



DEPARTMENT OF JUSTICE | OFFICE OF THE INSPECTOR GENERAL

---

April 18, 2024

Senate Committee on the Judiciary  
Senate Committee on Homeland Security and Governmental Affairs  
Senate Committee on Appropriations of the Senate  
Senate Select Committee on Intelligence  
House Committee on the Judiciary  
House Committee on Oversight and Accountability  
House Committee on Appropriations  
House Permanent Select Committee on Intelligence

Dear Chairs and Ranking Members:

Pursuant to the Intelligence Authorization Act for Fiscal Year 2024, I am writing to memorialize the results of the Department of Justice Office of the Inspector General (OIG) "review of the actions and events, including any underlying policy direction, that served as a basis" for the Federal Bureau of Investigation (FBI) Richmond Field Office's dissemination of an internal intelligence product (Richmond Domain Perspective or DP) addressing a purported link between Racially or Ethnically Motivated Violent Extremists (RMVEs) and "Radical Traditionalist Catholic (RTC)" ideology. The explanatory statement accompanying the legislation further stated that the "review shall cover any orders or direction regarding the [DP] from any official in any field office concerning purported proximate links between any religion, any political affiliation, or the intent of this report." Consistent with this mandate, our review included any orders or direction from any official in any FBI field office concerning purported proximate links between any religion or any political affiliation, or the intent of the document. The legislation directed the OIG to submit a report to the Committees no later than 120 days after the law's enactment. Given the short time frame for our review and the status of the ongoing criminal prosecution that motivated the Richmond DP, we are reporting the results of our findings in this letter.

We understand that the FBI Inspection Division (INSD) conducted a Strategic Review of the Richmond DP in April 2023 and subsequently briefed and provided a copy of its report to a number of Committees and Members of Congress. The INSD report found that although there was no evidence of malicious intent or an improper purpose, the Richmond DP failed to adhere to analytic tradecraft standards and evinced errors in professional judgment, including that it lacked sufficient evidence or articulable support for a relationship between RMVEs and so-called RTC ideology; incorrectly conflated the subjects' religious views with their

RMVE activities, creating the appearance that the FBI had inappropriately considered religious beliefs and affiliation as a basis for conducting investigative activity; and reflected a lack of training and awareness concerning proper domestic terrorism terminology. As a result, the INSD report concluded that the employees involved in drafting, editing, and reviewing the Richmond DP failed to adhere to FBI standards. The INSD report also examined the approval process for the Richmond DP, concluding that it was insufficient, and the circumstances surrounding its removal from FBI systems following the disclosure of the document into the public domain. Based on the results of the FBI's Strategic Review, the FBI instituted a number of corrective actions, including enhancing approval requirements for intelligence products involving a sensitive investigative matter and formally admonishing the employees involved in the Richmond DP.

Given the scope of the INSD report and the language of the congressional statutory mandate to the OIG, as well as the law's 120-day reporting requirement, our limited review addressed the creation and substantive content of the Richmond DP. We obtained documents and communications concerning the DP as well as the predicated full domestic terrorism investigation that formed the basis for it. We considered concerns expressed by Members of Congress that FBI Richmond more broadly targeted Catholics who attend traditional Latin mass or hold pro-life or other conservative views in an effort to identify domestic terrorists, including by placing undercover agents or confidential human sources (CHS) in churches or interviewing clergy and other church employees.

In this letter, we first briefly summarize the domestic terrorism investigation that formed the basis for the Richmond DP. The subject of this domestic terrorism investigation was arrested in November 2022 and indicted on federal charges in June 2023. He has entered a guilty plea in federal court and sentencing is scheduled for later this year. We refer to him in this letter as Defendant A. We then discuss the creation of the Richmond DP, including testimony from the two FBI intelligence analysts who created this document (referred to as Analysts 1 and 2).

