



Inspector General

2025-0006-INVI-P — Contracting Violations

Suspected Violations of the Architect of the Capitol (AOC) “Contracting Manual” Policy. **Substantiated**

In August 2023, the Architect of the Capitol (AOC) Office of Inspector General (OIG) initiated a proactive investigation (2023-0004-INVPRO-P) to review AOC contracts under \$1 million to identify potential indicators of fraud, associated persons, or other red flags indicating illegal activity.

That review identified potential indicators of fraud during the market research phase of the contract award. The OIG initiated a spin-off investigation to further review the matter.

The investigation found that prior to 2018, an AOC jurisdiction purchased chemical compounds used to break down kitchen drain grease directly from a large business. AOC then awarded contracts in 2018, 2020, and 2024 to a small business to service the biological drain (bio-drain) pumps on site once a month after being advised they could no longer use the large business. The AOC spent \$338,014.46 to date on the contracts awarded to this small business vendor.

Evidence found the small business vendor acted as a passthrough for the original large business. The small company’s owner and sole employee provided the initial quote to the AOC and followed up on invoice payments, but the original large business continued to perform the work.

For the 2018 contract, the AOC employee, as the COR, submitted vendors to solicit for quotes. Apart from the identified small business vendor, none of the vendors submitted even performed kitchen grease removal work.

For the 2020 contract, the AOC employee received a list of vendor names directly from the original large business’ Territory Manager, which the AOC employee then submitted to solicit for quotes. Further investigation revealed that at least two of the three vendors provided by the Territory Manager were affiliated directly with the original large business. One was identified as an associated corporation and the second—the small business vendor, which was ultimately awarded the contract—was owned by the Territory Manager’s daughter.

AOC contracting policy requires that AOC jurisdictions submit market research efforts with requisitions. The policy’s list of accepted market research methods does not include contacting vendors apart from a formal Request for Information from the Contracting Officer. The AOC employee submitted vendors that were not independently competing and failed to conduct adequate market research as required. The OIG did not find evidence of any personal relationship between the AOC employee and the contractors.

For the 2024 contract, the AOC employee had the same work awarded but under a sole-source contract and to the same small business vendor. The sole-source justification stated that the



company offered a unique product that kept drains from clogging with grease. Open-source research and contracts in other AOC jurisdictions indicated that numerous eligible drain-clearing vendors were available in the Washington, D.C. area and at lower costs, which undermined the explanation that the 2024 contract needed to be sole-sourced.

The evidence obtained from the investigation was presented to the U.S. Department of Justice's Procurement Collusion Strike Force and the Office of the Attorney General for the District of Columbia. Both declined criminal prosecution citing prosecutorial discretion, resource considerations, and competing priorities.

Final Management Action: OIG's Report of Investigation was submitted to AOC management for any action deemed appropriate. On May 11, 2026, OIG was notified that the employee received a Letter of Counseling, was given direction regarding the conduct of market research, and is required to complete additional training no later than August 31, 2026. The case is closed.