



OFFICE OF  
**INSPECTOR GENERAL**  
U.S. DEPARTMENT OF THE INTERIOR

REPORT OF INVESTIGATION

Case Title CAPE CANAVERAL NATIONAL SEASHORE	Case Number OI-VA-11-0371-I
Reporting Office Herndon, VA	Report Date November 13, 2012
Report Subject Report of Investigation	

SYNOPSIS

On April 22, 2011, the U.S. Department of the Interior (DOI), Office of Inspector General (OIG) received an e-mail complaint via the OIG Hotline from Candace Carter, Biological Science Technician, Canaveral National Seashore (Canaveral), Apollo District, National Park Service (NPS). The complaint alleged procurement fraud on behalf of [REDACTED], [REDACTED], [REDACTED] Canaveral, NPS, and [REDACTED], [REDACTED] Canaveral, NPS. Specifically, the complaint alleged that construction of a building was done through split purchases and piecemeal hiring of select construction contractors, including two in covered relationships with [REDACTED] and [REDACTED]. The complainant identified two contractors as [REDACTED], [REDACTED] of Kristie's Painting, and [REDACTED], [REDACTED] of [REDACTED] Woodworking.

This investigation uncovered evidence of Federal Acquisition Regulation (FAR), DOI policy, and ethical violations in that [REDACTED] circumvented procurement regulations by splitting requirements of specific projects, also known as making "split purchases," in order to hire vendors directly and without competition. One of the vendors was identified as [REDACTED], [REDACTED] and [REDACTED] company, which [REDACTED] hired directly. Moreover, [REDACTED] failed to maintain proper records concerning the selection process for these vendors.

Additionally, this investigation uncovered management issues at the park, which could be traced to Superintendent Myrna Palfrey's inability to effectively supervise her employees as well as her lack of candor when being interviewed by the OIG. The OIG identified an overall sense of dissention between coworkers.

Reporting Official/Title [REDACTED], Special Agent	Signature
Approving Official/Title Peter Kim, Special Agent in Charge	Signature
Authentication Number: 9CB0BCC8131B99377FF09C91D304C09D	

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OI-002 (04/10 rev. 2)

### BACKGROUND

Applicable FAR and Charge Card Policies are:

FAR 13.003(c)(2):

- Do not break down requirements aggregating more than the simplified acquisition threshold...or the micro-purchase threshold into several purchases that are less than the applicable threshold merely to – (i) Permit use of simplified acquisition procedures; or (ii) Avoid any requirements that applies to purchases exceeding the micro-purchase threshold.

Department of the Interior Integrated Charge Card Policy, 3.5 Purchase Limits:

- For non-warranted cardholders, the maximum single-purchase spending limit is as follows: \$3,000 for supplies, \$2,500 for services, and \$2,000 for construction. Transactions must not be split into smaller purchases so that each order falls within the single-purchase limit. Purposely splitting a purchase may result in the cancellation of purchasing authority and disciplinary action. Repeated purchases over short periods of time may be considered splitting requirements.

Department of the Interior Integrated Charge Card Policy, 1.4.5.4, Managers, Supervisors and Approving Officials must:

- Review, sign and date cardholder statements of account and supporting documentation within 30 calendar days of the statement date. This signature is an indication of the supervisors' approval of all transactions as needed to support the office mission.
- Make sure employees are correctly trained in the proper use of the charge card.
- Watch spending patterns and vendor sources.

The Standard of Ethical Conduct for Employees of the Executive Branch states that employees shall act impartially and not give preferential treatment to any private organization or individual, and that employees shall endeavor to avoid any actions creating the appearance that they are violating the law or the ethical standards.

### DETAILS OF INVESTIGATION

The OIG launched this investigation pursuant to the receipt of an e-mail complaint via the OIG Hotline, alleging that [REDACTED], [REDACTED], Canaveral, NPS, and [REDACTED], [REDACTED], Canaveral, NPS, facilitated the construction of a building through split purchases and piecemeal hiring of select construction contractors, including two in covered relationships with [REDACTED] and [REDACTED]. The complainant identified two contractors as [REDACTED] brother, [REDACTED] of Kristie's Painting, and [REDACTED] brother, [REDACTED] of [REDACTED] Woodworking. The complaint also alleged that Superintendent Myrna Palfrey provided preferential treatment of [REDACTED] and [REDACTED], [REDACTED] [REDACTED] and [REDACTED], resulting in a mismanaged and stressful working environment (**Attachment 1**).