#### *The Predicated Full Domestic Terrorism Investigation of Defendant A*

The FBI opened an assessment of Defendant A in 2019, after he made online statements advocating civil war and the murder of politicians. Defendant A later was overheard making comments about political violence while purchasing several AR-type rifles, multiple high-capacity magazines, and large quantities of .223 ammunition. In August 2020, Defendant A was arrested by local police after he vandalized and slashed the tires of a parked car. Defendant A plead guilty to felony vandalism charges and agreed as part of his guilty plea to avoid contact with firearms, firearms components, and ammunition. He was sentenced to 5 years in jail, with 4 years suspended and 10 years of probation.

While in jail, Defendant A began to use increasingly violent rhetoric and indicate that he would commit violence against certain racial and religious minorities. Legally monitored jail telephone calls between Defendant A and a family member included threats of violence against pro-choice, Jewish, and LGBTQ individuals. In a letter to the same family member, Defendant A referenced his need to "build guns,

explosives, and other forms of weaponry and store them in [his] room without fear of the law finding out about it," and "make total war against the Satanic occultist government and the Zionist devil worshipping bankers who control it[.]" The letter also characterized various groups, including "Jews...[and] Zionists," as the "greatest enemies of God and the primary representatives of the devil himself in the spotlight and everyday life," urging, "Learn to spot them and how to destroy them."

Defendant A was released from jail in June 2021. Within a week of his release, contrary to the conditions of his guilty plea and sentence, he began visiting the firearms sections of various sporting goods stores. Although he did not purchase weapons, he discussed his desire to build a .308 caliber rifle and obtain ammunition for it. In addition to his prior plea agreement restrictions, as a convicted felon, both state and federal law prohibited Defendant A from purchasing or possessing a firearm. Based on Defendant A's online rhetoric, threats, and other activity, an FBI Richmond task force had been aware of Defendant A since 2019 and continued to monitor him. They identified a social media profile associated with Defendant A that included Nazi symbols and rhetoric, as well as posts advocating killing police officers, "ganging up on and beating" racial and religious minorities, conducting a mass shooting at a school for special needs children, taking up armed resistance against the government, learning how to manufacture pipe bombs, and using untraceable means to purchase supplies to manufacture 3D-printed weapons. The FBI Richmond task force also identified online purchases of firearm build kits and lock picking devices.

In early 2022, Defendant A began to attend a church (Church 1) associated with an international religious society that advocates traditional Catholic theology and liturgy but is not considered by the Vatican to be in full communion with the Catholic Church (Organization 1). In social media posts, Defendant A claimed that Church 1 was a "traditional church that isn't totally kiked [sic]," and stated that he "had to deal with the priest and some (thankfully not all) the parishioners talking about how 'Hitler bad' though thankfully they do actually acknowledge that the allies were evil." As described in more detail below, Defendant A also described himself in his social media profile as "Fascist and Catholic" and a "[radical-traditional (rad-trad)] Catholic clerical fascist." Based on his online communications, investigators determined that Defendant A was attempting to actively recruit other individuals with similar belief systems into Organization 1 and had begun talking about an attack.

The FBI task force investigation found that Defendant A "became more and more overt" in discussing plans to carry out attacks, including making comments to others at Church 1 about his intent to commit violence. Defendant A's advocacy of violence included communications with two individuals who attended Church 1 in which he made antisemitic comments, discussed the purchase of a pressure cooker, and used terminology consistent with building a pressure cooker bomb. As described in more detail below, others at Church 1 later commented that Defendant A displayed "unusual" and "concerning" behavior.

We were told that FBI task force investigators became concerned that Defendant A was recruiting others to carry out an attack, either within Church 1 or with others outside it. In the spring of 2022, FBI Richmond

placed a CHS in Church 1 to interact with Defendant A to determine if he was inciting or planning violence.<sup>1</sup> According to the FBI case agent, the only times Defendant A left the house alone were to attend events at Church 1 and it therefore provided the only potential opportunity for a CHS to establish regular contact with him. The CHS was instructed to report only information about Defendant A, not about Church 1 generally or other parishioners. Around the same time, FBI Richmond consulted the FBI's Behavioral Analysis Unit, which conducts threat assessments based on behavioral indicators to determine whether an individual is moving toward an attack on an identified target. The Behavioral Analysis Unit concluded that Defendant A's statements and behaviors were consistent with an individual willing and able to carry out an act of violence against others. Defendant A was considered FBI Richmond's highest priority domestic terrorism subject and was ranked fourth overall on the FBI's Indicators of Mobilization to Violence, which uses behavioral factors to assess an individual's likelihood to carry out acts of violence.<sup>2</sup>

