

Attachment A

Report of Investigation



United States Department of the Interior
BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT

April 3, 2025

To: Gavin Frost
Acting Associate Solicitor
Division of Employment and Labor Law

From: Mark Guberman
Manager
Employee and Labor Relations Branch

Re: Report of Investigation

On April 1, 2025, Cynthia Piper, Acting Associate Director, Bureau of Safety and Environmental Enforcement, notified me that Departmental management had instructed and authorized me to conduct an administrative inquiry concerning the workplace behavior of four employees:

1. Darren Ash – Chief Information Officer
2. Stanley Lowe – Chief Information Security Officer
3. Tony Irish – Associate Solicitor, General Law Division
4. Julie Bednar – Senior Advisor (formerly the Associate Director, Human Resources Directorate, Interior Business Center)

I conducted interviews with the above individuals on April 3, 2025.

On April 1, 2025, I began the investigation by speaking, separately, with the following individuals:

1. Tyler Hassen – Senior Advisor to the Secretary
2. Stephanie Holmes – Acting Chief Human Capital Officer
3. Katrine Trampe – Advisor to the Secretary

On April 2, 2025, I spoke with Keith O'Neil, Associate Director for Human Resources Directorate, Interior Business Center.

Holmes advised that the concerns regarding the four referenced employees involved the request that she, Trampe and Hassen had made to obtain access to several Departmental systems, most notably the Federal Personnel Payroll System (FPPS) and the credentialing systems to allow the ability to create, suspend and decommission email accounts. [NOTE: most of the concerns noted below by Holmes, Trampe and Hassen relate to FPPS access but they also sought, and encountered difficulty obtaining the ability to create/suspend/delete user accounts in the DOI network].

Holmes stated that since late February, she had been seeking to obtain complete administrator access to FPPS to allow her to view, request, approve and process actions in FPPS for herself, Trampe and Hassen. Holmes noted that her request was in fulfillment of an Executive Order authorizing such systems access (Establishing And Implementing The President's "Department Of Government Efficiency" – The White House). The request was approved by Jarrod Agen, Senior Advisor to the Secretary, on February 27, 2025

Email exchanges provided by Holmes show that she initiated her request for such access on February 24, 2025 (see emails provided by Holmes). Initially, her communications were with the Office of Human Capital (OHC). At some point in March, 2025, Holmes and Trampe began interacting with the Office of the Chief Information Officer (OCIO), the Interior Business Center (IBC) and the Office of the Solicitor (SOL) (through Irish) as the access being sought could only be provided through those two offices. There are several email exchanges including OCIO and IBC officials and there were several conference calls as well to discuss.

Holmes advised that in working with OCIO and IBC, it became clear to her that Ash, Lowe, Irish and Bednar did not support providing the requested access. Holmes formed the opinion that they collectively sought to subvert, obstruct and delay the process to provide access to FPPS. Holmes stated that she had no concerns with any individuals asking questions or explaining systems risks, but she believed the four employees' action went beyond this into the realm of subversion, obstruction and delay.

Specifically, Holmes noted that Ash, as the Chief Information Officer, did not speak much during the calls and there are no emails expressly from/to Ash. Holmes stated that she holds Ash accountable for the obstruction and delays given his role and that the referenced Executive Order very clearly authorized her, Trampe and Hassen to have the requested FPPS access.

Holmes advised that Lowe was an active participant on the calls with OCIO, IBC and Irish and she found him to be particularly obstructionist. According to Holmes, Lowe raised repeated objections to providing the requested access and he did not seek to facilitate their access to FPPS but was, instead, a hindrance to obtaining such access.

Irish, also and similar to Lowe, appeared to be obstructing their request for FPPS access rather than helping facilitate the access. Irish also was responsible for providing an objectionable memo (the "Memo") for the Secretary's signature (discussed further below).

Bednar, according to Holmes, also played a role in what Holmes perceived as delay and obstructionist tactics. As described by Holmes, rather than providing the requested access as quickly as possible, Bednar appeared to contribute to the delays. As an example, there is an email from Bednar dated March 10, 2025 in which she explains the next steps to be taken to provide Holmes, Trampe and Hassen FPPS access. However, there was no follow-up before March 24, 2025 when Holmes reached out via email on that date for an update (see emails provided by Holmes).

