saved or recovered $25.7 million since 2008 thanks to the OIG. Those numbers are impressive, especially when you compare them to the office’s $1.3 million annual budget.

But numbers alone don’t tell the story. Beyond uncovering fraud and corruption, the IG’s team is preventing it. They’re making wayward employees think twice about selling city property for cash or accepting lavish meals from contractors, and they’re making some contractors pause before they decide to break the law.

The OIG team’s proactive approach has many guises: they make things happen by collaborating with other agencies. With the Law Department and the Board of Pensions and Retirement, the OIG is removing former employees convicted of certain crimes from the City pension rolls. With the Office of Economic Opportunity, the OIG is going after sham minority contractors and standing up for legitimate yet disadvantaged businesses. And with the Managing Director’s Office, the OIG has helped the City’s PhillyRising initiative raise the quality of life in economically distressed neighborhoods like Frankford and Strawberry Mansion.

I am proud of all that the OIG has achieved under Inspector General Amy Kurland’s watch. Indeed, the Office of the Inspector General has exceeded my expectations. And with each passing day, Philadelphians are regaining pride and faith in their City government for its honesty, transparency, efficiency and ability to serve its customers, the citizens of Philadelphia.

Sincerely,

Michael A. Nutter
MESSAGE FROM THE INSPECTOR GENERAL

In my four years as Inspector General, I’ve often said that most city employees are honest and hard-working. Still, I was a bit surprised by what happened last spring.

In March 2011, Daniel Apokorin allegedly dropped an envelope filled with $5,000 cash on a Philadelphia Commerce Department official’s desk. The official immediately reported the incident to the department’s integrity officer, who then called the OIG.

I wasn’t surprised that the Commerce official reported the incident. I was surprised that someone would risk discounting the official’s integrity.

My office teamed up with the FBI and learned that Apokorin was interested in quickly acquiring a property from the city. In April 2011, Apokorin allegedly handed another $5,000 to a federal agent posing as a middleman. The U.S. Attorney’s Office indicted Apokorin on bribery-related charges in October 2011.

Upon his inauguration in January 2008, Mayor Nutter made it one of his top priorities to demonstrate that Philadelphia could be held to “the highest standards of ethics and accountability.” Upon my appointment, I pledged to help rid the executive branch of corruption.

In countless speeches, we’ve made it clear that this administration is not for sale, that greed isn’t worth the consequences. Most city contractors and employees have gotten the message. The rest should start listening.

Like it or not, Philadelphia’s political culture is changing. Integrity isn’t an afterthought. It’s at the core of how we operate.

Over the next four years, we will continue to promote and protect the best interests of our taxpayers. With your support, we can achieve our goals. With your support, we can make this city a model of excellence for the rest of the country.

Regards,

Amy L. Kurland
THE YEAR IN NUMBERS

Financial Accomplishments

Suspensions [actual].................................$72,369.80
Demotions [2-year reduced salary]............$71,132.00
Pension Disqualification Savings*.............$7,692,153.55
Restitution [funds returned to city]............$600,415.00
Fines/Assessments/Recovery.....................$590,322.20
DROP [employee forfeited DROP retirement
because of OIG investigation].................$213,874.72

TOTAL: $9,240,267.27

Termination Savings

In 2011, OIG cases led to the firing or resignation of
24 city employees, saving the city $2,306,456 based
on two-year salary projections.

The OIG conservatively estimates the financial im-
pact of firings and resignations. Some federal agen-
cies project savings over the remainder of a dis-
missed employee’s career.

Additional Financial Savings

Bonus points generated from an unauthorized busi-
ness rewards account linked to the city’s contract
with Verizon were discovered by the OIG and re-
deemed for $107,600 in gift cards to benefit the city’s
PhillyRising program (see page 10).

The OIG recovered $1,200 in unused Macy’s gift
cards and $662 in Barnes & Noble gift cards, which
were donated to Youth Services Inc. and the William
D. Kelley School respectively.