FBI Richmond learned that Defendant A subsequently took additional steps indicating he was mobilizing toward an attack, including posting a photo of a mass shooter on his social media account. We were told that investigators were especially concerned with Defendant A's purchase of equipment that would allow him to lock the doors of commercial buildings, similar to what the Virginia Tech shooter did to prevent victims from escaping.<sup>3</sup> Additionally, the night before his arrest, Defendant A purchased a truck, which he said in a video posted on his social media account would be the final step in his plan for an attack. On November 12, 2022, investigators obtained a local search warrant for Defendant A's residence. Investigators recovered ammunition, a firearms build kit, a 3D printer, multiple Molotov cocktail-type improvised incendiary devices, and lockpicking devices. Although federal charges were planned, Defendant A was arrested initially on state charges that included prohibited paramilitary activity and solicitation of another to participate in a terrorist act.

After the arrest of Defendant A, the FBI case agent interviewed the priest, the choir director, and others at Church 1. According to the case agent, when he contacted Church 1 and identified himself as an FBI agent, everyone knew that he was calling about Defendant A because of Defendant A's "unusual" and "concerning" behavior and openly racist views. As described in more detail below, this led the FBI to discuss expanding

---

<sup>1</sup> Although not within the scope of this review, FBI Richmond notified the FBI's Sensitive Operations Review Committee (SORC) in May 2022 about plans to use a confidential human source (CHS) to monitor Defendant A at Church 1. The SORC is a joint Department of Justice-FBI oversight committee established to review and monitor certain aspects of FBI investigative activities, including sensitive undisclosed participation by an undercover agent or CHS in activities that potentially infringe on First Amendment rights. See FBI Domestic Investigation and Operations Guide (DIOG) § 10.2.

<sup>2</sup> As described in the INSD Report, FBI's Indicators of Mobilization to Violence (IMV) is an analysis tool that compares the behaviors of previously mobilized terrorism subjects to the behaviors of terrorism subjects who did not mobilize. Although IMV is not a predictive tool, the FBI uses it to assess terrorism subjects, determine investigative priorities, and allocate resources. Based on IMV factors, the FBI ranked Defendant A fourth overall; for context, the FBI's fifth-ranked IMV subject was the convicted shooter in the attack at Tops Friendly Market in Buffalo, New York, on May 14, 2022.

<sup>3</sup> In April 2007, a mass shooter at Virginia Tech killed 32 people, wounded many others, and killed himself. Before entering Norris Hall, where most of the shootings took place, the shooter chained shut the doors at each of the three main entrances used by students.

outreach to other area churches to help educate clergy about potential signs that an individual was mobilizing to commit violence and establish a process for reporting suspicious behavior.<sup>4</sup>

On June 22, 2023, Defendant A was indicted in federal court on one count of possessing ammunition while a convicted felon and one count of possessing destructive devices. In March 2024, he plead guilty to possessing destructive devices.<sup>5</sup> Sentencing is scheduled for September 2024.

#### *Development and Drafting of the Richmond DP*

As part of its intelligence program, the FBI conducts “domain analysis” to assess how changes in environmental variables—such as demographics, infrastructure, or technology—may result in new threats or impact the FBI’s ability to mitigate existing threats. The FBI uses domain analysis to develop and prioritize its threat strategy, alert internal decisionmakers to emerging issues, and assist with outreach to private sector and community partners. According to the FBI’s Domestic Investigations and Operations Guide (DIOG), domain analysis primarily relies on information previously collected through properly predicated assessments and investigations; the DIOG does not permit FBI employees to conduct interviews or use a CHS to obtain intelligence solely for use in a domain analysis.

