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**The Inspector General
Of the Air Force**

Report of Investigation (S8127P)

Mr. Richard W. Lombardi

April 2015

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REPORT OF INVESTIGATION (Case S8127P)

CONCERNING

MR. RICHARD W. LOMBARDI

PREPARED BY

March 2015

I. INTRODUCTION

This investigation was directed in response to a memorandum filed by [REDACTED] a contracting officer for [REDACTED] (Ex 1) [REDACTED] was the contracting officer [REDACTED] contract on behalf of its client, Secretary of the Air Force for Acquisition (SAF/AQ), [REDACTED] memorandum was addressed to [REDACTED] [REDACTED] GSA, Region 7, notifying him of a possible violation of the Procurement Integrity Act (PIA). The memorandum was then first forwarded to the GSA Office of the Inspector General, then to the Air Force Office of Special Investigations (OSI) and finally forwarded to the Air Force Inspector General for action. OSI declined to pursue a criminal investigation as it found "no harm done" to the United States Air Force, but believed the matter appropriate for an IG investigation as a potential violation of the Act by a signatory of a non-disclosure agreement, the subject, Mr. Richard W. Lombardi, Principal Deputy Assistant Secretary of the Air Force for Acquisition (SAF/AQ), located at the Pentagon, Washington DC.¹

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SAF/IGS completed a complaint analysis on 17 Nov 14 and The Inspector General approved an investigation into the allegation of misconduct by Mr. Lombardi. (Ex 2) The case was assigned to [REDACTED] who holds a SAF/IG appointment letter dated 20 Aug 14 and the investigation started on 21 Nov 14. (Ex 13:1) On 16 Apr 15 an additional allegation was approved and added to the investigation. Mr. Lombardi was notified (Ex 30) and acknowledged the new allegation and in response, provided a written statement for consideration. (Ex 31)

In the course of the investigation, to include the Complaint Analysis phase of this investigation, eight witnesses and the subject provided sworn testimony:

¹ At the time of the alleged violation, Mr. Lombardi held the position of Deputy Director for Acquisition Integration, SAF/AQ (SAF/AQX), Pentagon, Washington DC. (Ex 2:3)

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- Mr. Richard W. Lombardi, Principal Deputy Assistant Secretary of the Air Force, SAF/AQ, Pentagon, Washington DC (Ex 14)
- [REDACTED] (SAF/AQX), Pentagon, Washington DC (Ex 16)
- [REDACTED] SAF/AQX, Pentagon, Washington DC (Ex 17)
- [REDACTED] SAF/AQX, Pentagon, Washington DC (Ex 18)
- [REDACTED] SAF/AQX, Washington, DC (Ex 19)
- [REDACTED] General Services Administration (GSA), Fort Worth, TX (Ex 20)
- [REDACTED] Acquisitions Operations Division, GSA, Fort Worth, TX (Ex 21)
- [REDACTED] Acquisitions Operations Division, GSA, Fort Worth, TX (Ex 22)
- [REDACTED] Assistant Acquisition Services, GSA, New Orleans (Field Office), LA (Ex 15)

At no time prior to or during the subject interview did the IO suspect that Mr. Lombardi was guilty of criminal misconduct. Therefore, this IO treated him as a subject and not a suspect, and he was not provided a rights advisement.

II. SCOPE AND AUTHORITY

The Secretary of the Air Force has sole responsibility for the function of The Inspector General of the Air Force.² When directed by the Secretary of the Air Force or the Chief of Staff of the Air Force, The Inspector General has the authority to inquire into and report on the discipline, efficiency, and economy of the Air Force and perform any other duties prescribed by the Secretary or the Chief of Staff.³ The Inspector General must cooperate fully with The Inspector General of the Department of Defense.⁴ Pursuant to Air Force Instruction (AFI) 90-301, *Inspector General Complaints Resolution*, 23 Aug 11 (Incorporating Change 1, 6 Jun 12), paragraph 1.13.4, The Inspector General has oversight authority over all IG investigations conducted at the level of the Secretary of the Air Force. (Ex 11:2)

Pursuant to AFI 90-301, paragraph 1.13.3.1, the Director, Senior Official Inquiries Directorate (SAF/IGS), is responsible for performing special investigations directed by the Secretary, the Chief of Staff, or The Inspector General and all investigations of senior officials.