During the course of this investigation, OIG agents visited Canaveral, collected and reviewed

numerous documents, and conducted interviews with relevant personnel. A review of construction and maintenance projects was conducted to incorporate more than just the project mentioned in the original complaint. This investigation uncovered procurement and ethical violations, as well as an overall sense of mismanagement at the park.

### *Procurement Violations*

█ was interviewed by the OIG and was advised of the complaints against █ (Attachment 2). █ was asked to provide investigators with █ overall understanding of the contracting process as governed by the FAR. More specifically, █ was asked what the thresholds were for micro-purchases. After some consideration, █ said that █ believed the thresholds were \$2,500 for supplies, \$2,000 for construction, and \$3,000 for services. After some consideration, █ corrected █ response, stating that it was actually \$3,000 for supplies and \$2,500 for services. █ was asked if he has ever taken procurement training, and █ advised that █ had. █ said █ last took procurement training in March 2011.

*Agent's Note: The FAR defines micro-purchase as an acquisition of supplies or services using simplified acquisition procedures. It further defines the threshold as \$3,000, with exceptions subject to the Davis-Bacon Act for construction at \$2,000, and the Service Contract Act for the acquisition of services at \$2,500.*

█ was asked if █ understood what constituted a split purchase. █ said a split purchase was when an individual with purchase authority uses more than one credit card to directly purchase an item or a service that would otherwise be above the micro-purchase threshold. █ said █ knew that was forbidden practice.

█ was then shown documentation that highlighted several projects at Canaveral that █ had overseen. These projects included construction of a temporary visitor center; the repairing of a boardwalk; repairs made on the Shultz House; repairs to a cistern roof; construction of the interpretation pavilion; construction of a hazardous materials building; and various other repairs done at various locations throughout the park. It was explained to █ that all these projects seemed to be done via split purchases, in what appeared to be █ attempt to circumvent the FAR.

█ reviewed the documentation for each project with investigators. In regard to the hazardous materials building, it was explained to █ that the project called for the construction of a storage facility located on park grounds, which wound up costing approximately \$18,000 once it was completed (Attachment 3). Instead of following the FAR and putting a contract out for bids, █ decided to do the project in-house, and contacted vendors directly, breaking up the various stages of the construction so that, in most instances, each stage came in underneath the micro-purchase threshold. █ agreed that this was how █ had done it, though █ failed to see the problem with it. When it was explained to █ that he had circumvented the FAR, █ said █ hadn't been aware of it at the time, because no one ever told █ he couldn't work a project in such a fashion. █ said █ didn't consider this to be an example of a split purchase.

*Agent's Note: As stated in the FAR, under 13.003 (c)(2), "Do not break down requirements aggregating more than the simplified acquisition threshold (or for commercial items, the threshold in Subpart 13.5) or the micro-purchase threshold into several purchases that are less than the applicable threshold merely to—(i) Permit use of simplified acquisition procedures; or (ii) Avoid any requirement that applies to purchases exceeding the micro-purchase threshold."*

Specifically, [REDACTED] was shown how the various stages of the construction were broken down into even smaller stages, whereas, for example, three different vendors were brought on to build the roof, each vendor receiving under \$2,000 for their work, though cumulative the cost was more than \$2,000. Again, [REDACTED] said [REDACTED] failed to see why this was a problem. Moreover, it was brought to [REDACTED] attention that one of the charges attributed to the cost of the construction of the hazardous materials building was \$871 for bathroom and cleaning supplies, while it was noted that the hazardous materials building has no bathroom. [REDACTED] had no explanation for why this might have been charged to this specific project.

[REDACTED] was asked if [REDACTED] was required to receive three different bids from various vendors before hiring a specific vendor, in order to assure the park was getting the best price. [REDACTED] said [REDACTED] believed this was the case. [REDACTED] was asked if [REDACTED] followed this practice, and [REDACTED] said yes. [REDACTED] was asked if [REDACTED] could provide documentation to show that, in various instances, [REDACTED] had received three quotes prior to selecting specific vendors. [REDACTED] said [REDACTED] did not maintain any documentation on these quotes, and that they were mostly verbal quotes or, in other instances, [REDACTED] would look up pricing on the internet and come to a determination that way. [REDACTED] was asked if there was any rule or regulation that required [REDACTED] to maintain documentation on these quotes, and [REDACTED] said [REDACTED] did not know, though [REDACTED] didn't believe [REDACTED] had to maintain documentation if the quotes were verbal. When asked why [REDACTED] thought this process should be treated differently just because quotes were verbal, [REDACTED] said [REDACTED] did not know.