At some point towards late March, 2025, Holmes and Trampe were advised that they had been provided the requested access and participated in FPPS training. However, during the training, they realized that not all functions were available to them and that they had not actually been provided the full administrator rights that had been requested by them. This initiated additional discussion on March 25 and 26, culminating with a conference call on Thursday, March 27 with Holmes, Trampe, OCIO (including Ash and Lowe), IBC (including Bednar) and Irish.

During the March 27 call, Holmes stated that Irish raised the numerous concerns that had been discussed previously and advised that he would provide a decision memo for the Secretary's signature. With the Secretary's signature, Irish advised, the full administrator access to FPPS could be provided. Irish later provided Holmes a hard copy of the Memo for her to transmit to the Secretary. Holmes did not see the necessity of the Memo as the Executive Order already authorized them to have the requested FPPS access and the Secretary, she had advised, was fully on board with the request. Holmes viewed the Memo as further obstructionist tactics and provided the impression to her that, at least as to Irish, there was a concern

she, Trampe and Hassen could not be trusted with having the administrator access. Holmes did not provide a copy of the memo to the Secretary.

Holmes confirmed that she is aware of the articles that have appeared in the New York Times, Wired and other publications concerning the issues surrounding the request for FPPS access. Holmes further advised that she did not discuss the matter with any journalist nor provide any journalist access to the Memo.

Trampe corroborated all of the above (with exception to the contents of the Memo as she stated she was not provided a copy of it and has not seen it). Trampe further advised that, when initially seeking FPPS and credentialing access, she also sought access to the systems housing contracts and grants and had no difficulty obtaining this access. Trampe viewed the various phone calls and email exchanges as tactics to deny and obstruct the request for FPPS access. Trampe stated that she did not understand why OCIO and IBC continued to cite to Department policy when, as she understood it, the Executive Order superseded any policy restrictions. Trampe noted that she perceived the calls as "set-ups," meaning that she saw the calls as a way to obtain information from her and Holmes regarding the requested access so as to be able to provide justifications for further delay and obstruction.

Trampe also mentioned a phone conversation sometime in the last full week of March that included Bednar and other IBC individuals. During the call, Trampe asked Bednar to provide Trampe the name and contact information of the IBC employee with whom Trampe could discuss payroll data. According to Trampe, Bednar refused to provide this information.

Hassen confirmed all the above as well, although he was not on many of the phone calls and relied on Holmes and Trampe for updates. Hassen said that he was not personally interested in obtaining FPPS access and, although it is possible it has been provided to him, he has no expectation of utilizing such access.

Hassen stated that he is aware Holmes and Trampe had sought for a number of weeks access to FPPS and it became clear to him over time that the back and forth with OCIO and IBC was a "colossal waste of time." Hassen was frustrated that the process was taking so long and, during the last week of March, he became even more frustrated upon learning that, despite all of the communications, full administrator access still had not been provided as requested.

Hassen stated that Holmes told him about the Memo. According to Hassen, Holmes said that the Memo did not make sense and carried the presumption that they could not be trusted and had nefarious motives for wanting FPPS access.

O'Neil advised that he believed that Jennifer Ackerman ultimately authorized Holmes, Trampe and Hassen to have administrator access and that such access was provided on Saturday, March 29, 2025. O'Neil provided emails confirming these matters (see emails provided by O'Neil).

Lowe advised that he became familiar with the requests for access by Holmes and Trampe in mid to late March 2025 when he was requested to review a risk assessment memo that had been prepared by IBC. Lowe made some contributions to the risk assessment memo and did not express any concerns with providing the requested access.

On March 27, Lowe attended a meeting with, based on his recollection, Holmes, Trampe, himself, Ash, Bednar, Irish, Christopher Lawson, Jennifer Ackerman, Cynthia Piper, Quan Boatman, Karen Matragrano and perhaps others. This meeting was the first time Lowe says he understood that Holmes and Trampe were seeking complete access to FPPS.