2011 Case Results

Arrest/Indictment....................................5
Trial/Plea.............................................5
Sentencing..........................................4
Termination.........................................24
Suspension..........................................7
Civil Service Hearing or Arbitration..........2
Demotion.............................................3
Restitution..........................................4
Pension Disqualification.......................18
Pension Disqualification Pending...........10
Other Action.......................................20
Investigation Complete/Action Pending.....19

2011 Case Intake

In 2011, the OIG received 693 complaints, opened
231 cases and closed 126 cases. Of those complaints,
158 involved city employees and 29 involved ven-
dors or contractors doing business with the city.

The opened complaints were assigned as follows:

♦ OIG: 158
♦ OIG/Integrity Officer: 56
♦ OIG/District Attorney: 2
♦ OIG/State: 1
♦ OIG/Federal: 10
♦ OIG/Police: 1

*Calculation based on U.S. Census Bureau life-expectancy projections.
THE YEAR IN NUMBERS

Source of Complaint

- City Employee - 86
- Contractor/Vendor - 1
- Resident - 78
- Business Owner - 9
- Government Agency - 11
- Other - 46

Primary Categories

- Abuse of Time
- Audit
- Misuse of Vehicle
- Fraud
- Misconduct
- Residency Violation
- Theft

Primary Department Complaints

- DHS - 20
- L & I - 15
- Health - 11
- Recreation - 17
- Revenue - 12
- Streets - 20
In May 1984, Mayor W. Wilson Goode Sr. signed an executive order establishing the City of Philadelphia’s Office of Performance Management, which he renamed the Office of the Inspector General nearly a year later. In November 1994, Mayor Edward G. Rendell expanded the OIG’s jurisdiction and scope of inquiry, but the office’s impact was still limited by staffing and budgetary constraints.

That changed in January 2008 with the inauguration of Mayor Michael Nutter, who believed that our city government could police itself if the OIG had experienced leadership at the helm and the necessary resources to conduct fair and thorough investigations.

Mayor Nutter appointed Amy Kurland, a former assistant U.S. Attorney who had spent much of her career prosecuting public corruption cases in Philadelphia, to be Inspector General. He gave Kurland the freedom to investigate based on the merits of each case and increased the OIG’s budget, later separating the OIG from the Mayor’s Office.

The Nutter administration’s investment in oversight has paid off. Over the last four years, the OIG has helped the city save or recover a total of $25.7 million while working with an annual budget of $1.3 million or less. Furthermore, the office’s investigations since 2008 have led to the termination or resignation of 122 city employees and the arrest or indictment of 39 individuals.

Those numbers reflect only a fraction of the OIG’s impact. The OIG isn’t just detecting crimes and improprieties, it’s preventing them. And even some of the city’s harshest critics have recognized that the OIG is holding crooked contractors and city employees accountable for violating the public trust.

But it’s more than that. City employees have rejected the notion that their government is inherently corrupt. They take pride in serving the public, and they’re not afraid to stand up for what’s right. Their bravery is paving the road to reform.
Tipsters

The OIG’s most significant cases have started with complaints from city employees fed up with corruption in their midst. Members of the public have also provided invaluable tips.

This network of watchdogs and whistleblowers has made reform possible throughout city government.

The Integrity Officer Program

Inside 35 city departments, OIG-trained Integrity Officers investigate cases of minor misconduct and recommend appropriate discipline to their commissioners.

Integrity Officers also assist the OIG in major cases and provide insight into how their departments operate. These ambassadors of good government have no doubt doubled the OIG’s impact on the city.

Collaborative Law Enforcement

The OIG has collaborated with local, state and federal authorities to investigate crimes perpetrated by city contractors and employees. In the last four years, these joint investigations have led to 39 arrests or indictments.