Analysts 1 and 2 told the OIG that one of their duties is to conduct domain analysis and produce DPs, which is a written intelligence product intended to address environmental changes that could impact the work of FBI Richmond. The analysts described a DP as an “awareness product” that is predictive about what might happen based on an assessment of facts at the time, rather than a purely factual product. As an example, Analyst 1 stated that after Virginia legalized online sports betting, FBI Richmond produced a DP about the potential impact on transnational crime and money laundering. Both analysts emphasized that a DP is not an operational product; rather, they stated it is only meant to provide information about emerging threats to its intended audience, which in this case was FBI Richmond’s executive management team.

Analyst 1 said he conceived of the idea for the DP at issue in September 2022 based on developments in the FBI’s investigation of Defendant A.<sup>6</sup> On September 12, 2022, the FBI Richmond Intelligence Program

---

<sup>4</sup> According to the DIOG, as part of its counterterrorism efforts, the FBI routinely conducts outreach to businesses, organizations, and religious entities to establish an early-warning network to identify potential threats and provide a way to report suspicious behavior, known as tripwires. Based on its concerns that religious organizations could be targets for bad actors, FBI Richmond has conducted outreach to churches, synagogues, and mosques to alert them to what types of behavior to be aware of and how to report concerns.

<sup>5</sup> Defendant A’s guilty plea is conditional, meaning in this case that he has not waived his right to appeal the District Judge’s denial of a motion to suppress evidence obtained during the search of his residence or to raise an ineffective assistance of counsel claim that is cognizable on direct appeal.

<sup>6</sup> Both analysts were involved in or had knowledge of the Defendant A investigation. Analyst 1 said he sat near the case agent in the office, and Analyst 2 was embedded with the investigative team and provided tactical intelligence analysis, including analyzing Defendant A’s social media posts, chats, and other communications. Concerning the timing of this interest, in August 2022, Defendant A posted the social media comments about Church 1 described above. In early

Coordinator emailed the Intelligence Analysts he supervised about FBI Richmond's upcoming strategic planning meeting. The Intelligence Program Coordinator requested that the analysts inform him if they had any "products" in mind for the next year. Analyst 1 responded with three ideas for prospective products. The final proposed product was:

DP on increasing intersection of rad-trad (radical-traditional) Catholics and [Domestic Violent Extremists (DVE)].<sup>7</sup> This one is the least fleshed out and is a direct outgrowth of the [Defendant A] case. Feasibility is subject to finding sufficient additional evidence beyond [Defendant A] (co-authored with [Analyst 2] who is almost certainly hearing of this for the first time via this email...).

Analyst 1 told the OIG that he found the investigation of Defendant A interesting from a threat perspective, particularly the potential relationship between Defendant A's history of "antigovernment, antiauthority potential violence, mass shooting threats" and his interest in Organization 1. Analyst 1 stated that he found it "completely incongruous" that a RMVE was attempting "to find common ground or find a community with this particular faith community." Analyst 1 said that there was no evidence that Defendant A was being radicalized at Church 1, because he had been on the FBI's radar "as an unstable, dangerous individual" before "any association with any Catholic related entity whatsoever;" rather, the concern was that Defendant A was attending Church 1 and "interacting with a group of people who...may not understand, or know what to do with someone of his caliber or...his mindset," and that other RMVEs similarly might be attracted to other parishes.

Analyst 1 stated that the intended focus of the proposed DP was on Defendant A and other similar RMVEs, not on a particular church or religion. Both Analysts 1 and 2 denied targeting any individual for holding or practicing a specific religious faith. Analyst 1 acknowledged that all religious beliefs are protected by the First Amendment and called any suggestion that he was motivated by anti-Catholic bias "patently false." Analyst 1 also stated that a close reading of the DP would show that it was intended to focus entirely on the threat posed by RMVEs and to promote outreach to the Catholic Church, in part to protect that community from potentially violent actors. Analyst 2 similarly stated the intent behind the DP was to try to protect these houses of worship by sensitizing them to a potential threat to their congregations.

