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INVESTIGATIONS OF SENIOR OFFICIALS

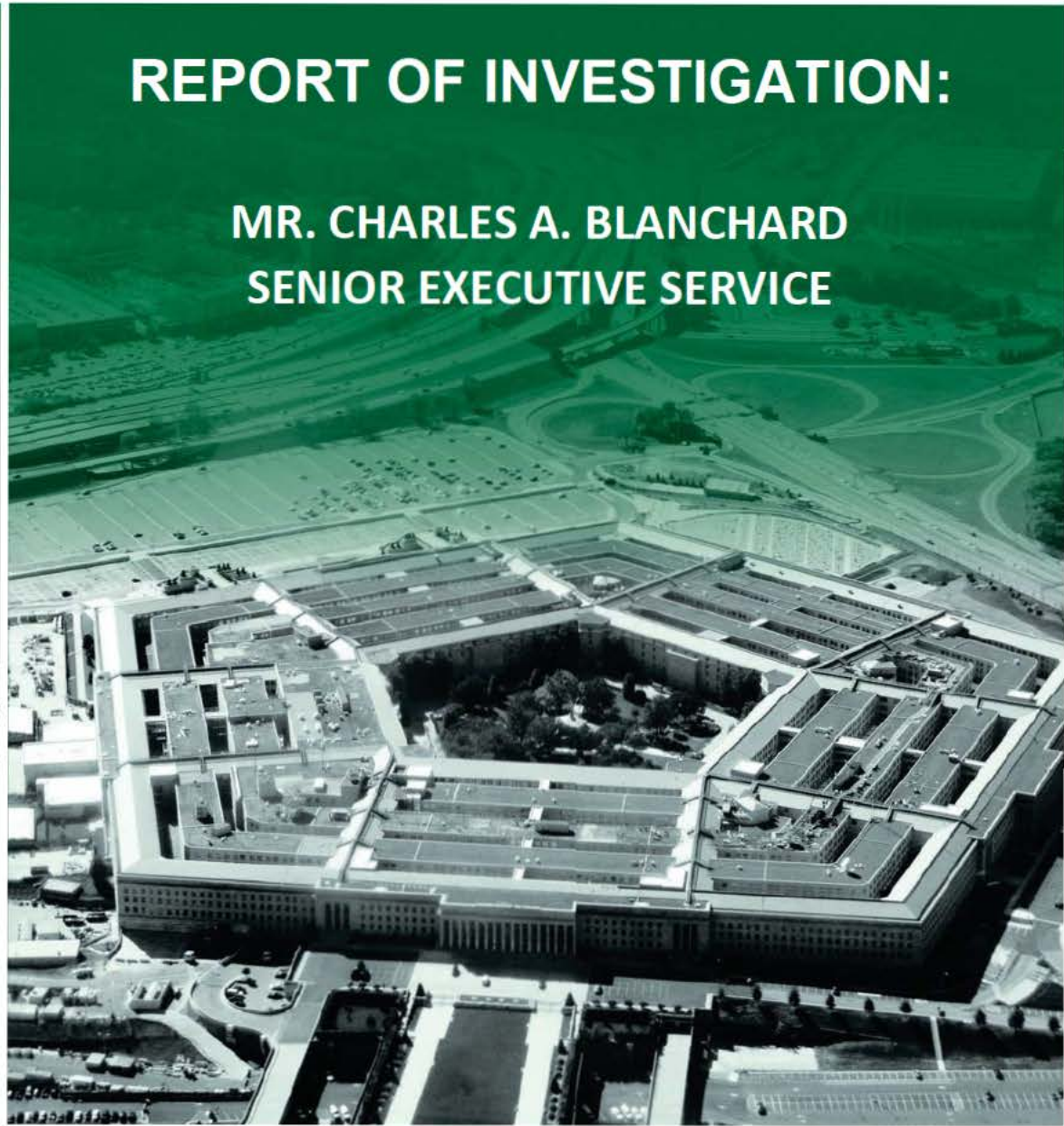
INSPECTOR GENERAL

U.S. Department of Defense

MAY 12, 2014

REPORT OF INVESTIGATION:

MR. CHARLES A. BLANCHARD
SENIOR EXECUTIVE SERVICE



INTEGRITY ★ EFFICIENCY ★ ACCOUNTABILITY ★ EXCELLENCE

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**REPORT OF INVESTIGATION:
MR. CHARLES A. BLANCHARD, SENIOR EXECUTIVE SERVICE**

I. INTRODUCTION AND SUMMARY

We initiated this investigation to address the allegations that Mr. Charles A. Blanchard, while serving as the General Counsel, Department of the Air Force, misused his position to induce a subordinate to provide him airline seat upgrades, (b)(6), (b)(7)(C) (b)(6), (b)(7)(C) and (b)(6), (b)(7)(C) (b)(6), (b)(7)(C). If substantiated, this conduct would violate the Department of Defense (DoD) 5500.07-R, "Joint Ethics Regulation (JER)" and the Office of Personnel Management (OPM) Guide to Senior Executive Service (SES) Qualifications.

We substantiated one allegation. We conclude that Mr. Blanchard misused his position to induce a subordinate to provide him airline seat upgrades. We found that Mr. Blanchard asked one of his subordinate Deputy General Counsels to provide him numerous United Airlines Economy Plus seat upgrades. The upgrading of Mr. Blanchard's airline seating was so commonplace that a mutual expectation developed for the Deputy General Counsel to upgrade Mr. Blanchard's seating. Evidence of the expectation was further reinforced in that Mr. Blanchard knew that the Deputy General Counsel solicited (b)(6), (b)(7)(C) to provide him (Mr. Blanchard) a seat upgrade for one flight. In total, Mr. Blanchard accepted at least 11 airline seat upgrades.

The JER requires employees to avoid any actions creating the appearance that they are violating the law or ethical standards. The JER further prohibits an employee from using his official position to induce another person, including a subordinate, to provide any benefit to himself. We determined that Mr. Blanchard misused his position to induce subordinates to provide him at least 11 airline seat upgrades with a fair market value between \$1,199 and \$1,859.

We did not substantiate the remaining allegations.

By letter dated December 17, 2013, we provided Mr. Blanchard the opportunity to comment on the results of our investigation. In his response, dated January 6, 2014, Mr. Blanchard disagreed with our conclusion that (b)(6), (b)(7)(C) (b)(6), (b)(7)(C). Based on information he presented, we conducted an additional witness interview and modified our conclusion.

Mr. Blanchard also disagreed that he misused his position to induce a subordinate to provide him airline seat upgrades. Mr. Blanchard contended that the upgrades were generated from official travel, were received directly from the airline, and were not gifts as defined by the Title 5, Code of Federal Regulations, Section 2635.203(b), "Gifts." In his response, Mr. Blanchard referenced a discussion during the Summer of 2013 between the subordinate and

¹ The complaint contained additional allegations. Based on our investigation, these allegations did not merit further investigation and are addressed in Section III of this report.