*Agent's Note: According to the FAR, Section 13.106-3(b)(1), "The contracting office should establish and maintain records of oral price quotations in order to reflect clearly the propriety of placing the order at the price paid with the supplier concerned. In most cases, this will consist merely of showing the names of the suppliers contacted and the prices and other terms and conditions quoted by each."*

### **Ethics Violations**

[REDACTED] was asked about the hiring of Kristie's Painting, a company owned by [REDACTED] [REDACTED] and [REDACTED]. Kristie's Painting had been hired to do various projects at the park (**Attachment 4**). [REDACTED] was asked if [REDACTED] had gotten three quotes from vendors before selecting Kristie's Painting for the job, and [REDACTED] said [REDACTED] couldn't remember. [REDACTED] was reminded that [REDACTED] had previously asserted that he believed it was required of [REDACTED] to get three quotes before selecting a vendor, so if [REDACTED] couldn't recall if [REDACTED] had done so on this occasion, that would suggest [REDACTED] did not always follow the rules. [REDACTED] then said [REDACTED] was unsure whether or not [REDACTED] was required to get three quotes before selecting a vendor. Regardless, [REDACTED] asserted that [REDACTED] believed, in this instance, [REDACTED] had gotten two other quotes, but had decided to go with Kristie's Painting in the end. When asked if [REDACTED] considered this to be a conflict of interest, [REDACTED] said no, that [REDACTED] didn't think this constituted a conflict of interest at all. In fact, [REDACTED] stated that [REDACTED] thought it would be perceived as unfair if [REDACTED] didn't give Kristie's Painting the job, which is why [REDACTED] did. Again, [REDACTED] was asked if [REDACTED] saw anything wrong with this line of thinking, and [REDACTED] said [REDACTED] did not. When asked why [REDACTED] hadn't recused [REDACTED] from this selection, [REDACTED] said [REDACTED] didn't think it was necessary, then proceeded to ask the investigators if [REDACTED] should have.

It was pointed out to [REDACTED] that [REDACTED], brother of [REDACTED], [REDACTED], NPS, had also been awarded a number of jobs at the park (**Attachment 5**). [REDACTED] was asked if [REDACTED] had received three different quotes prior to selecting [REDACTED] company, [REDACTED] Woodworking, for the jobs. [REDACTED] said [REDACTED] did not know if [REDACTED] got three different quotes prior to selecting [REDACTED] company.

█████ was asked if █████ had ever received any money from █████, or any other vendor, in return for hiring them at the park, and █████ said no. █████ was asked if █████ had ever told █████, or any other vendor, proprietary information submitted by other potential vendors in order to underbid them, and █████ said no.

█████ was asked about the DI-1 forms (i.e., DOI requisition forms) that were filled out for specific projects. Specifically, █████ was asked who would have to sign the DI-1 forms that █████ filled out. █████ said █████ could sign █████ own forms, and wasn't aware of any regulation that said someone else had to sign one of █████ own forms.

In conclusion, █████ stated that █████ had been unaware that █████ practices violated the FAR, even though █████ continued to take procurement training. Moreover, █████ said █████ had been unaware that some of what █████ had done, such as the hiring of Kristie's Painting, could be perceived as an ethical violation and a conflict of interest. █████ said no one had ever told █████ █████ couldn't do these things. It was pointed out to █████ that █████ had taken annual procurement training, which stipulates these regulations in the training.

█████ said that this was the first time █████ had ever been told of the allegations against █████ which was why █████ had been reluctant to speak with investigators earlier, and which was why █████ was unprepared for some of the questions asked of █████. It was explained to █████ that this was not in fact true, and █████ was then shown a written copy of █████ original interview with the OIG where these same issues were discussed. █████ said nothing further.