According to Lowe, Irish kicked-off the meeting and asked Holmes and Trampe questions to understand their requirements. Matragrano also provided information regarding how systems access worked and the process that involved human resources and personnel security.

Lowe advised that Irish asked a number of questions and discussed various statutory authorities. Holmes and Irish discussed the authority provided by an Executive Order upon which Holmes based her request. Lowe said that he provided some information on the reasons that certain risk mitigation measures existed with the various network systems.

Lowe's impression from the meeting was that Holmes and Trampe were frustrated by their interactions with Irish. Lowe also advised that there was no discussion of a memorandum for the Secretary's approval during this meeting.

At a subsequent meeting, attended by many of the same individuals from the earlier meeting but not including Holmes or Trampe, there was discussion on how to best meet the requirements expressed by Holmes and Trampe. Irish did not believe it was within Lowe or Ash's authority to approve the requested access. Accordingly, it was decided that the earlier risk assessment memorandum, which was 16 pages long, could be modified into what became the Memo.

Lowe said that he took the lead in crafting the Memo that was to be provided to the Secretary to authorize the requested access. Lowe provided the draft to Irish who shared it with Ash for review. Lowe believes that once final, Irish was going to facilitate transmittal to the Secretary; however, Lowe is not aware that the Memo got signed.

Lowe had no discussions on this topic on Friday, March 28.

Lowe advised that he has told several close friends about what happened but no one else outside of the Department. Lowe noted that he does not possess a copy of the Memo and has not shared it with anyone outside of the Department.

Ash said he first learned of Holmes' and Trampe's request for systems access in early March when Hassen verbally told him that he, Holmes and Trampe needed access to various network systems. A meeting over Teams soon followed this conversation that included Ash, Bednar, Irish, Hassen, Holmes and Trampe and potentially others. Hassen advised at this meeting that they were "behind" and needed the various network systems access. Hassen and Holmes explained that one of the President's Executive Orders authorized them to have all the access they were requesting.

Ash advised that after this meeting, he had a minimal role in addressing the requirements identified in the above meeting. Ash said that Bednar had the immediate role to research and determine if the requested access could be provided to FPPS and how that could be accomplished. In addition, Bednar took the lead on creating a risk assessment memorandum to discuss the various risks associated with providing Holmes and Trampe the requested access. Ash, others within the OCIO and Irish contributed to the memorandum, in addition to Bednar and her team.

The memorandum ended up as a 16-page document. According to Ash, after the risk assessment memorandum was signed, Holmes and Trampe were granted certain rights within FPPS. It was not until a March 27 meeting involving Holmes and Trampe that Ash learned they were seeking access elevated beyond what had been provided.

According to Ash, he attended the March 27 meeting under the belief that Matragrano had requested it to discuss Holmes' and Trampe's request to have the ability to create, suspend, and delete email accounts. Attending this meeting, as Ash could recall, in addition to Ash, Holmes and Trampe were Lowe, Bednar, Irish, Jennifer Ackerman, Cindy Piper, Martha Eichenbaum, Matragrano and Lawson. Ash noted that Holmes and Trampe were late to the meeting and the meeting ended after about 20 minutes.

The meeting was led by Irish with much of the meeting consumed by Irish and Holmes discussing and debating the Executive Order noted previously, statutes that impacted the requests for access and the risks associated with their requests. Matragrano also provided an explanation of how the systems work and the requirement for a human resources action before an email account can be created or other actions taken.

Ash's impression of the meeting was that everyone on the call was seeking ways to meet Holmes' and Trampe's needs but Holmes and Trampe were not accepting the guidance. Ash perceived that Holmes and Trampe were not satisfied with the information provided by Irish.

Subsequent to the above meeting, a second meeting was held that did not include Holmes and Trampe. At this meeting, based on Ash's recollection, were Ash, Lowe, Bednar, Irish, June Hartley and Robyn Rees. This meeting was held to discuss what had been discussed at the earlier meeting and develop a path forward.

Ash testified that, on Irish's advice, Ash could provide the access being requested only if the Secretary so authorized. Irish suggested that a memorandum be drafted to apprise the Secretary of the risks in granting such access so that the Secretary could grant or deny the request.