Prosecutors have recognized that evidence collected by the OIG is compelling and reliable, and they have increasingly sought out the office’s expertise in cases that involve city employees.
A joint OIG-FBI investigation led to the indictment of Daniel Apokorin, a Villanova-based businessman who allegedly handed a $5,000 bribe to a Philadelphia Commerce Department official. The official immediately reported the bribery attempt to the department’s integrity officer, who then notified the OIG.

As part of a scheme to acquire a vacant property in Tacony from the city quickly, Apokorin and several co-conspirators allegedly gave another $5,000 to an undercover federal agent. This case showed the public that city government can police itself and catch crimes as they occur.

An OIG investigation conducted jointly with the FBI and the U.S. Postal Service found that Barry Jones, principal owner of Mara Management Services Inc. and Management and Technology Services Inc., defrauded the city of more than $1 million by billing for work that had not been performed.

Jones inflated the number of hours worked by himself and several of his subcontractors on invoices that he submitted for payment to the Philadelphia Revenue and Water departments and to Community Behavioral Health, a nonprofit that provides mental health services on the city’s behalf. He pleaded guilty to mail fraud on Aug. 5, 2011.

The U.S. Attorney’s Office is seeking $1.2 million in restitution for the city.
ROOTING OUT FRAUD AND CORRUPTION

Re-fined Living

Following a joint investigation conducted by the OIG and the Philadelphia Police Department, Brian K. Davis and Rev. Richard Cobb were arrested on multiple theft-related charges.

Posing as an inspector from the Department of Licenses and Inspections and acting at Cobb’s direction, Davis allegedly collected more than $10,000 from the owner of a property in Germantown.

When the property owner contested a violation issued by a real L&I inspector, saying that he had already paid numerous fines, L&I checked internal records and found that no payments had been credited to the property. L&I then referred the matter to the OIG.

The property owner told investigators that Cobb, a pastor at St. Mark’s Baptist Church in South Philadelphia, had helped him make arrangements to pay an inspector named “Brian” over several months.

Cobb allegedly persuaded Davis in early 2010 to help him swindle the property owner, telling Davis which fines and fees to seek. In return, Davis allegedly gave Cobb a portion of the proceeds in cash and used some of the money to pay for his own rent.

Police arrested Cobb on April 8, 2011. He was charged with theft, criminal solicitation and related offenses. Davis was arrested on April 27, 2011 and charged with theft, conspiracy, impersonating a public servant and related offenses.

Both men were released on bail. Their trial is scheduled for Spring 2012.

Public Corruption Crimes

Federal and state law provide many avenues for prosecuting those who criminally violate the public’s best interest:

Theft from a program receiving federal funds is charged in a federal criminal case when at least $5,000 has been stolen from a program that has received $10,000 from the federal government.

Mail or Wire Fraud is charged in a federal criminal case where the postal system or a data network has been used in furtherance of a fraud.

Honest Services Fraud is charged in a federal criminal case where the public has been deprived of the “intangible right” to the honest services of a government employee.

Hobbs Act Extortion is charged in a federal criminal case when a public official uses his position to extort money or something else of value from someone.

Bribery is charged in a state criminal case when someone gives, accepts, or solicits something of value in order to influence an individual’s public or legal conduct.

Embezzlement is charged in a state criminal case when an official misuses funds in violation of the public trust.
Mealing and Dealing

An OIG investigation established that Joseph James Sr., the Deputy Chief Information Officer for Communications and Operations, Concetta D. Lilly-Pearson, an Information System Operations Manager, and Frank Punzo, former Deputy Commissioner of Public Property, had accepted meals and gifts from vendors with city contracts, violating a mayoral executive order and provisions of the Philadelphia Home Rule Charter.

James accepted a total of 39 business-related meals from five vendors — Verizon, Comcast, Shared Technologies, Motorola and RCC Consultants — valued at $1,300 between January 2006 and December 2009. Punzo accepted 122 business-related meals valued at $3,153 from those vendors, and Lilly-Pearson accepted two meals from Verizon valued at $151.