### *Management Issues*

An interview was conducted with Superintendent Myrna Palfrey concerning these allegations (**Attachment 6**). Palfrey was asked if she had told anyone else about the OIG's impending visit to the park, since the OIG had asked her not to say anything. Palfrey said she had not told anyone. Palfrey was then asked about █████. She said she did not have a personal relationship with █████ and that they "don't hang out at home." She said she was bothered by the OIG asking if she was friends with █████. She said she was friendly with █████ █████ █████.

*Agent's Note: Later that evening, █████ personal vehicle was observed outside Palfrey's home. The following afternoon, Palfrey admitted that both █████ and █████ had been at her house discussing the OIG investigation.*

In an effort to investigate Palfrey's alleged preferential treatment of █████ OIG agents looked into █████ promotion to █████. Palfrey said █████ was the best candidate on a list of applicants. Some of the applicants eventually dropped out, leaving █████ and another NPS employee, █████, on the list. Palfrey said █████ was ranked seventh and █████ was ranked first. When it came time to do the interviews for the position, Palfrey said she only interviewed █████ and █████. When asked why she would interview █████ as opposed to the second- and third-ranking candidates, Palfrey said it was because she didn't want █████ to complain that █████ hadn't been treated fairly. Palfrey said █████ was much more qualified than █████ and she knew that prior to the interviews. She said she had no intention of selecting █████. When asked why she didn't interview the top two candidates behind █████ Palfrey said they had bad references and she discounted them. Palfrey added that she wasn't required to interview all the candidates, so she just chose to interview █████ and █████.

Concerning the procurement issues at the park, Palfrey advised that she had a contracting background,

and had held a warrant for approximately six years when she functioned as an administrative officer. Palfrey was shown documentation where it appeared [REDACTED] had split purchases to vendors in order to complete specific projects, instead of putting out a contract and collecting bids from potential contractors. Palfrey was asked if she knew what split-purchasing was, and she said, "Absolutely. It's illegal." Palfrey said these projects had happened prior to her appointment as superintendent. Palfrey said she had reviewed the third party drafts where purchases were being split to keep them under the threshold, and that these jobs went to relatives of park employees. She admitted that it did not look good.

Palfrey said that after reviewing these third party drafts, she made a rule that said all family members of employees must bid on projects regardless of the threshold. When asked what caused her to specifically make that rule, Palfrey said she could not remember.

Palfrey reviewed the documentation and admitted it "appears" as though [REDACTED] was splitting purchases. Nonetheless, Palfrey said it was all "hearsay." Palfrey was reminded that NPS agents had been down to speak with her about the split-purchase issue back in May 2011, which was when she said it had first been brought to her attention. Palfrey was asked what she had done to rectify potential procurement problems since the NPS agents' May 2011 visit to look into the matter, and Palfrey said she hadn't done anything. When asked if she ever got an explanation from [REDACTED] about why it appeared [REDACTED] was splitting purchases, Palfrey said she never asked [REDACTED] about it.

Among the paperwork provided by the complainants to the OIG were the criminal records of two employees at the park, who also happened to be relatives of park employees. Palfrey was asked about the hiring process at the park, particularly in regard to the Student Temporary Employment Program (STEP) and the Student Career Experience Program (SCEP). Specifically, Palfrey was asked about the hiring of [REDACTED] through the SCEP (Attachment 7). Palfrey acknowledged that she knew [REDACTED] was the [REDACTED] of [REDACTED]. Palfrey advised that [REDACTED] had been offered the position after a previous candidate turned it down. Palfrey said [REDACTED] was responsible for submitting [REDACTED] background information for vetting, to both an NPS office and the Office of Personnel Management (OPM). After [REDACTED] had started working, Palfrey said she learned via a complaint that [REDACTED] OPM background investigation had never been completed. Palfrey said she believed [REDACTED] background had been removed from the mail and never made it to OPM.

Palfrey said she never looked into [REDACTED] background, to include whether or not [REDACTED] had a criminal history. At the time of this interview, Palfrey said she was aware that [REDACTED] had been [REDACTED] for [REDACTED] in the past, but that she did not have any concern about having [REDACTED] work at the park in [REDACTED] current capacity, which would be in a cashier's role handling money.