---

September 2022, Defendant A received delivery of a firearms build kit purchased online using a pseudonym and posted on social media his statements about shooting cops, "ganging up on and beating" racial and religious minorities, having "no tolerance for race traitors," and waging "total war."

<sup>7</sup> The terms Domestic Violence Extremists (DVE) and Racially or Ethnically Motivated Violent Extremists (RMVE) have specific definitions that depend on the advocacy or threat of unlawful acts of force or violence dangerous to human life, not just on beliefs. The FBI and the Department of Homeland Security (DHS) define DVE as an individual who seeks to further ideological goals wholly or in part through unlawful acts of force or violence, stating, "It is important to remember that the mere advocacy of ideological positions...or the use of strong rhetoric does not constitute violent extremism, and in some cases direct or specific threats of violence must be present to constitute a violation of federal law." Similarly, an RMVE is a type of DVE who advocates the unlawful use or threat of force or violence in furtherance of political or social goals that are deemed to derive from racial bias against others. According to an October 2022 FBI and DHS domestic terrorism threat analysis, RMVEs "use both political and religious justifications to support their racially- or ethnically-based ideological objectives and criminal activities."

Analysts 1 and 2 began drafting the DP in November 2022, following the arrest of Defendant A on state charges. Analyst 1 said that they wanted to exploit the data from the search and arrest of Defendant A to get as much information as possible about the communities he was linked to and identify other potential RMVEs. Analyst 1 stated that the goal was to enable FBI Richmond to conduct outreach to these “faith communities to make them aware of what we would call warning signs to radicalization, for the protection of everybody.” Analyst 2 said that there was ample information in Defendant A’s chats and in online chatter suggesting a potential link between white supremacist ideology and an attraction to certain religious beliefs and organizations, including Organization 1, but that the two analysts were searching for more definite substantiation.

While drafting the DP, Analyst 2 said she searched FBI databases and identified two other subjects of predicated investigations that she believed had similar profiles to Defendant A. The investigations were being run out of the FBI’s Portland and Milwaukee Field Offices, respectively. Both subjects were reported white supremacists whom the FBI was investigating for violent threats and who had expressed interest in religious beliefs espoused by Organization 1 and other similar organizations. In December 2022, Analyst 2 contacted FBI Portland and Milwaukee personnel seeking information on those subjects. Analyst 2 briefly summarized the draft DP in these communications and asked for permission to include information about the FBI Portland and Milwaukee subjects in the DP. Both FBI Portland and Milwaukee personnel stated that they had no problem with Analyst 2 using the information in the DP. We found no evidence that Analysts 1 and 2 or other FBI Richmond personnel communicated with the FBI Portland and Milwaukee field offices beyond confirming the details of these two investigations; that FBI Richmond coordinated with FBI Portland, Milwaukee, or other field offices in conducting the investigation of Defendant A; or that FBI Richmond personnel took investigative steps to obtain information for the DP. FBI Richmond utilized FBI and other databases in order to obtain information for the DP.

We asked Analysts 1 and 2 to explain how they chose the term “radical-traditionalist Catholic” or “RTC” used in the DP. Both analysts said that they initially learned this term during the investigation of Defendant A. As described above, Defendant A referred to himself as “rad-trad Catholic clerical fascist” in his social media profile, and both analysts stated that the term appeared to be used commonly online. When asked about references in the DP to outside organizations and sources that use the term “RTC” to describe certain religious entities and ideologies that these organizations and sources have designated as hate groups, both analysts acknowledged that there were concerns about perceived bias on the part of those organizations and sources. However, both analysts said that the intended audience (FBI Richmond executive management) would understand those concerns without the need for commentary and would weigh the information accordingly. Analyst 1 also noted that the evidence supporting the DP was not based on any information from these outside organizations; instead, those organizations were only cited in the “perspective” section to provide additional context.