Mr. Donald Fox, who at the time was General Counsel, Office of Government Ethics (OGE). Mr. Blanchard related that it was his belief that Mr. Fox did not view this type of upgrade as a gift from a subordinate. We contacted OGE to discuss Mr. Fox's opinion. OGE had not taken an official position concerning this issue and had no plans to do so at this time. Additionally, OGE had no record of Mr. Fox's communications with the subordinate or Mr. Blanchard. After reviewing the matters presented by Mr. Blanchard, we stand by our conclusion.²

We will provide a copy of this report to the Secretary of the Air Force and notify the Director, Office of Personnel Management, of the substantiated allegation.

This report sets forth our findings and conclusions based upon the preponderance of evidence.

II. BACKGROUND

Mr. Blanchard served as the General Counsel, Department of the Air Force, from June 2009 until December 2013, when he resigned from Government Service. As the General Counsel, Mr. Blanchard is the chief legal officer providing oversight, guidance, and direction for legal advice provided by more than 2,600 Department of the Air Force military and civilian lawyers worldwide. Mr. Blanchard is also the Department of the Air Force Designated Agency Ethics Official (DAEO). As the DAEO, Mr. Blanchard is responsible for the implementation and administration of all aspects of the Department of the Air Force ethics program, including managing and overseeing local implementation and administration of all matters relating to ethics covered by the JER.

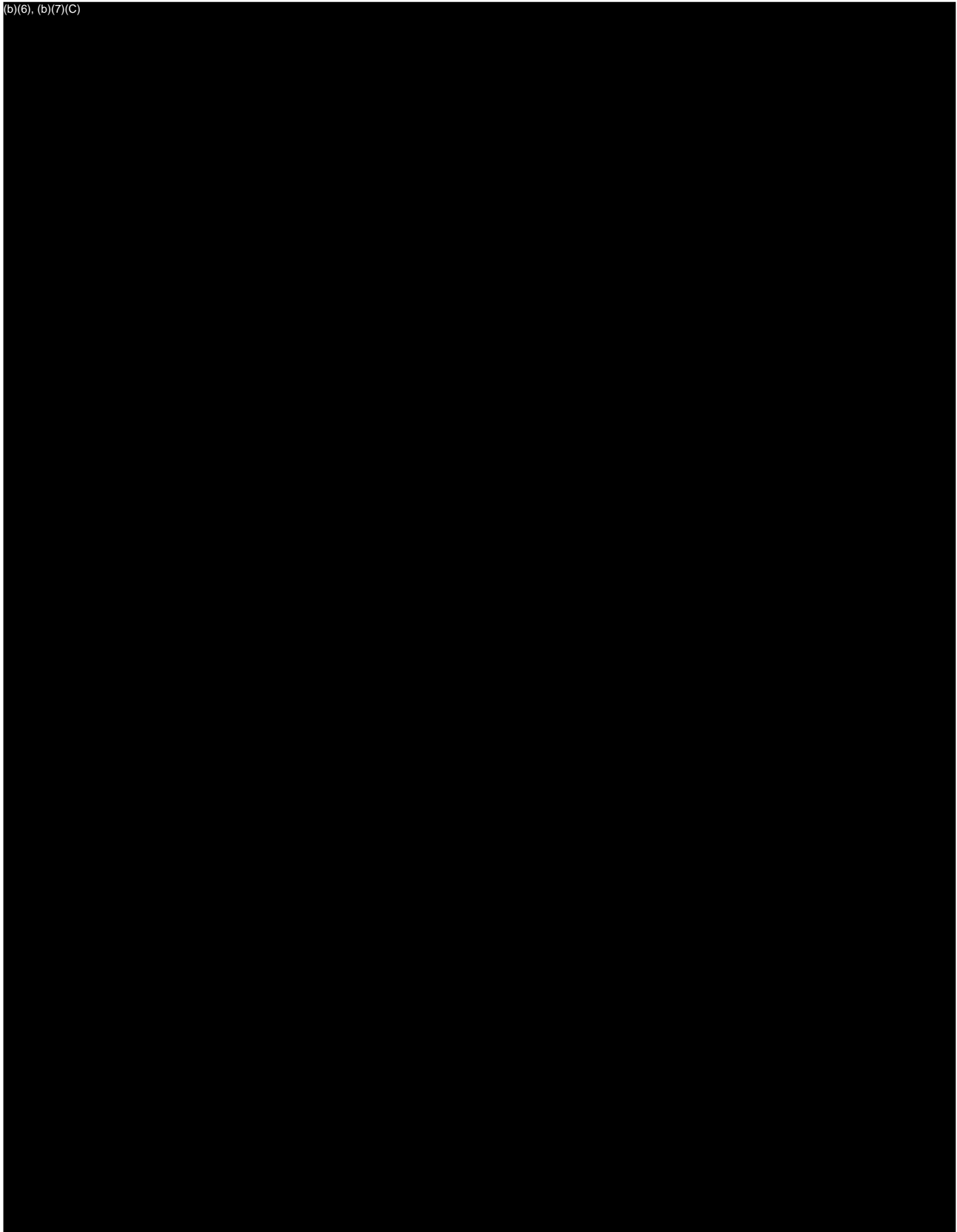
III. SCOPE

We interviewed Mr. Blanchard and nine witnesses with knowledge of the matters under investigation. The witnesses included senior military and civilian personnel currently or formerly assigned to the Office of the General Counsel, Department of the Air Force (SAF/GC), or the Office of The Judge Advocate General (TJAG), U.S. Air Force. We reviewed Defense Finance and Accounting Service (DFAS) travel records, personal airline mileage statements, official email messages, and other relevant documents and standards that govern the issues under investigation.

The DoD Hotline complaint included allegations against one of Mr. Blanchard's deputy general counsels, Mr. Michael W. Zehner, former Deputy General Counsel for International Affairs (SAF/GCI), who retired in August 2013. Allegations against Mr. Zehner are addressed in a separate case.

² While we have included what we believe is a reasonable synopsis of Mr. Blanchard's response, we recognize that any attempt to summarize risks oversimplification and omission. Accordingly, we incorporated Mr. Blanchard's comments where appropriate throughout this report and provided a copy of his response to the Secretary of the Air Force together with this report.

(b)(6), (b)(7)(C)



IV. FINDINGS AND ANALYSIS

A. Did Mr. Blanchard misuse his position to induce a subordinate to provide him airline seat upgrades?

Standards

DoD 5500.07-R, “Joint Ethics Regulation (JER),” August 23, 1993, including changes 1-7 (November 17, 2011)

The JER provides a single source of standards of ethical conduct and ethics guidance for DoD employees. Chapter 2, “Standards of Ethical Conduct,” incorporates Title 5, Code of Federal Regulations (CFR), Part 2635, “Standards of Ethical Conduct for Employees of the Executive Branch,” in its entirety.