James and Punzo also used city resources to set up a secret Verizon Business Link Rewards account, through which they improperly procured more than $48,000 worth of iPods, gift cards, TVs and other items from December 2005 to September 2009.

Punzo and James hid the rewards from the city’s property inventory and distributed items at their own discretion. James kept an iPod for himself and gave two to Lilly-Pearson. The city is performing a full inventory to locate all items ordered through the program.

James was terminated from his position with the Division of Technology while Lilly-Pearson was demoted from hers and given a 16-day suspension. Two-year salary savings from the case amounted to $249,600 for James and $50,592 for Lilly-Pearson. Lilly-Pearson’s suspension saved the city $5,077.65. Punzo resigned in September 2009.
ROOTING OUT FRAUD AND CORRUPTION

Dealing (Continued)

While this case exposed serious misconduct by three high-ranking managers, it also afforded the city a unique opportunity to restore public trust.

Following the OIG’s investigation, James’ lawyer turned in $1,200 in unused Macy’s gift cards, $662 in Barnes and Noble gift cards and two iPods. On the city’s behalf, the OIG donated the Macy’s gift cards to Youth Services Inc., which used the cards to help at-risk teen mothers buy clothing for their children. The OIG donated the Barnes & Noble cards to the William D. Kelley School, which used the cards to purchase specialized textbooks for struggling readers. The OIG also gave one of the iPods to the Kelley School to raffle off at an Honor Roll ceremony.

The remaining balance of the city’s Verizon rewards account, valued at $107,600, was redeemed by the Managing Director’s Office for Lowe’s and Best Buy gift cards to fund community-cleanup projects in economically distressed neighborhoods. The program, known as PhillyRising, is spurring partnership and innovation.

“A very simple gesture on the city’s part, $100 for tools, energizes the community; it serves as a catalyst for positive growth,” says Deputy Managing Director John Farrell, who runs Philly Rising. Manny Citron, an assistant managing director who works in the Frankford area, notes that the gift cards have given PhillyRising “leverage to bring in a lot more people than before to help.”

With strong internal controls in place, every dollar will be accounted for and spent appropriately.

Operation Trick Note

Paid sick leave is available for city employees who are incapacitated with illness or who need to be treated by a physician. To combat abuse of this benefit, the OIG continuously reviews suspicious sick notes.

In 2011, two Youth Study Center kitchen staffers and a counselor resigned after the OIG confronted them with evidence of sick-leave abuse. An effective deterrent, the project remains ongoing.
Certificate of Duplicity

In the wake of an OIG investigation into a sham minority contracting scheme, the city began debarment proceedings against one contractor, removed a second from its list of certified minority businesses and reached a no-fault settlement with a third contractor, which agreed to pay the city $100,000.

The OIG established that William Betz Jr. Inc., JHS and Sons Supply Company and UGI HVAC Inc. colluded to make it appear JHS, a certified minority vendor, had provided equipment and supplies for a government-funded weatherization project when JHS was paid only for the use of its name and minority certification.

In June 2010, UGI signed a $1 million contract with the Philadelphia Housing Development Corporation to make houses more energy-efficient for low-income residents of Philadelphia. UGI pledged to hire a subcontractor certified by the city as a Minority, Women or Disadvantaged Business Entity and later informed the city that JHS would provide boilers, hot-air furnaces and chimney liners for the weatherization project. However, investigators discovered that UGI purchased those products from Betz, which paid JHS 3 percent of the contract proceeds from UGI to pretend JHS was the supplier.

The vendors falsely represented their compliance with anti-discrimination and economic-opportunity policies designed to help disadvantaged businesses compete for city contracts.
Duplicity (Continued)

When apprised of the OIG’s findings, the Office of Economic Opportunity removed JHS from its list of certified minority vendors and the Law and Procurement departments initiated debarment proceedings against Betz. The OIG and the Law Department then finalized the settlement agreement with UGI.