Lowe took the lead on crafting the Memo by taking the prior 16-page risk assessment memorandum and distilling it down to a 1 or 2-page document. Ash believes that Lowe worked with Irish on the Memo.

Ash was on leave after 1pm on March 27 but recalls receiving and reviewing the Memo around 4pm on his mobile phone. On the email was Irish and Lowe and others may also have received the Memo but Ash does not recall. Ash does recall responding via email that he had no concerns with the Memo.

Ash's understanding was that Irish would then discuss the Memo further within the Office of the Solicitor before the Memo would be moved forward for transmittal to the Secretary. Ash did not receive any further information on whether the Memo had been reviewed or approved by the Secretary. Ash recalls a Teams chat on March 28 in which someone requested a status update and his recollection is that Irish stated that he had nothing to share.

Ash stated that he did not share any of the information concerning this matter with anyone outside the Department. Ash also stated that he did not share the Memo with anyone outside of the Department.

Bednar advised that she learned several weeks ago, she could not be more specific than that, of the request from Holmes and Trampe for access to FPPS. She said she received this information from Lawson, Ackerman and Rees either on a call or via email.

Bednar noted that in her role, she cannot provide FPPS access nor is she a decision-maker with respect to who may be granted access. Rather, IBC only manages FPPS on behalf of their 53 client agencies.

Bednar advised that the request for the access being sought was unusual as Holmes and Trampe already had viewing access within FPPS. Viewing access provided them the ability to see any actions processed within FPPS.

In early March, Bednar discussed the request with Holmes and understand from this discussion that Holmes wanted the ability to initiate personnel actions in FPPS across the Department. Such a role did not exist within FPPS; accordingly, Bednar had to research whether the role could exist (what Bednar called a "requesting office" role and generally is the role that a supervisor has within FPPS) and the risk associated with creating such a role. Bednar testified that OCIO recommended that she draft a risk assessment memorandum to identify these issues.

In addition to Bednar, others in IBC, OCIO and CISO offices and OHC contributed to the risk assessment memorandum. The memorandum was researched and drafted in mid-March and sometime thereafter Holmes and Trampe were provided the requesting office role.

On March 25, 2025, Don Garcia, an employee on Bednar's team, was providing FPPS training to Holmes and Trampe. During the training, Garcia relayed to Bednar that Holmes and Trampe asked about further access within the system (what Bednar referred to as the "servicing personnel office (SPO)" role). The SPO role allows someone to approve a personnel action requested by someone with the requesting office role. Bednar cannot recall if she discussed this with Holmes and Trampe prior to March 27, 2025 but does believe there were internal calls to discuss the matter prior to March 27.

On March 27, 2025, a call occurred that was attended by Bednar, Ash, Lowe, Irish, Harold Watkins, Office of Human Capital personnel, Quan Boatman, Steve Brand and O'Neil to discuss the request for SPO access. Bednar does not recall participating in a meeting on March 27, 2025 that included Holmes, Trampe and some of these other individuals.

At the March 27 meeting recalled by Bednar, the participants discussed the issues associated with providing Holmes and Trampe SPO access. Usually, one person does not have requesting office and SPO roles for the same organization as was requested here. It was determined that, because Hassen also would be provided the similar access, a memorandum would need to be provided to the Secretary for approval.

Bednar advised that she began drafting an updated risk assessment memorandum to which others on the call provided input. Bednar believes that the Office of the Solicitor worked separately on a decision memorandum for the Secretary and that her risk assessment memorandum would be an attachment. It was her understanding from the March 27 meeting that the Office of the Solicitor would facilitate transmittal to the Secretary.

As of March 28, 2025, Bednar believed the decision memorandum was being crafted but she did not see it or know what happened with it. Bednar denied discussing this matter with anyone outside of the Department. Bednar also denied providing the Memo to anyone outside of the Department.

I asked Bednar if she participated in a call with Trampe on which Trampe requested contact information for an employee on Bednar's team and, if so, whether Bednar refused this request. Bednar stated that on March 28, she participated on a call with Trampe, Hassen, Gavin Kliger with the Department of the Treasury, and IBC employees Boatman, O'Neil, Doug Pokorney and Christine Zertuche-Rocha (and possibly one or two individuals).