Subpart A, “General Provisions,” Section 2635.101, “Basic obligation of public service,” states in paragraph (b)(1) public service is a public trust, requiring employees to place loyalty to the Constitution, the laws and ethical principles above private gain; and in paragraph (b)(14) that employees shall endeavor to avoid any actions creating the appearance that they are violating the law or the ethical standards set forth in this part. Whether particular circumstances create an appearance that the law or these standards have been violated shall be determined from the perspective of a reasonable person with knowledge of the relevant facts.

Subpart B, “Gifts From Outside Sources”

Section 2635.203, “Definitions,” states that a gift is any gratuity, favor, discount, entertainment, hospitality, loan, forbearance, or other item having monetary value. It includes gifts of transportation whether provided in-kind, by purchase of a ticket, payment in advance, or reimbursement after the expense is incurred. Market value is the retail cost the employee would incur to purchase the gift.

Subpart C, “Gifts Between Employees”

Section 2635.302(a), “Gifts to Superiors,” states an employee may not, except as provided in this subpart, (1) directly or indirectly, give a gift to or make a donation toward a gift for an official superior; or (2) solicit a contribution from another employee for a gift to either his own or the other employee’s official superior.

Section 2635.302(b), “Gifts from employees receiving less pay,” prohibits an employee from, directly or indirectly, accepting a gift from an employee receiving less pay than himself unless the two employees are not in a subordinate-official superior relationship, and there is a personal relationship between the two employees that would justify the gift.

Section 2635.303, “Definitions,” states an official superior is any employee, including but not limited to an immediate supervisor, whose official responsibilities include directing or evaluating the performance of the employee’s official duties. An employee is the subordinate of any of his official superiors. Gift has the meaning as stated above in Subpart B, Section 2635.203.

Section 2635.304(a) “General exceptions,” provides that on an occasional basis, including any occasion on which gifts are traditionally given or exchanged, an official superior may accept items, other than cash, with an aggregate market value of \$10 or less per occasion from a subordinate or other employee receiving less pay.

Subpart G, “Misuse of Position,” Section 2635.702, “Use of public office for private gain,” states in paragraph (a) an employee shall not use his Government position to coerce or induce another person, including a subordinate, to provide any benefit, financial or otherwise, to himself.

Facts

The complaint alleged that Mr. Blanchard improperly received gifts of United Airlines seat upgrades from Mr. Zehner while on official travel. During the conduct of the investigation, a witness testified that (b)(6), (b)(7)(C) told her that Mr. Zehner asked him to use his frequent flyer status to upgrade Mr. Blanchard’s seating on a flight to Singapore.

United Airlines’ Frequent Flyer Program

Mileage Plus is United Airlines’ frequent flyer program. Mileage Plus members who travel the required number of qualifying miles or segments may earn premier status of silver, gold, platinum, or 1K. Premier status members have complimentary access to Economy Plus seating for themselves and companion(s) at check-in or booking based on Premier level. The table below lists the Economy Plus seating benefits available to each Premier level.

Table 1. United Airlines’ Frequent Flyer Program Status and Benefits

Benefit	Premier Silver	Premier Gold	Premier Platinum	Premier 1K®
Complimentary Access to Economy Plus Seating	At check-in	At booking	At booking	At booking
Maximum Number of Economy Plus Companions	1	1	8	8
Confirmation of Economy Plus Seat Upgrades As Early As	Day of departure	48 hours	72 hours	96 hours

Mr. Blanchard’s Mileage Plus account statements reflected that he opened a Mileage Plus account with United Airline (b)(6), (b)(7)(C)

Mr. Zehner's Mileage Plus account statements reflected that he had (b) (6), (b) (7)(C)

Mr. Blanchard's Economy Plus Seat Upgrades

Witnesses testified Mr. Zehner (b) (6), (b) (7)(C) upgraded seating for Mr. Blanchard. A witness testified that Mr. Blanchard directed (b) (6), (b) (7)(C) "to get seats ticketed as soon as possible, so that Mr. Zehner could work his magic and get him special seats." The witness also testified that on more than one occasion she heard Mr. Blanchard say to Mr. Zehner, "Mike, work your magic" or ask Mr. Zehner "have you gotten my seating for me yet?" The witness related that she assumed Mr. Zehner called United Airlines to upgrade Mr. Blanchard's seats because Mr. Blanchard would ask Mr. Zehner if he had "worked his magic and had he called, or words to that effect."

A second witness testified that Mr. Zehner and (b) (6), (b) (7)(C) always discussed in Mr. Blanchard's presence whether (b) (6), (b) (7)(C) would use their airline points to upgrade Mr. Blanchard's seating (b) (6), (b) (7)(C) and they asked her to get them ticketed sooner than normal for a trip to Australia.

On May 1, 2012, in an email concerning Mr. Blanchard and Mr. Zehner's May 13, 2012, trip to Southwest Asia, Mr. Zehner asked (b) (6), (b) (7)(C) and Mr. Blanchard's (b) (6), (b) (7)(C) "please let me know as soon as ticketed so I can try to get Mr. Blanchard into Economy Plus." On May 2, 2012, Mr. Blanchard forwarded his travel document approval notification concerning the Southwest Asia trip to Mr. Zehner and wrote, "We only have United one way. Can you call United about Economy Plus for those flights?" On May 9, 2012, the commercial travel office issued airline tickets for the trip. On May 12, 2012, the trip was cancelled because they had not received their approved visas.

A witness testified that (b) (6), (b) (7)(C) told her that Mr. Zehner asked him to use his status to upgrade Mr. Blanchard's seating on a night (b) (6), (b) (7)(C) and Mr. Zehner both confirmed that Mr. Zehner asked the (b) (6), (b) (7)(C) Mr. Blanchard to Economy Plus seating for the June 2012 flight to Singapore.

Mr. Zehner testified he upgraded Mr. Blanchard's seating "[w]henver I traveled with him. Sometimes it worked, sometimes it didn't." Mr. Zehner stated that he and Mr. Blanchard developed a "mutual expectation" that when they traveled together, he (Mr. Zehner) would call United Airlines and use his status to upgrade their seats. Mr. Zehner related he would use his status to upgrade seating for an employee who was accompanying him. He stated he had upgraded (b) (6), (b) (7)(C) seating. Mr. Zehner added "it was a no brainer."

³ In this report we identify (b) (6), (b) (7)(C)

Mr. Zehner further testified that if he could only upgrade seating for one companion he would always choose “the boss over the boss” (b)(6), (b)(7)(C)

(b)(6), (b)(7)(C) Mr. Zehner stated:

I think in the military there’s a structure of trying to make sure the boss is as comfortable as possible. . . . I don’t think that I would be in the minority here that you would suggest that your boss would be the appropriate one to do.