² Title 10, United States Code, Section 8014

³ These authorities are outlined in Title 10, United States Code, Section 8020

⁴ Title 10, United States Code, Section 8020(d)

AFI 90-301 defines senior official as any active or retired Regular Air Force, Air Force Reserve, or Air National Guard military officer in grades O-7 (brigadier general) select and above, and Air National Guard Colonels with a Certificate of Eligibility (COE). Current or former members of the Senior Executive Service (SES) or equivalent and current and former Air Force civilian Presidential appointees are also considered senior officials. (Ex 11:2, 4)

One of several missions of The Inspector General of the Air Force is to maintain a credible inspector general system by ensuring the existence of responsive complaint investigations characterized by objectivity, integrity, and impartiality. The Inspector General ensures the concerns of all complainants and subjects, along with the best interests of the Air Force, are addressed through objective fact-finding.

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III. BACKGROUND

[REDACTED], was the incumbent contractor and has held the AFTAS Pro and SITT contracts for at least the last 10 years.⁵ (Ex 15:2) The two contracts were merged in the current contract bid under the umbrella of AFTAS Pro. (Ex 19:2) The AFTAS Pro contract directly supports SAF/AQ by providing enterprise-wide acquisition transformation and integration support. (Ex 1:1) The procurement was conducted by GSA because SAF/AQ did not have a contract management office. GSA had the capacity to turn the contract in a shorter period of time, and it had previously worked the contract. (Ex 19:3) The solicitation for the AFTAS Pro contract went out 6 Feb 14. (Ex 3:1) Four companies were considered for the award of the contract: [REDACTED]. (Ex 4) [REDACTED] was identified as the presumptive awardee of the current contract with a bid that was [REDACTED]⁶ (Ex 3:1-2; 4) On 9 Apr 14, GSA called [REDACTED] to notify SAF/AQ of its intended award of the contract to [REDACTED] (Ex 19:12-13) From 11 Apr 14 to 2 Jul 14, GSA and SAF/AQX engaged in a number of telephone calls about the award. (Ex 8) The personnel involved in these phone calls included Mr. Lombardi, [REDACTED] (Ex 8:1)

On 2 Jul 14, [REDACTED] was awarded the AFTAS Pro contract and [REDACTED] was notified. (Ex 9:1) On 14 Jul 14, [REDACTED] filed a protest with the Government Accountability Office (GAO) pursuant to 31 USC §§ 3551-3556. (Ex 3) In reviewing the protest, the GSA contacting officer for the procurement, [REDACTED] found that there were references in the protest that mirrored conversations specifically between GSA and SAF/AQ. (Ex 1) Thereafter, he filed his

⁵ [REDACTED] from Feb 03 to Sep 12. (Ex 26:2) During [REDACTED] time, [REDACTED] was the contractor for the AFTAS Pro contract, and [REDACTED] was responsible for overseeing [REDACTED] on a "day-to-day basis," resolving questions as necessary. (Ex 18:2)

⁶ The difference between [REDACTED] bid and the Internal Government [REDACTED] (Ex 4)

memorandum notifying of possible Procurement Integrity Act violation, which became the basis of this complaint. (Ex 1)

IV. CHRONOLOGY

- 6 Feb 14 – Solicitation for AFTAS Pro contract released. (Ex 3:1)
- 9 Apr 14 - ██████████ disclosed to Mr. Lombardi that GSA intends to award the AFTAS Pro contract to ██████████. (Ex 19:12-13)
- 10 Apr 14 - Email from ██████████ where he mentioned a request from ██████████ to delay announcement of the award to ██████████ until Mr. Lombardi can be briefed by GSA. (Ex 4)
- 10 Apr 14 - ██████████ requested GSA brief his supervisor Mr. Lombardi. (Ex 4)
- 10 Apr 14 – Mr. Lombardi signed a Non-Disclosure Agreement. (Ex 10)
- Between 10 Apr 14 and 11 Apr 14 – Mr. Lombardi contacted ██████████ (Ex 26), for advice.⁷ (Ex 14:9)
- 11 Apr 14 – Telephone call between GSA and SAF/AQ with Mr. Lombardi's participation, discussing the evaluation process. (Ex 5)
- 16 Apr 14 – Second telephone call between GSA and SAF/AQ with Mr. Lombardi's participation. (Ex 6)
- May 14 – ██████████ replaced Mr. Lombardi as the Deputy Assistant Secretary for Acquisition Integration. (Ex 16:2)
- Jun 14 – GSA contacted the four companies giving them an opportunity to change/update their initial bid – the rankings according to GSA stayed the same. (Ex 19:18)