As part of its settlement agreement with the city, UGI has promised to raise minority-owned business participation to 50 percent on a future weatherization contract with PHDC. UGI has also created new policies and procedures to ensure that its employees comply with the city’s anti-discrimination and economic-opportunity policies.

No companies are currently on the city’s debarment list. The Law Department has not initiated debarment proceedings against a company since 2007, but the sanction was warranted in this case because Betz disregarded the interests of the city and of legitimate minority businesses.

Rudy Betz, president of William Betz Jr. Inc., brokered the deal among the three companies. Investigators found that UGI and Betz had generated false invoices to cover their tracks, and discovered Betz had used JHS as a sham minority contractor on at least 14 other city contracts. If debarred, William Betz Jr. Inc. would be banned from conducting business with the city for up to three years, the maximum penalty.

The Office of Housing and Community Development’s compliance unit first identified evidence of the scheme and referred the matter to the OIG.

Standing Up for Disadvantaged Businesses

The Betz case was the first in a series of investigations that has developed from the OIG’s partnership with the Office of Economic Opportunity. The offices share a common goal — to make Philadelphia a great place to work and live — and are committed to promoting diversity in the local economy.

Companies that fail to meet the city’s minority business requirements have been put on notice: The city will not allow anyone to get away with using sham minority businesses as pass-throughs. The worst offenders face the possibility of debarment, but all will suffer the consequences. The city will not let greedy companies circumvent its efforts to support qualified yet financially disadvantaged companies.
ARRA Compliance and Control Initiative

The OIG and the Integrity Office continue to monitor $273 million in federal stimulus funds that the city received through the Recovery Act of 2009. The compliance team has formally evaluated all 34 grants, visited 15 grant administrators, analyzed records for 12 grants and completed 10 compliance-review reports. The team has also issued one policy recommendation report.

The Cost of Crime

Most city employees receive hard-earned pension benefits from the city treasury when they retire. But under the Philadelphia Code, those convicted of public corruption-related crimes committed within the scope of their official duties forfeit their right to such benefits.

Since January 2008, the OIG has been working with the Law Department and the Board of Pensions and Retirement to identify and disqualify city employees convicted on felony counts of theft, bribery, embezzlement, perjury or job-related malfeasance.

The project has transformed an ad hoc system of gleaning reports of conviction from newspapers and court documents into a proactive, well-coordinated effort to remove criminals from the pension rolls.

In 2011 alone, the Pension Board approved 18 disqualification requests submitted by the OIG and recovered city pension contributions from 11 employees who withdrew their own contributions in anticipation of being arrested or indicted. The total savings generated by this collaboration in 2011 was nearly $7.7 million.

Still, challenges remain. Some city employees convicted before January 2008 continued to receive pension benefits long after they were sentenced. The OIG commends the Philadelphia Daily News for shedding light on this issue.

In July 2011, the Daily News reported that the city had paid out $1.2 million in pension benefits to felons since 1999. Those payments included $310,000 to Walter Helinsky, a former mounted police officer convicted of a sex crime against a minor.

The OIG has since initiated pension disqualification proceedings against all eight felons. Five disqualification requests have been approved as of February 2012.
STRENGTHENING POLICIES

Protecting Our Children

At the request of the city Department of Human Services, the OIG investigated an informal placement system for the children of women incarcerated in the Philadelphia Prison System. The OIG discovered that for more than a decade, chaplains in the Prison System had been persuading female inmates to allow the Mennonite Caregivers Group, an unlicensed organization, to take care of the inmates’ children while they were behind bars.

Without the advice of legal counsel, inmates at Riverside Correctional Facility signed agreements granting temporary custody to the Mennonites. The agreements were problematic for many reasons: Before a child could be returned to the mother, the Mennonites had to agree that the mother was fit to care for her own child. Furthermore, the agreement suggested the mother needed a court order to get her child back and that the Mennonites would not be held liable in the event of an accidental death, illness or injury to the child.