Travel itineraries and DFAS travel vouchers indicated that from June 2009 to October 2012, Mr. Blanchard traveled with Mr. Zehner on 20 United Airlines flights. Mr. Blanchard had Economy Plus seating on 10 of the 20 flights and upgraded himself to First Class seating on one of the 20 flights. Additionally, witness testimony indicated that Mr. Blanchard had Economy Plus seating on one of the two United Airline flights he traveled with (b)(6), (b)(7)(C) in June 2012. The table below lists by year the number of United Airlines flights by type of seating when either Mr. Zehner or (b)(6), (b)(7)(C) accompanied Mr. Blanchard.

Table 2. Mr. Blanchard’s Upgraded Seating on United Airlines Flights with Subordinates

Year	Number of United Airlines Flights	Coach	Economy Plus	First Class
2009	2			1
			6	
	4		4	
2012	9	7	1	
Total	22	10	11	1

Mr. Blanchard testified that Mr. Zehner called and upgraded his (Mr. Blanchard’s) seating for several flights. He added that he did not remember how many times Mr. Zehner had done this as he could only upgrade actual United Airlines flights. Mr. Blanchard also testified that he had Economy Plus seating on the June 2012 flight to Singapore and that he and (b)(6), (b)(7)(C) were on the same flight. Mr. Blanchard stated that Mr. Zehner could not upgrade him because Mr. Zehner was not on the flight. Mr. Blanchard added that he thought Mr. Zehner asked (b)(6), (b)(7)(C) to upgrade his (Mr. Blanchard’s) seating for this flight.

Fair Market Value of Economy Plus Seat Upgrades

Participants in the United Airlines’ frequent flyer mileage program, Mileage Plus, could exchange mileage to upgrade to Economy Plus seating. Travelers could also purchase Economy Plus seating for each flight at a cost ranging from \$109 to \$169 based on the aircraft, passenger load, and time of year.

Mr. Blanchard testified that the seat upgrades did not have value because Mr. Zehner was able to upgrade due to his Premier Plus status. Mr. Blanchard did not know the fair market value of the seat upgrades he received and stated that upgrades were available for purchase for some flights.

Ethics Advice Regarding Seat Upgrades

(b)(6), (b)(7)(C) testified that Mr. Tanner was concerned about the appearance or the ethics of Mr. Blanchard receiving seat upgrades from a subordinate, Mr. Zehner (b)(6), (b)(7)(C) related that Mr. Tanner asked her for information about upgrades and the United Airlines' frequent flyer program. (b)(6), (b)(7)(C) also testified that she provided Mr. Tanner the information she obtained from the United Airlines Mileage Plus website. (b)(6), (b)(7)(C) further testified that Mr. Tanner contacted (b)(6), (b)(7)(C) and "informally" asked for ethical advice concerning the upgrades. (b)(6), (b)(7)(C) testified that (b)(6), (b)(7)(C) did not know the outcome on whether the upgrades were a concern prior to (b)(6), (b)(7)(C), (b)(6), (b)(7)(C).

We interviewed Mr. Tanner concerning this matter. When asked what his concerns were regarding Mr. Blanchard's airline seat upgrades, Mr. Tanner responded, "I don't know what you're talking about." When informed that evidence suggested that he inquired into the upgrading of Mr. Blanchard's airline seats, Mr. Tanner responded, "I have no knowledge about any upgrades of – I had nothing to do with Mr. Blanchard's travel arrangements." When asked what conversations he heard or that were relayed to him reference Mr. Blanchard upgrading airline seats, Mr. Tanner responded, "I just don't have any knowledge about that. ... I never heard anything that I thought may violate the Joint Travel Regulations." When asked what comments he heard regarding upgrading seats, Mr. Tanner responded, "I don't know anything about upgrading." Mr. Tanner further testified that (b)(6), (b)(7)(C) paid to upgrade her seat on a flight, "but that's the only upgrade conversation I've ever heard." When asked what conversations he had with Mr. Zehner reference seat upgrades, Mr. Tanner responded, "I'm not – I'm not close to Mr. Zehner."

We subsequently contacted (b)(6), (b)(7)(C) who provided a copy of an email (b)(6), (b)(7)(C) sent to Mr. Tanner on August 2, 2012. Ms. Bradley's email provided Mr. Tanner with answers to questions he raised with (b)(6), (b)(7)(C) that morning. In (b)(6), (b)(7)(C) email, (b)(6), (b)(7)(C) wrote that the DoD OGC legal expert on matters involving travel advised (b)(6), (b)(7)(C).

(b)(6), (b)(7)(C) added that a (b)(6), (b)(7)(C) (b)(5) However, (b)(6), (b)(7)(C) also wrote that the (b)(5), and added:

(b)(5)

When asked about (b)(6), (b)(7)(C) August 2, 2012, email, Mr. Tanner testified that he spoke to (b)(6), (b)(7)(C) because (b)(6), (b)(7)(C) asked him if it was inappropriate for Mr. Zehner to upgrade or to offer to upgrade Mr. Blanchard's United Airlines seating. Mr. Tanner related that he must have met with (b)(6), (b)(7)(C), but he did not recall the conversation he had with her. When asked what actions he took after he received (b)(6), (b)(7)(C) email, Mr. Tanner responded, "I'm sure I conveyed that information to (b)(6), (b)(7)(C) When asked if he spoke to Mr. Blanchard

about the concerns that were raised, Mr. Tanner responded, “no.” When asked what he thought about the information provided him in the email, Mr. Tanner responded:

I didn't have any knowledge of the truth of any underlying – of whether that was – whether Mr. Zehner had in fact done that or not. So I didn't really form an opinion. I simply reported the outcome of that conversation to She's the one who claimed to have knowledge of that, not me.

Mr. Blanchard testified he did not recall any conversations with Mr. Tanner regarding seat upgrades. When asked why Mr. Tanner contacted the DoD SOCO about a subordinate giving airline seat upgrades to a superior, Mr. Blanchard replied, “I don't know. If he had done that, I wish he had talked to me.”

Mr. Blanchard further testified he was the Department of the Air Force DAEO and received training every year on the rules concerning gifts, including gifts from subordinates. When asked what his understanding of the rules regarding accepting gifts from a subordinate was, Mr. Blanchard responded:

My understanding has changed, because I was under the incorrect view for a long time, until actually I heard about this investigation, that it dealt with a salary, that if the person had a lower salary than you, then you – you know, then you could not accept the gift. I have since looked at the rule, and now know that it's, you know, a subordinate or someone who has a salary that is lower than yours, and that you're not supposed to accept gifts, except for certain exceptions, such as special occasions, retirements. ... I knew that my salary was lower than Mike's, so I -- that may be one reason I just didn't think of the subordinate gift rule. And also, it ... something that Mike didn't have that was of any benefit to himself being a gift. It was just his ability to get the airline ... to upgrade.