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⁷ The IO concluded that Mr. Lombardi's discussion with ██████████ occurred between 10 Apr 14 and 11 April 14. Mr. Lombardi signed the NDA on 10 Apr 14 and initially had a phone call with GSA on 11 Apr 14. Mr. Lombardi testified that he spoke with ██████████ prior to his discussion with GSA (Ex 14:9) and acknowledged that doing so constituted a violation of the NDA that he signed on 10 Apr 14. (Ex 14:13) Therefore, The IO concluded, by a preponderance of the evidence, that the phone call occurred after Mr. Lombardi signed the NDA on 10 Apr 14 but prior to speaking with GSA on 11 Apr 14.

- 23 Jun 14 – Final telephonic call between GSA and SAF/AQ with Mr. Lombardi's participation prior to notifying the incumbent [REDACTED] and making the award to [REDACTED] public. (Ex 7)
- 2 Jul 14 - Notification to [REDACTED] of presumptive award to [REDACTED] (Ex 9:1)
- 2 Jul 14 - [REDACTED] is awarded the AFTAS Pro contract. (Ex 9:3)
- 14 Jul 14 - [REDACTED] filed the protest. (Ex 3)
- 23 Jul 14 - [REDACTED] notified the Head of the Contracting Office (HCA) of possible Procurement Integrity Act violations. (Ex 1)

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V. ALLEGATIONS, FINDINGS, STANDARDS, ANALYSIS AND CONCLUSIONS

Due to the related nature of these two allegations, they will be discussed concurrently throughout the report.

ALLEGATION 1. On or about 10 April 14, Mr. Richard W. Lombardi disclosed information concerning the task order evaluation process for GSA Task Order ID07130035, Air Force Technical and Analytic Support in Professional Services, to a person outside the Department of Defense in violation of his signed Certificate of Non-Disclosure, dated 10 Apr 14.

[REDACTED]

FINDINGS OF FACT.

On 9 Apr 14, Mr. Lombardi was notified by [REDACTED] of GSA's intent to award the contract to [REDACTED]. (Ex 19:12-13) Mr. Lombardi had concerns about the contract being awarded to [REDACTED] and wanted to discuss his concerns with GSA. (Ex 14:8)

On 10 Apr 14, Mr. Lombardi signed a Non-Disclosure Agreement (NDA) regarding the task order evaluation process. (Ex 10) The NDA stated in part:

⁸ The original allegation was modified by adding "et seq." after 41 USC §2101. Mr. Lombardi was informed via email of the administrative change. (Ex 24)

procurement contract, if that information previously has not been made available to the public or disclosed publicly:

(A) Cost or pricing data (as defined in section 2306a (h) of title 10 with respect to procurements subject to that section and section 3501 (a) of this title with respect to procurements subject to that section).

(B) Indirect costs and direct labor rates.

(C) Proprietary information about manufacturing processes, operations, or techniques marked by the contractor in accordance with applicable law or regulation.

(D) Information marked by the contractor as “contractor bid or proposal information”, in accordance with applicable law or regulation.

(3) Federal agency.— The term “Federal agency” has the meaning given that term in section 102 of title 40.

(4) Federal agency procurement.— The term “Federal agency procurement” means the acquisition (by using competitive procedures and awarding a contract) of goods or services (including construction) from non-Federal sources by a Federal agency using appropriated funds.

...

(7) Source selection information.— The term “source selection information” means any of the following information prepared for use by a Federal agency to evaluate a bid or proposal to enter into a Federal agency procurement contract, if that information previously has not been made available to the public or disclosed publicly:

(A) Bid prices submitted in response to a Federal agency solicitation for sealed bids, or lists of those bid prices before public bid opening.