In mid-December 2022, while still in the process of drafting the DP, Analyst 1 emailed Analyst 2 about potentially “co-authoring a [Strategic Perspective: Executive Analytic Report (SPEAR)] on this rad-trad Catholic/RMVE topic” with FBI Headquarters (FBI HQ) personnel. Analysts 1 and 2 told the OIG that a SPEAR is an intelligence product created for FBI senior leadership and therefore requires coordination with FBI HQ personnel. Analyst 1 stated that while the underlying analysis and analytical rigor is very similar to a DP, a SPEAR is typically a shorter and “more distilled” product intended to be included a briefing book for FBI senior leadership. As described in more detail below, the content of the draft SPEAR prepared by the analysts was almost identical to the DP but was organized differently and condensed. In his mid-December email to Analyst 2 proposing a SPEAR, Analyst 1 wrote that the topic of the DP appeared to have a “national application” and it might make sense to convert it to a SPEAR so that it could be disseminated to a wider audience within the FBI. Analyst 2 responded that she agreed and wrote that she would reach out to an Intelligence Analyst at FBI HQ.

On December 20, 2022, Analyst 2 contacted an Intelligence Analyst (FBI HQ Analyst) in the Domestic Terrorism Operations Section at FBI HQ about the draft DP. Analyst 2 asked if the FBI HQ Analyst “would be interested in co-authoring [the draft DP] or a SPEAR with us?” The FBI HQ Analyst responded that it “sound[ed] interesting” and for Analyst 2 to send the draft DP for her to review. Analyst 2 explained that one piece of substantiation for the DP would center on Defendant A and she was “going to take a look at other RMVE actors that are rad-trads.” The FBI HQ Analyst messaged that she was “really interested in this resurgence of interest in the [C]atholic [C]hurch from our [DVEs].” Analyst 2 then shared a draft of the DP with the FBI HQ Analyst. A few minutes later, the FBI HQ Analyst messaged Analyst 2 that she “like[d] the draft so far” and that the FBI HQ Analyst would reach out to her supervisor about a potential SPEAR. The FBI HQ Analyst’s supervisor confirmed that she was aware that FBI Richmond was in the process of creating a product related to the Defendant A investigation. The FBI HQ Analyst and her supervisor both stated that neither provided FBI Richmond with feedback on the DP prior to its publication. As described below, following the DP’s finalization, a draft SPEAR was sent by Analyst 2 to the FBI HQ Analyst.

Analysts 1 and 2 completed a draft of the DP on January 12, 2023. The draft DP was then peer reviewed by two other Richmond Intelligence Analysts before being sent to two Richmond Supervisory Intelligence Analysts, including the Intelligence Program Coordinator, for review and approval. Analyst 2 also specifically requested that the Richmond Chief Division Counsel (CDC) conduct a legal review of the draft DP. The CDC suggested that the DP should include a First Amendment legal caveat but made no additional edits or suggestions.<sup>8</sup> The DP was ultimately finalized and published on January 24, 2023. Shortly after its

---

<sup>8</sup> This legal caveat was included in the final version of the DP:

Potential criminality exhibited by certain members of a group referenced herein does not negate nor is it a comment on the constitutional rights of the group itself or its members to exercise their rights under the First Amendment to the U.S. Constitution. The FBI does not investigate, collect, or maintain information on U.S. persons solely for the purpose of monitoring activities protected by the First Amendment.

publication, the Richmond Special Agent in Charge (SAC) reviewed the DP on FBI Richmond's Sharepoint site. The SAC commented:

Appreciate this perspective, especially after what was gleaned from the [Defendant A] investigation. I plan to engage in additional conversation regarding engagement with the Diocese of Richmond. I think there is an opportunity here to consider putting several folks in a room (from different locations) to have this conversation.

The SAC stated that he viewed the DP as an outreach document that would assist in his efforts on that front.