Discussion

We conclude that Mr. Blanchard misused his position to induce a subordinate to provide him airline seat upgrades. We found that Mr. Blanchard asked his subordinate, Mr. Zehner, to provide him numerous United Airlines Economy Plus seat upgrades. Mr. Blanchard openly discussed the upgrading of his airline seat with Mr. Zehner while in the presence of subordinates. Mr. Zehner testified that he would always choose his official superior over a subordinate when upgrading a companion's airline seating.

We also found the upgrading of Mr. Blanchard's airline seating was so commonplace that a mutual expectation developed for Mr. Zehner to upgrade Mr. Blanchard's seating. Evidence of the expectation was further reinforced in that Mr. Blanchard knew Mr. Zehner solicited to provide him (Mr. Blanchard) a seat upgrade for one flight. In total, Mr. Blanchard accepted at least 10 United Airline Economy Plus seat upgrades from Mr. Zehner

and one from . Each United Airlines Economy Plus seat upgrade had a market value ranging from \$109 to \$169 and met the JER definition of a gift.

We further found that as the Department of the Air Force DAEO, Mr. Blanchard is responsible for implementing and administering the Department of the Air Force ethics program and all matters relating to ethics covered by the JER.

The JER requires employees to avoid any actions creating the appearance that they are violating the law or ethical standards. The JER further prohibits an employee from using his official position to induce another person, including a subordinate, to provide any benefit to himself.

We determined that Mr. Blanchard misused his position to induce subordinates to provide him at least 11 airline seat upgrades with a collective market value between \$1,199 and \$1,859. As the Department of the Air Force DAEO, Mr. Blanchard reasonably should have known it was a violation of the JER for him to misuse his position to induce another person, including a subordinate, to provide a benefit. Additionally, Mr. Blanchard should have known it was also a violation of the JER for Mr. Zehner and to give gifts of airline seat upgrades to a superior. Accordingly, we conclude Mr. Blanchard misused his position to induce a subordinate to provide him airline seat upgrades.

Response to Tentative Conclusion

In his response, Mr. Blanchard wrote that United Airlines, and not Mr. Zehner, provided him the companion seat upgrade. Mr. Blanchard argued that airline frequent flyer seat upgrades generated from official travel were not gifts as defined by 5 CFR 2635.203 and therefore did not violate 5 CFR 2635.302. Mr. Blanchard reasoned that his airline seat upgrades were “an item secured under a Government contract,” because Mr. Zehner earned his United Airline Premier status as a result of official travel and the companion seat upgrades were used only on official travel.

Mr. Blanchard contended that Mr. Zehner did not provide him with a voucher or coupon nor did Mr. Zehner purchase or use frequent flyer mileage to upgrade his (Mr. Blanchard’s) airline seat. Mr. Blanchard wrote that United Airlines provided him the companion upgrade, because he was traveling with Mr. Zehner. Mr. Blanchard wrote:

Mr. Zehner gave me nothing. All he did was call United and provide my name as a person meeting United’s criteria for a companion upgrade. Mr. Zehner made a phone call—that was the sum total of his actions.

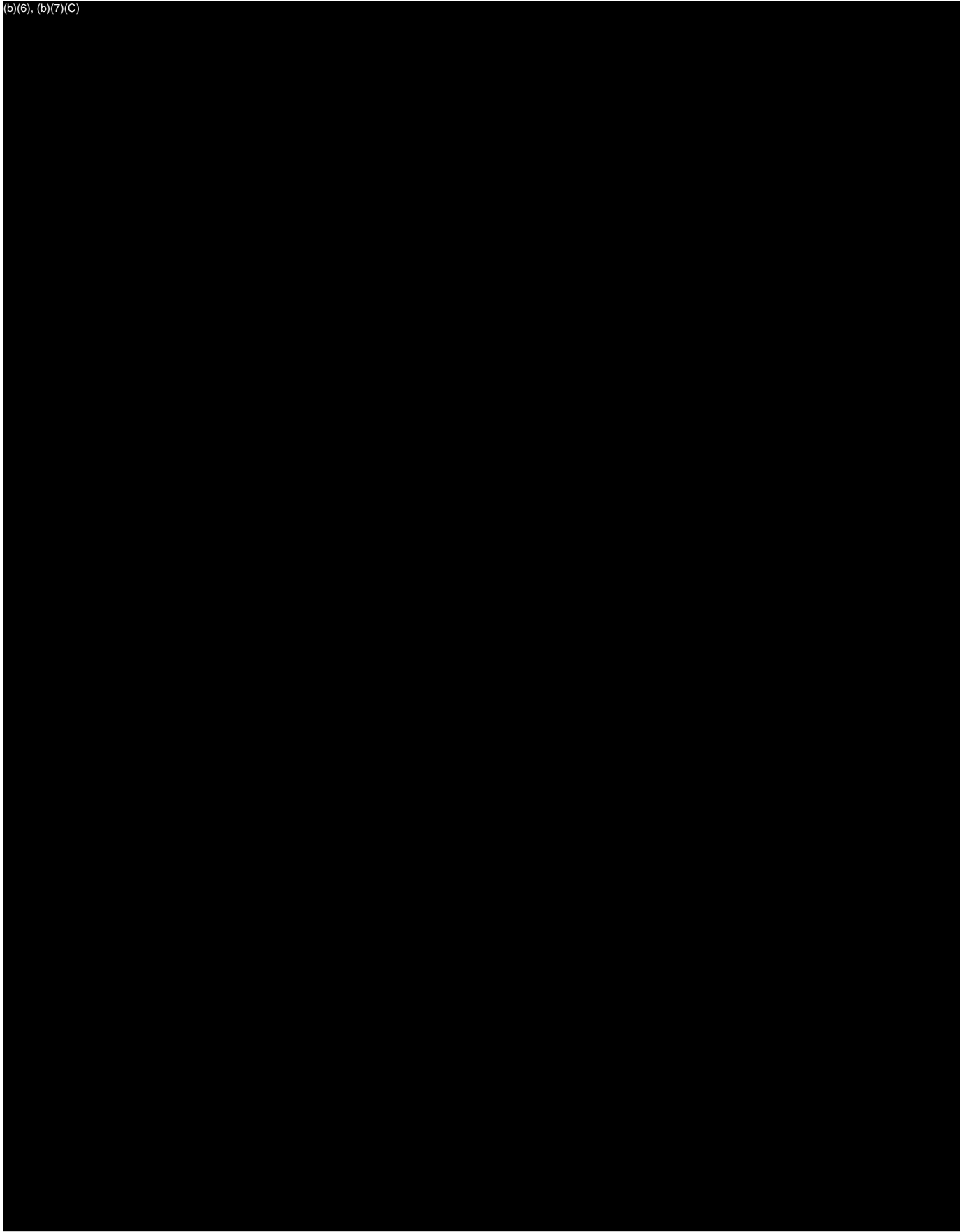
We acknowledge that a Government employee can accrue and later use their own frequent flyer benefits while on official travel. However, Mr. Blanchard did not use his own frequent flyer benefits; he repeatedly prompted a subordinate to call United Airlines and use the subordinate’s frequent flyer benefits to upgrade his (Mr. Blanchard’s) seating.