(B) Proposed costs or prices submitted in response to a Federal agency solicitation, or lists of those proposed costs or prices.

(C) Source selection plans.

(D) Technical evaluation plans.

(E) Technical evaluations of proposals.

(F) Cost or price evaluations of proposals.

(G) Competitive range determinations that identify proposals that have a reasonable chance of being selected for award of a contract.

(H) Rankings of bids, proposals, or competitors.

(I) Reports and evaluations of source selection panels, boards, or advisory councils.

(Ex 12:1-2)

41 U.S. Code § 2102 - Prohibitions on disclosing and obtaining procurement information

(a) Prohibition on Disclosing Procurement Information.

(1) In general.— Except as provided by law, a person described in paragraph (3) shall not knowingly disclose contractor bid or proposal information or source selection information before the award of a Federal agency procurement contract to which the information relates.

...

(3) **Application.**— Paragraph (1) applies to a person that—

(A) (i) is a present or former official of the Federal Government; or

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(ii) is acting or has acted for or on behalf of, or who is advising or has advised the Federal Government with respect to, a Federal agency procurement; and
(B) by virtue of that office, employment, or relationship has or had access to contractor bid or proposal information or source selection information.
... (Ex12:5)

Certificate of Non-Disclosure – signed by Mr. Lombardi on 10 Apr 14

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1. I agree, unless authorized by the GSA PCO only, that I will not disclose any information concerning this task order evaluation process to: (1) any offerors or potential offerors (including sub-contractors) except as part of any authorized discussions; (2) any person outside Department of Defense (DOD) (e.g., trade association representative, reporter); and 3 any person within DOD (including superiors, supervisors, and associates). (Ex 10)

...

ANALYSIS.

[REDACTED]

[REDACTED]

The Protest

[REDACTED]

Specifically, he reiterated that there were excerpts from the protest identified by [REDACTED] that either demonstrated knowledge of information that was not public and/or proprietary, and should not have been shared with the protestor; and/or seem to be a verbatim

account of conversations between GSA employees and SAF/AQ personnel who were subject to NDAs during the procurement process. (Ex 1:2-3)

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[Redacted]

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[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

The Disclosure

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While the IO was investigating the allegations made by the complainant, it came to light that Mr. Lombardi had contacted [REDACTED] to discuss his frustration with GSA because of their handling of the AFTAS Pro contract award. The IO found that Mr. Lombardi, [REDACTED] are friends. Mr. Lombardi testified that he and [REDACTED] had a personal relationship with the [REDACTED] (Ex 14:13-14) This information and the quality of the relationship was corroborated by [REDACTED] who testified that [REDACTED] are *very good* friends, and [REDACTED] who testified that Mr. Lombardi, [REDACTED] are all *good* friends. (Ex 16:7, Ex 18:21) (*emphasis added*)

[REDACTED] retired from government service on [REDACTED] (Ex 18:2) That day, he contacted the Air Force Ethics Office (SAF/GCA) to inquire as to the propriety of buying administrative services from [REDACTED] when he starting consulting services and received a reply that there would be no issue with [REDACTED] being a customer of [REDACTED] (Ex 27) On 15 May 14, [REDACTED] filed a DD Form 2945, *Post-Government Employment Advice Opinion Request*, with SAF/GCA indicating that he would like to be a consultant to [REDACTED] and his proposed start date would be Jun 14. (Ex 28) SAF/GCA, by memorandum dated 12 Jun14, informed [REDACTED] that the Procurement Integrity Act did apply to him and that he had an obligation to continue to protect source selection or contractor bid or proposal information; and the type of services he could provide to [REDACTED]. (Ex. 29)

During his interview, [REDACTED] acknowledged that he was working as a contractor for [REDACTED] engaged in the SMART contract:

You know what I'm saying. I still have the conflict of interest. I was too close to it, and I had, I, I did get permission from general counsel to work with [REDACTED] but it was not to work on the AFTAS Contract. It was to work on the SMART contract. (Ex 18:5)

Mr. Lombardi testified about his Apr 14 discussion with [REDACTED]