While there was no evidence that the Mennonite Caregivers Group engaged in any misconduct, the potential for harm was great. The placement system lacked an official process for making sure caregiver families had no history of child abuse or criminal behavior, and the Mennonites did not keep a master list of where the children were placed, which could have allowed children to live in unsafe environments. In one case, a mother spent months tracking down her son after she was released from prison because a caregiver family had changed its phone number.

During the OIG’s investigation, Prison Commissioner Louis Giorla implemented a written policy for prison social workers to follow when placing inmates’ children with caregivers. The OIG applauded Commissioner Giorla for putting new safeguards in place before the investigation was complete, and later released a full policy report to Commissioner Giorla and the public. (The full report is available online at www.phila.gov/oig.) Together, the OIG and the Prison System have made sure that inmates’ children will only be placed with licensed caregivers.

Closing Loopholes

Because weak policies are easily abused and frequently overlooked, the OIG examines not only violations of the rules but the rules themselves. In 2011, the OIG issued policy recommendations to departments in four other cases. Significant changes have been made, including extra safeguards to prevent cashiers from pocketing payments to the city and a process to ensure that overtime pay is accurately calculated. By correcting ineffective policies, the city continues to spur reform.
CHANGING THE CULTURE

Supervisor Accountability

Many remedies for misconduct exist in city regulations and departmental handbooks, but the rules are only as good as those who enforce them. That’s why the OIG is keeping a close eye on supervisors in departments known for patterns of abuse.

Employees following strong leadership are less likely to steal or commit fraud. They are more productive, more efficient and more committed to the greater good.

Bolstering Deterrence

When the city fires unethical employees and replaces them with honest civil servants, taxpayers get more for their money. But termination is also a powerful deterrent. When bad behavior is met with harsh consequences, the lesson is learned by the wayward employees and those around them. Fraud, waste and abuse also decline when employees are suspended or demoted. For every offense, there must be appropriate discipline.

Prudent Discipline

The OIG recommends discipline only when an allegation has been fully sustained by the evidence. In many cases, the allegations are baseless, and hard-working civil servants are vindicated. In others, the facts are clear and compelling.

When departments receive OIG reports of investigation, they can rest assured that the evidence will withstand scrutiny before a civil court or the Civil Service Commission.

Engaging the Public

Over the past four years, the OIG has grown in size and strength thanks to public support for its mission. Residents and city officials alike have recognized that the OIG is a wise investment, and in return, the OIG has advanced their interest in good government by engaging in a larger dialogue about how to create lasting reform.

From the Philadelphia Association of Certified Fraud Examiners to the Delaware Valley Association of Corporate Counsel, from WHYY’s Radio Times to a U.S. State Department mission to train investigators in the Democratic Republic of Congo, Inspector General Amy Kurland has shared success stories and addressed the challenges that remain in the fight against corruption.
CHANGING THE CULTURE

Public (Continued)

In partnership with the International Visitors Council, the OIG has advised watchdogs from China, Moldova, Vietnam and other developing democracies how to combat corrupt schemes in their countries by applying lessons learned from OIG investigations in Philadelphia.

In every speaking engagement, Kurland emphasizes a central point: Philadelphia’s political culture is changing, but corruption can’t be eliminated unless Philadelphians make an unwavering commitment to the greater good.

Bearing Witness

Corruption isn’t static. It shrinks back under a constant spotlight and grows when no one is looking. Fighting it requires vigilance and a willingness to speak out against every instance of waste, fraud, abuse and misconduct.

City employees who witness corruption have a duty to report it immediately, but the responsibility can’t be theirs alone. All Philadelphians are stakeholders in their city’s government, and progress will stall if violations of the public trust go unreported.

If you know of city employees abusing their position for personal benefit, call the OIG. If you see vendors trying to influence public servants with meals, gifts or money, report it. If you suspect that companies are hiring sham subcontractors as pass-throughs, turn them in.

You are the most important force in the fight against corruption. Our mission will not succeed without you.