After completion of the DP, Analyst 2 drafted a SPEAR based on the DP. The content of the draft SPEAR was almost identical to the DP, although it was organized differently and condensed. Analyst 2 emailed the draft SPEAR to the FBI HQ Analyst on February 2. The FBI HQ Analyst responded, "Thank you for passing this along. I'm gonna [sic] take a look at it along with one of the other [Intelligence Analysts] up here who covers RMVE threats and we'll get our suggestions back to you soon." The FBI HQ Analyst's supervisor stated that she was aware that FBI Richmond wanted to produce a version of the DP that would be more widely distributed within the FBI and was working with the FBI HQ Analyst on a draft product. In anticipation of that product, the supervisor stated that she engaged in a preliminary discussion with the Unit Chief of FBI's Domestic Terrorism Strategic Unit about what type of product was warranted. The supervisor stated that discussions about an additional product ceased once the DP became public on February 8, 2023.

### *Analysis and Conclusions*

Our 120-day review of "the actions and events...that served as a basis" for the Richmond DP determined that Analysts 1 and 2 conceived of the idea for drafting the DP directly from evidence obtained in the predicated investigation into Defendant A, including Defendant A's description of his basis for choosing Church 1, his potential online recruitment of other RMVEs into it and similar churches, his communications with others at Church 1, and his threats of violence against certain groups of individuals. We also found that, after searching FBI databases, Analyst 2 obtained and included in the DP information about two subjects of predicated investigations being conducted by FBI Portland and Milwaukee, respectively, who she believed had similar profiles to Defendant A. Additionally, we determined that, prior to being finalized by Analysts 1 and 2, the draft DP was peer reviewed by two other FBI Richmond Intelligence Analysts; approved by two FBI Richmond Supervisory Intelligence Analysts, including the Intelligence Program Coordinator; and subjected to a legal review by the FBI Richmond CDC.

Further, we found that Analyst 2 sent the draft DP to an FBI HQ Analyst in the Domestic Terrorism Operations Section at FBI HQ in connection with Analysts 1 and 2's interest in developing a SPEAR based on the draft DP. Subsequently, following finalization of the DP, Analysts 1 and 2 prepared a draft SPEAR, almost identical to the issued DP, and shared the draft with the FBI HQ Analyst. We determined that the FBI HQ Analyst's supervisor was aware of the potential SPEAR and had a preliminary discussion with the Unit Chief

of FBI's Domestic Terrorism Strategic Unit about it. However, those discussions ended following the DP becoming public.

Our review did not find evidence that anyone ordered or directed Analyst 1 or 2 to find a link between RMVEs and any specific religion or political affiliation, including Church 1, or that there was any underlying policy direction concerning such a link. Additionally, our review of emails, instant messages, and text messages for Analysts 1 and 2 during the relevant time period did not identify any evidence of discriminatory or inappropriate comments by them about Church 1, or individuals who practiced a particular religious faith or held specific political beliefs. We also found no evidence that Analyst 1 or 2 took investigative steps beyond searching FBI and other databases to obtain information for the DP.

Lastly, while reviewing the FBI's investigation of Defendant A was beyond the scope of our legislative mandate, we note that our review of evidence concerning the development and finalization of the DP did not find evidence that FBI Richmond took investigative steps involving Church 1 or any other church beyond those authorized in the investigation of Defendant A—namely, using a CHS to monitor Defendant A's interactions with others at Church 1 to determine whether he was planning or inciting violence, and interviewing church personnel about Defendant A after his arrest. We found that FBI Richmond used these investigative techniques to obtain information about Defendant A and not to prepare the Richmond DP or collect intelligence more generally.

We note that the INSD report examined a broader range of issues than our limited review, including whether the Richmond DP complied with FBI and Intelligence Community analytical tradecraft standards, whether the internal review process for the DP was sufficient, and whether the removal of the Richmond DP from FBI systems followed appropriate procedures. Based on INSD's findings, the FBI instituted corrective actions, including expanding training on analytical tradecraft standards and domestic terrorism terminology, enhancing review and approval requirements for intelligence products involving a sensitive investigative matter, and formally admonishing the employees involved. We did not assess, and therefore do not comment on, the corrective actions taken by the FBI.

Thank you for your interest in and support for the OIG's work. If you have any questions, please feel free to contact me or Sean O'Neill, Assistant Inspector General for Oversight and Review, at (202) 514-9539.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael E. Horowitz".

Michael E. Horowitz  
Inspector General