In his response, Mr. Blanchard also referenced a discussion during the Summer of 2013 between Mr. Zehner and Mr. Donald Fox, who at the time was General Counsel, Office of Government Ethics (OGE). Mr. Blanchard related that it was his belief that Mr. Fox did not view this type of upgrade as a gift from a subordinate.

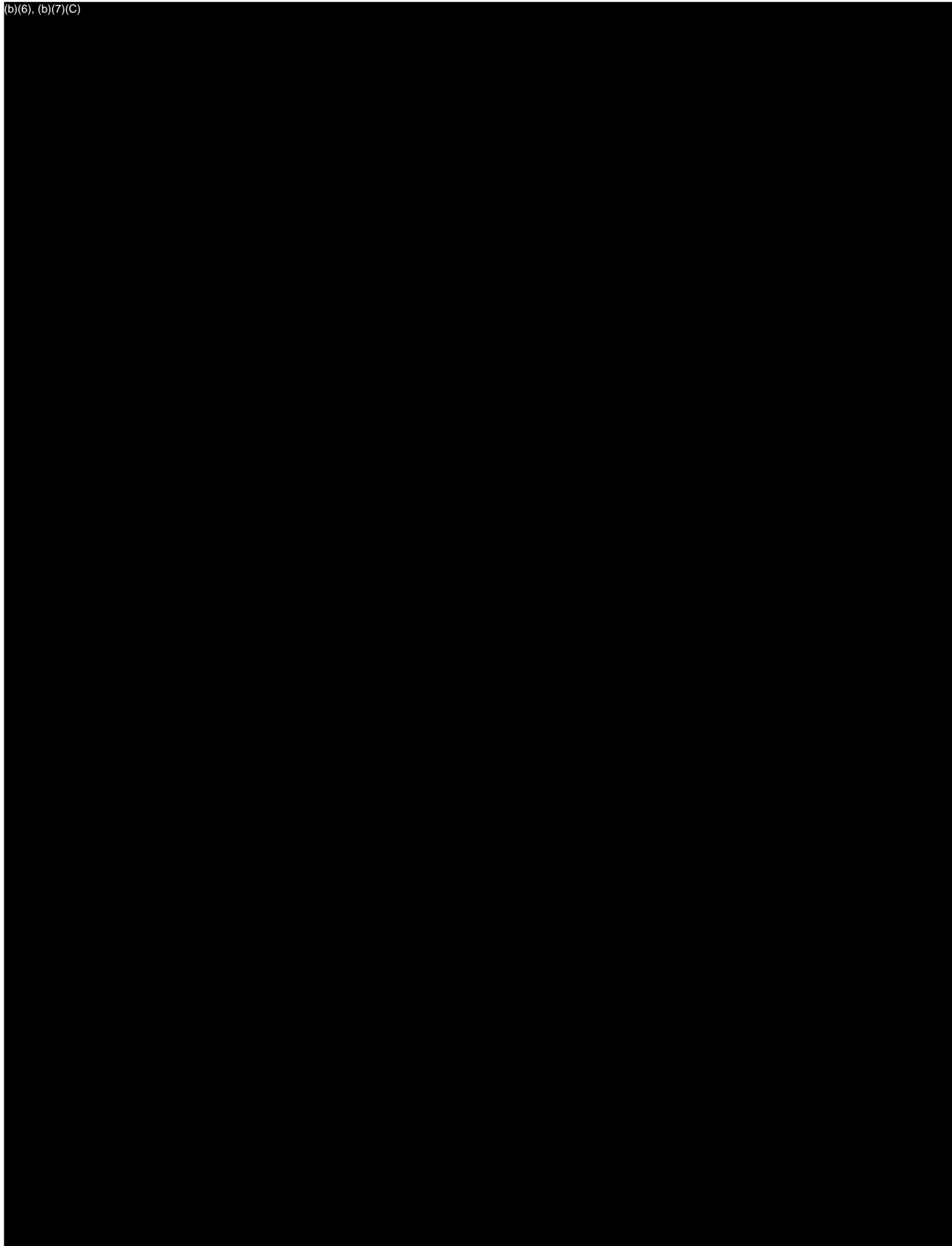
We contacted OGE to discuss Mr. Fox's opinion. On April 28, 2014, we discussed the appropriateness of an official superior accepting a companion upgrade from a subordinate with Mr. David Apol, the current General Counsel, OGE, and Mr. Joseph Gangloff, Deputy Director for Compliance, OGE. Mr. Apol and Mr. Gangloff related that OGE had not taken an official position concerning this issue and had no plans to do so at this time. Additionally, OGE had no record of Mr. Fox's communications with Mr. Zehner or Mr. Blanchard.

After carefully considering Mr. Blanchard's response, we stand by our conclusion that Mr. Blanchard misused his position to induce a subordinate to provide him airline seat upgrades.