During this call, Kliger advised that he wished to speak with Robert Crest, an employee on Bednar's team who is the system owner for FPPS. Bednar asked that Kliger proceed through her since she is Crest's supervisor; however, Kliger noted that he wished to go directly to Crest. At that point, Bednar advised that she sought to provide Kliger with Crest's contact information. Bednar stated that she did not receive a request from Trampe for Crest's contact information.

Irish advised that he first learned of Holmes' and Trampe's request for elevated systems access about three to four weeks ago from Ackerman. Irish recommended further engagement on the matter with Matragrano, Bednar and OCIO. After this engagement, he understood that Holmes and Trampe had been provided read access in FPPS.

Sometime later, Irish and officials with OCIO, IBC and OHC met to discuss how Holmes and Trampe could be provided further access within FPPS. There was discussion/work done to assess the risks of granting such access and appropriate mitigation measures. After this review, Irish understood that Holmes and Trampe would be provided the ability to initiate an action in FPPS but not to approve an action.

Early on in the last full week of March 2025, Irish learned – he does not recall how he learned – that Holmes and Trampe wanted access to all capabilities in FPPS. This led to a call on March 27, 2025 involving himself, Holmes, Trampe, Ash, Lowe, Matragrano, Eichenbaum, Ackerman, and possibly others.

The meeting involved discussion on Holmes' and Trampe's request to have the ability to create, suspend and delete users email accounts. There were explanations of the security risks in providing a person with this access and questions were asked regarding the precise need associated with this access. There also was discussion about the FPPS access and how Holmes' and Trampe's needs could be met through alternative means.

Irish noted that he had a substantial role in the meeting. He is not an information technology or human resources expert and so, he helped facilitate the discussion on those topics. There also was discussion regarding the Executive Order that Holmes and Trampe noted authorized them to

have the access being sought. Irish advised that the Executive Order applied to established DOGE teams within an agency and no such team had been established at the Department. Additionally, Irish expressed his view that the Executive Order cannot supersede existing statutes, such as the Privacy Act.

Irish stated that the meeting ended abruptly and that Holmes and Trampe clearly wanted to have the accesses as they had requested.

A subsequent meeting was held with many of the same participants, less Holmes and Trampe. The participants broadly discussed security risk levels, how to meet Holmes and Trampe's requirements and whether more training under the Privacy Act would help facilitate providing them the access they desired. It was decided that they would take an existing risk assessment memorandum and turn it into a shorter document for the Secretary so that he could grant the requested access. The Secretary's input was desired as the request was unprecedented and beyond Ash's authority to approve. In the late morning of March 27, 2025, Irish stated that he spoke with Tim Murphy and Greg Zerzan about the approach that had been discussed in the second meeting. According to Irish, Zerzan concurred with the approach.

According to Ash, OCIO developed a draft which Irish refined to make "less aggressive." Irish stated that towards the end of the day on March 27, 2025, he shared the Memo with Zerzan and Murphy and they each provided input. Irish left work around 5pm to attend a family event but understood that Zerzan would socialize the Memo with Holmes, Trampe and Hassen that evening. Irish communicated with Zerzan later that evening and further learned from Zerzan that, although Holmes and Trampe had noted previously that they needed the requested access no later than Friday, the actual deadline was the following Monday.

Irish did not discuss the Memo with Zerzan, Holmes, Trampe or Hassen on March 28 and continued to await word from Zerzan about whether the Memo would be provided to the Secretary or perhaps needed revisions. There was email traffic, however, from OCIO, IBC and perhaps other officials – Irish only specifically recalled O'Neil being on the emails – on March 28 about concerns with repercussions if the requested access was not provided that day. Irish provided assurances that the matter was being addressed and that they should not provide the access until they had been advised of approval. Irish recommended that they may wish to set up the training previously discussed for Holmes and Trampe to demonstrate the matter was being handled by them. Irish also added that, shortly prior to being placed on administrative leave, he verbally briefed Jackie Jones on the situation and suggested that a weekly call be established to address this and other cross-cutting matters.

Irish denied discussing this matter with anyone outside of the Department. Irish denied providing access to the Memo to anyone outside of the Department.