... so I did reach out to my predecessor and I said that we're having some issues with respect to GSA. My predecessor had had a long history with GSA and successfully worked with them and so I said, I'm having a, I'm having a hard time articulating my concerns, my issues where the risks are. Do you have any ideas in which you might be able to, to help me think through and, **you know, uh, because I'm concerned with**

respect to, uh, an award for about half of what we historically had done this work for. [emphasis added] And so, he suggested for me to, to go back to them and ask them if they would reopen discussions because he thought that maybe by virtue of reopening discussions people would have a better understanding of what the really work is and everything, and so every offer would have an opportunity to go back, re-look at their proposal, look at where their deficiencies were and try to fix them as part, and, and then re-propose. (Ex 14:9)

Did Mr. Lombardi violate the NDA by his disclosure to Mr. Durante? Yes.

On 10 Apr 14, Mr. Lombardi signed the NDA, which prohibited him from disclosing any information concerning the task order evaluation process to a non-DoD employee. (Ex 10) Mr. Lombardi spoke to [REDACTED] (a former DoD employee) and during that conversation Mr. Lombardi told [REDACTED] that GSA intended to make “an award for about half of what we historically had done this work for.” (Ex 14:9) This comment constituted information about the task order evaluation. The IO found no evidence that Mr. Lombardi identified the particular acquisition, the intended awardee, the actual bid price, or the Internal Government Cost Estimate (IGCE) amount; however, [REDACTED] surmised that their conversation related to the AFTAS Pro procurement. (Ex 18:3)

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The IO concluded that Mr. Lombardi’s discussion with [REDACTED] occurred between 10 Apr 14 and 11 Apr 14. Mr. Lombardi initially had a phone call with GSA on 11 Apr 14. Mr. Lombardi testified that he spoke with [REDACTED] prior to his discussion with GSA (Ex 14:9) and acknowledged that doing so constituted a violation of the NDA that he signed on 10 Apr 14. (Ex 14:13) Therefore, the IO concluded that the phone call occurred after Mr. Lombardi had signed the NDA on 10 April 14 but prior to speaking with GSA on 11 Apr 14.

Accordingly, the IO found by a preponderance of the evidence that Mr. Lombardi’s discussion with [REDACTED] constituted a breach of the NDA because he revealed information concerning the task order evaluation to [REDACTED] a person outside the DoD.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[Redacted]

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[Redacted]

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[REDACTED]

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CONCLUSION.

The IO concluded that on 10 Apr 14, Mr. Lombardi spoke with his [REDACTED] [REDACTED] a non-government employee and close friend of the [REDACTED] about his concerns regarding GSA's award of the Air Force Technical and Analytic Support in Professional Services (AFTAS Pro) contract. This discussion constituted a breach of the NDA because Mr. Lombardi disclosed information, which represents information about the task order evaluation process. The allegation that on or about 10 April 14, Mr. Richard W. Lombardi disclosed information concerning the task order evaluation process for GSA Task Order ID07130035, Air Force Technical and Analytic Support in Professional Services, to a person outside the Department of Defense in violation of his signed Certificate of Non-Disclosure, dated 10 Apr 14 was **SUBSTANTIATED**.

[REDACTED]

VI. SUMMARY

ALLEGATION 1. On or about 10 April 14, Mr. Richard W. Lombardi disclosed information concerning the task order evaluation process for GSA Task Order ID07130035, Air Force Technical and Analytic Support in Professional Services, to a person outside the Department of Defense in violation of his signed Certificate of Non-Disclosure, dated 10 Apr 14 was **SUBSTANTIATED**.

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- The preponderance of evidence supported the conclusion that Mr. Lombardi inappropriately disclosed information about the task order evaluation process to a person outside the Department of Defense in violation of his signed Certificate of Non-Disclosure. On 10 Apr 14, Mr. Lombardi spoke with Mr. Durante, a non-government employee, about Mr. Lombardi's concerns regarding GSA's award of the AFTAS Pro contract. Since this discussion with a non-DoD employee related to the task order evaluation process, the disclosure constituted a breach of the NDA.

[REDACTED]

[REDACTED]

[REDACTED] Colonel, USAF
Investigating Officer

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I have reviewed this Report of Investigation and the accompanying legal review and I concur with their findings.

GREGORY A. BISCONE
Lieutenant General, USAF
The Inspector General