



**ETHICS POLICY VIOLATION**  
**MARCH 30, 2015**  
**CASE OIG-I-2015-508**

We received an anonymous complaint that the spouse of an Amtrak executive had been convicted of embezzling funds from a non-profit organization and sentenced to incarceration and a substantial restitution -- which we later confirmed. The complaint also raised concerns that company funds could be at risk given the spouse's obligation for restitution because the Amtrak executive had decision-making authority and oversight of large company contracts. Our subsequent investigation found that the executive was not involved with or accused of any criminal wrongdoing in connection with the spouse's activities and we did not discover any evidence of improper payments on the company contracts that we reviewed. However, we found the executive failed to diligently investigate whether the executive's duties conflicted with the spouse's activities and report to the company that there may have been a conflict of interest or the appearance of a conflict of interest -- which was contrary to Amtrak's ethics policy. Consequently, management counseled the executive as to relevant policy obligations.