Palfrey was also asked about the hiring of [REDACTED]. Palfrey said [REDACTED] was the [REDACTED] of Palfrey's [REDACTED], [REDACTED], and that [REDACTED] had been at the park as a maintenance employee under the STEP for approximately five years. A position came open for a network person, and when Palfrey came on board as the superintendent, she thought [REDACTED] would be a good fit. Palfrey said she converted [REDACTED] from the STEP to the SCEP in order to fit [REDACTED] into the network position. Palfrey said she had the authority to do it, and that she found [REDACTED] to be an excellent employee. Palfrey advised that she had not known of [REDACTED] criminal record at the time of [REDACTED] transfer to the SCEP and the network position. Palfrey heard via a complaint that individuals had been hired with criminal histories but Palfrey said she did not "move a finger" to find out the details of what that meant.

At the time of this interview, Palfrey said she was unaware of [REDACTED] criminal background. Palfrey

said that if she had known about it at one point, she could no longer remember. Palfrey was shown documentation detailing [REDACTED] background, which detailed [REDACTED] (Attachment 8). Palfrey said she had not been aware of those charges.

Palfrey was asked if she would have hired [REDACTED] and [REDACTED] had she previously known of their backgrounds, and Palfrey replied, "That's a good question." Eventually, Palfrey said that she wouldn't have hired [REDACTED]. In regards to [REDACTED] Palfrey said, "Maybe," then added that she was comfortable with [REDACTED] in a position handling park money nonetheless.

During the course of this investigation, the OIG received a number of documents from complainants, to include monthly statements for Palfrey's government cell phone. A review of these statements showed an inordinate amount of billable calls (Attachment 9). Palfrey was asked about her understanding of the policy on the use of government cell phones. Palfrey said the government cell phones were supposed to be used strictly for work, with the occasional personal call being permissible. Palfrey added that she was not very strict in enforcing that rule. Palfrey was then shown a chart of her employees' monthly government cell phone bills. It was pointed out to Palfrey that the majority of the bills were around \$30 a month. Palfrey acknowledged that the numbers seemed reasonable, and agreed that a hypothetical bill of \$200 would be excessive. Palfrey was then shown three sequential monthly statements from her own government cell phone, where the three monthly billings showed an amount over \$800. Palfrey acknowledged that she had used the phone for personal use and that there was no excuse for her misuse of the phone. Palfrey said she would be willing to pay back the money she owed the government, and added, "I guess write me up or something." Palfrey added that she would have liked to have been told that she kept going over her minutes so that she would not have accrued such high bills.

At the conclusion of the interview, Palfrey was once again asked if she had mentioned to anyone that the OIG would be visiting the park, since it appeared to OIG agents that the park employees had not been surprised by the visit. This time, Palfrey admitted that she had told Canaveral [REDACTED] [REDACTED] that the OIG was going to come to the park, even though the OIG had told her not to tell anyone.

In closing, Palfrey said the complaints at the park were racially based, and that she, [REDACTED] [REDACTED] [REDACTED] were being persecuted because they were minorities.

A similar comment was made by [REDACTED] [REDACTED] who said [REDACTED] had been expecting a visit from the OIG because there had been an "influx of complaints" from a "small group of white Caucasians." [REDACTED] added, "It's a racially motivated issue and I'm tired of it."

[REDACTED] was also questioned about the appearance of nepotistic hiring practices at the park (Attachment 10). Specifically, [REDACTED] was asked about the hiring of [REDACTED], [REDACTED] [REDACTED] said [REDACTED] knew the position was open and [REDACTED] mentioned it to [REDACTED], who filled out an application. [REDACTED] said [REDACTED] submitted the paperwork to OPM but just recently found out that OPM never received the paperwork. [REDACTED] said [REDACTED], Procurement, NPS, had taken the envelope containing [REDACTED] paperwork out of the mailbox after [REDACTED] had put it in. [REDACTED] said [REDACTED] saw [REDACTED] walk past [REDACTED] office clutching the envelope to [REDACTED] chest. [REDACTED] was asked if [REDACTED] was positive it was the envelope containing [REDACTED] paperwork and [REDACTED] said yes, that [REDACTED] recognized the brown envelope and the "big wide" tape [REDACTED] used to seal the envelope. [REDACTED] was asked why [REDACTED] would have assumed the envelope would have been mailed if [REDACTED] seen [REDACTED] take it out of the mailbox. [REDACTED] answered, "[I]t's hard for me to believe somebody would do something like that." Once again, [REDACTED] said unequivocally that [REDACTED] identified the envelope in [REDACTED]

possession as [redacted] paperwork, that [redacted] recognized it by its color and the tape [redacted] used to seal it. Despite this, [redacted] said [redacted] did not confront [redacted] about it, nor did [redacted] check the mailbox to see if the envelope was still there. Even though [redacted] said [redacted] had no doubt that the envelope contained [redacted] paperwork, [redacted] didn't confront [redacted] because [redacted] "just couldn't believe that they would just go in the mailbox and take something like that out."