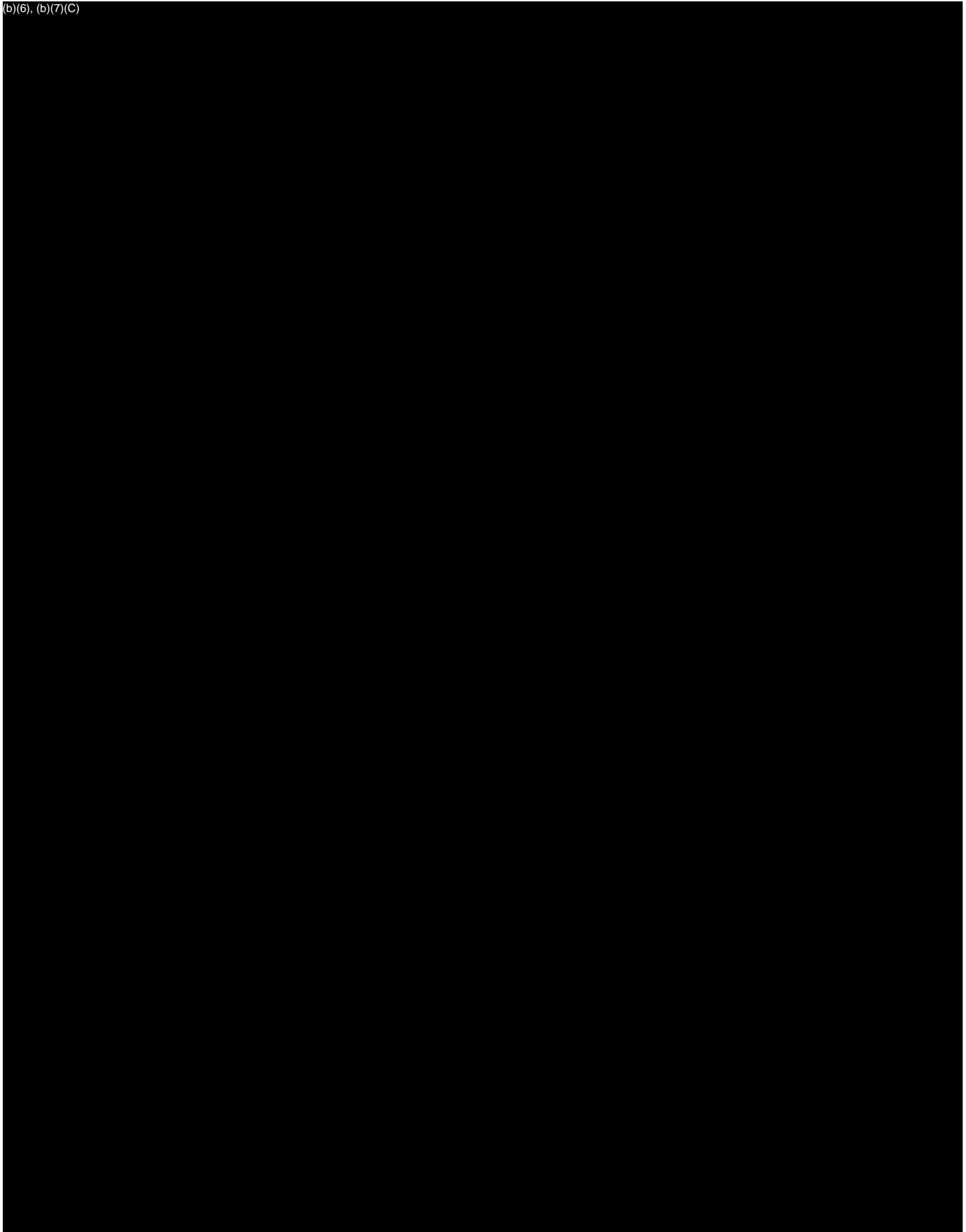
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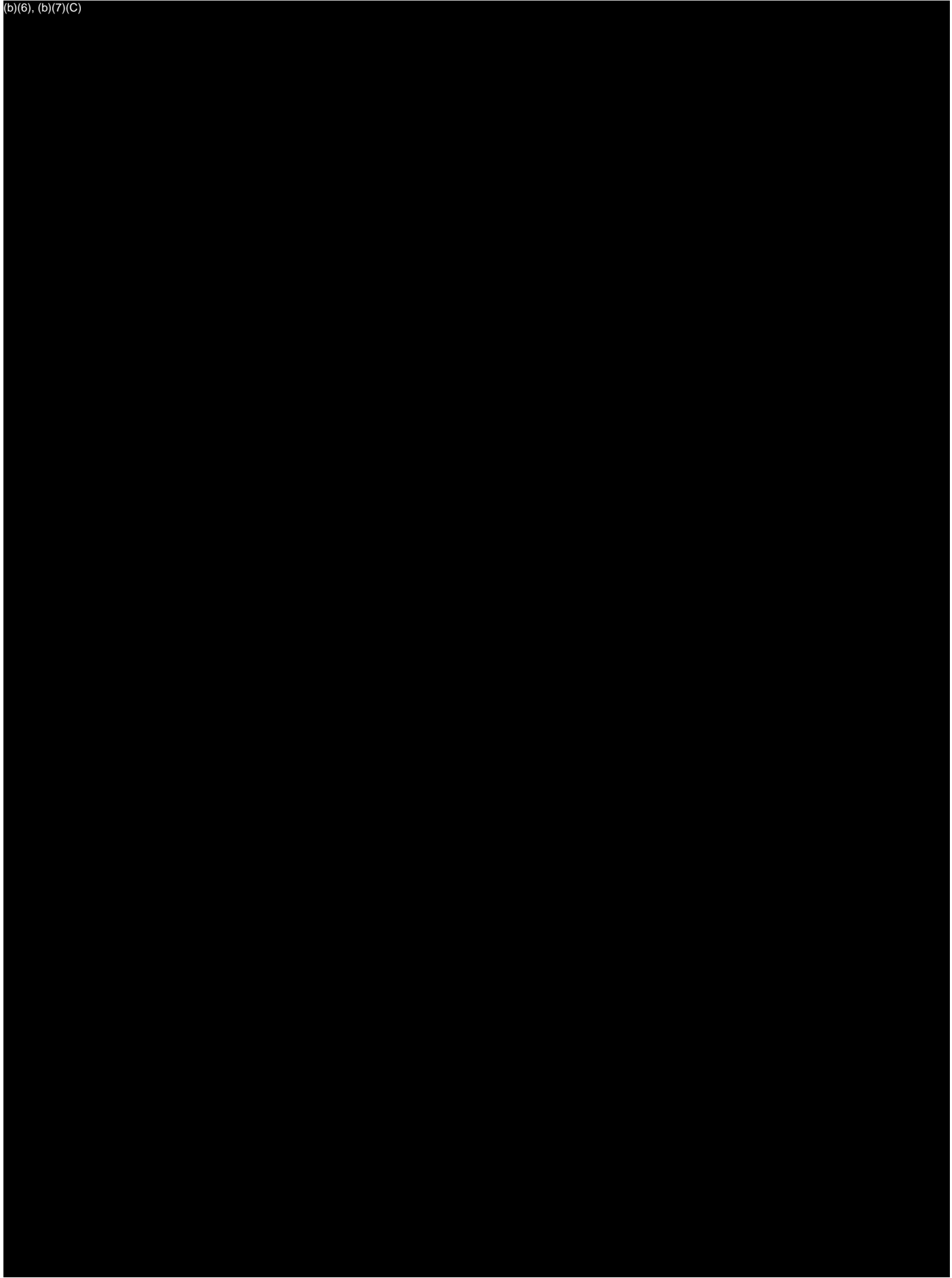
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