[redacted] was told [redacted] answers did not make sense. [redacted] was asked if perhaps [redacted] forgotten to mail the paperwork and was now trying to cover up for [redacted] mistake, to which [redacted] said that was not the case.

[redacted] was asked if [redacted] was aware that [redacted] had a criminal background. At first [redacted] said no, but then added that [redacted] had been arrested when [redacted] was a teenager for [redacted]. [redacted] said [redacted] knew about it because [redacted] had looked up [redacted] record on the internet. When asked why [redacted] had looked up [redacted] arrest history, [redacted] said, "Because I always look [redacted] stuff up for [redacted] and then [redacted] said later [redacted] looked up [redacted] criminal history to see why it was taking so long to get [redacted] cleared with OPM.

*Agent's Note:* In a subsequent interview, [redacted] told OIG agents that [redacted] had never been arrested, though when [redacted] was underage, [redacted] had been detained by police for [redacted].

Again, [redacted] was asked why [redacted] believed OPM had the envelope [redacted] said [redacted] saw [redacted] take from the mailbox, and [redacted] again said [redacted] couldn't believe [redacted] would do something like that.

The initial interview with [redacted] was completed prematurely after [redacted] refused to provide the OIG with requested documentation relating to the [redacted] direct deposit information and OPM records [redacted] had in [redacted] office. [redacted], [redacted], then interrupted the interview and said [redacted] and [redacted] would no longer talk with the OIG without an attorney. Subsequently, both [redacted] and [redacted] were re-interviewed after being assured there would be no criminal prosecution, and their interviews were compelled by the OIG.

During the course of this investigation, several attempts were made to interview NPS [redacted] [redacted], who was also listed in the complaint; however, due to [redacted] being on [redacted], these attempts were unsuccessful.

**SUBJECT(S)**

- [redacted], [redacted], Canaveral, NPS
- Myrna Palfrey, Superintendent, Canaveral, NPS
- [redacted], [redacted], Canaveral, NPS
- [redacted], [redacted], Canaveral, NPS

**DISPOSITION**

This investigation uncovered evidence that [redacted] circumvented procurement regulations by splitting requirements of specific projects, also known as making "split purchases," in order to hire vendors directly and without competition. One of the vendors was identified [redacted] [redacted] and [redacted] [redacted] company, which [redacted] hired directly without seeing the need for recusal. Moreover, [redacted]



failed to maintain proper records concerning the selection process for these vendors.

Additionally, this investigation uncovered management issues at the park, which could be traced to Superintendent Myrna Palfrey's inability to effectively supervise her employees as well as her lack of candor when being interviewed by the OIG. The OIG identified an overall sense of dissention between coworkers.

This investigation was declined for criminal prosecution by [REDACTED], Assistant U.S. Attorney, [REDACTED]. The results of this investigation will be sent to the appropriate bureau. No further investigative action is necessary.

### ATTACHMENTS

1. Investigative Activity Report, Interview of Candace Carter and [REDACTED] [REDACTED] dated October 4, 2011; initial complaint document
2. Investigative Activity Report, Interviews of [REDACTED], dated October 5, 2011 and July 24, 2012
3. Documentation detailing construction of the hazardous materials building
4. Documentation showing Kristie's Painting hired to do work at the park
5. Documentation showing [REDACTED] Woodworking hired to do work at the park
6. Investigative Activity Report, Interview of Myrna Palfrey, dated October 5, 2011
7. Investigative Activity Report, Interview of [REDACTED], dated October 2, 2011; [REDACTED] criminal history
8. [REDACTED] criminal history
9. Palfrey's phone bills
10. Investigative Activity Report, Interviews of [REDACTED], dated October 5, 2011 and July 24, 2012