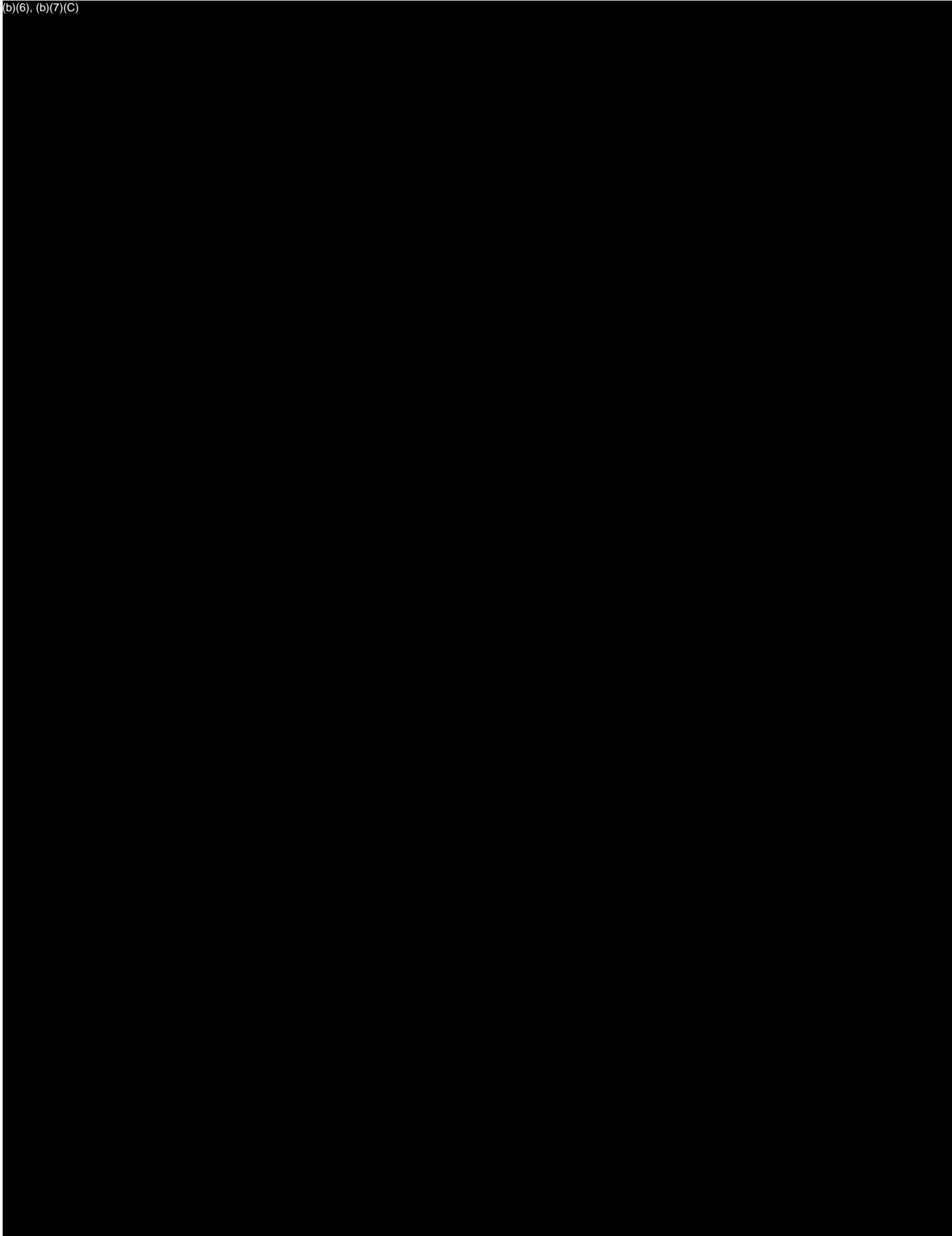
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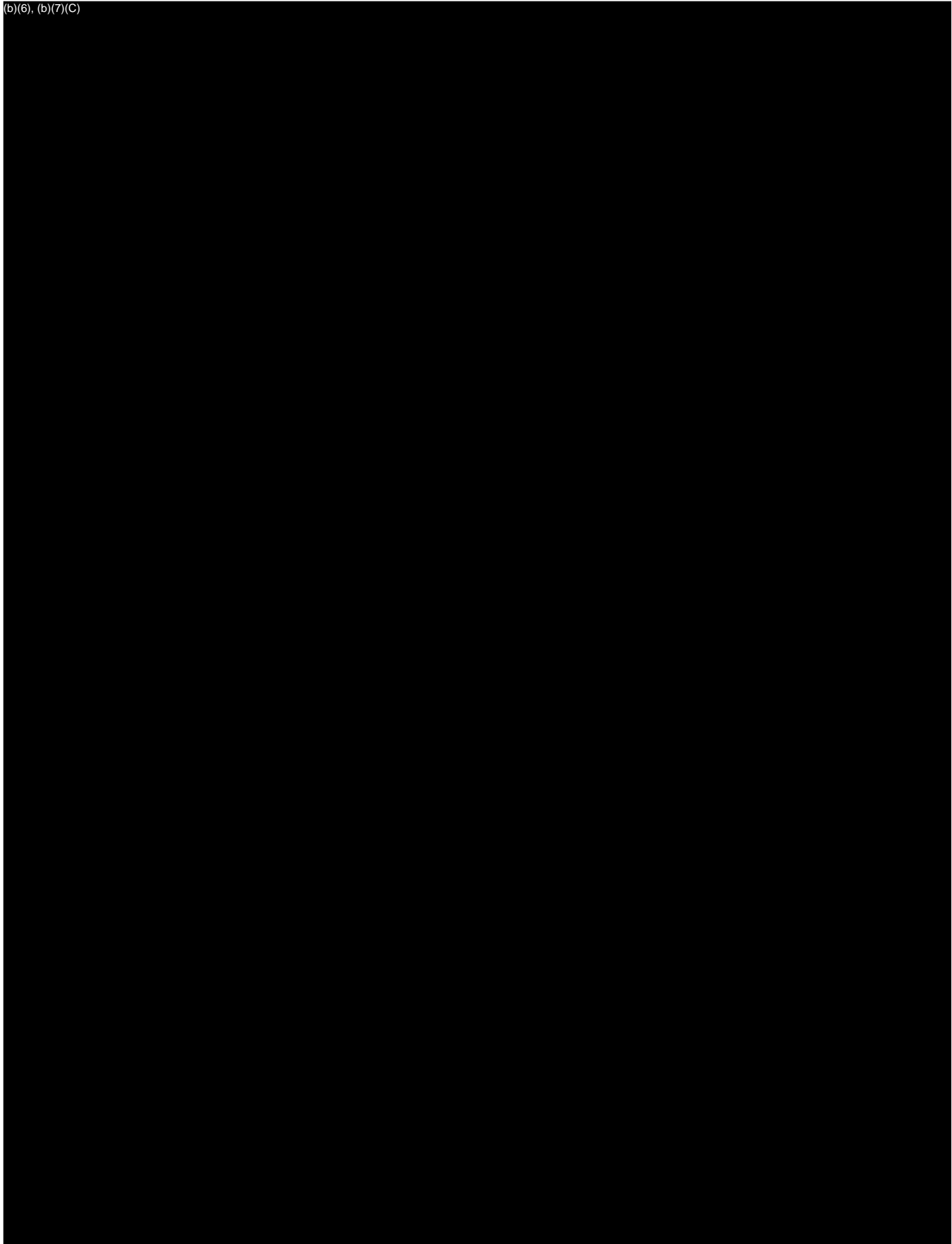
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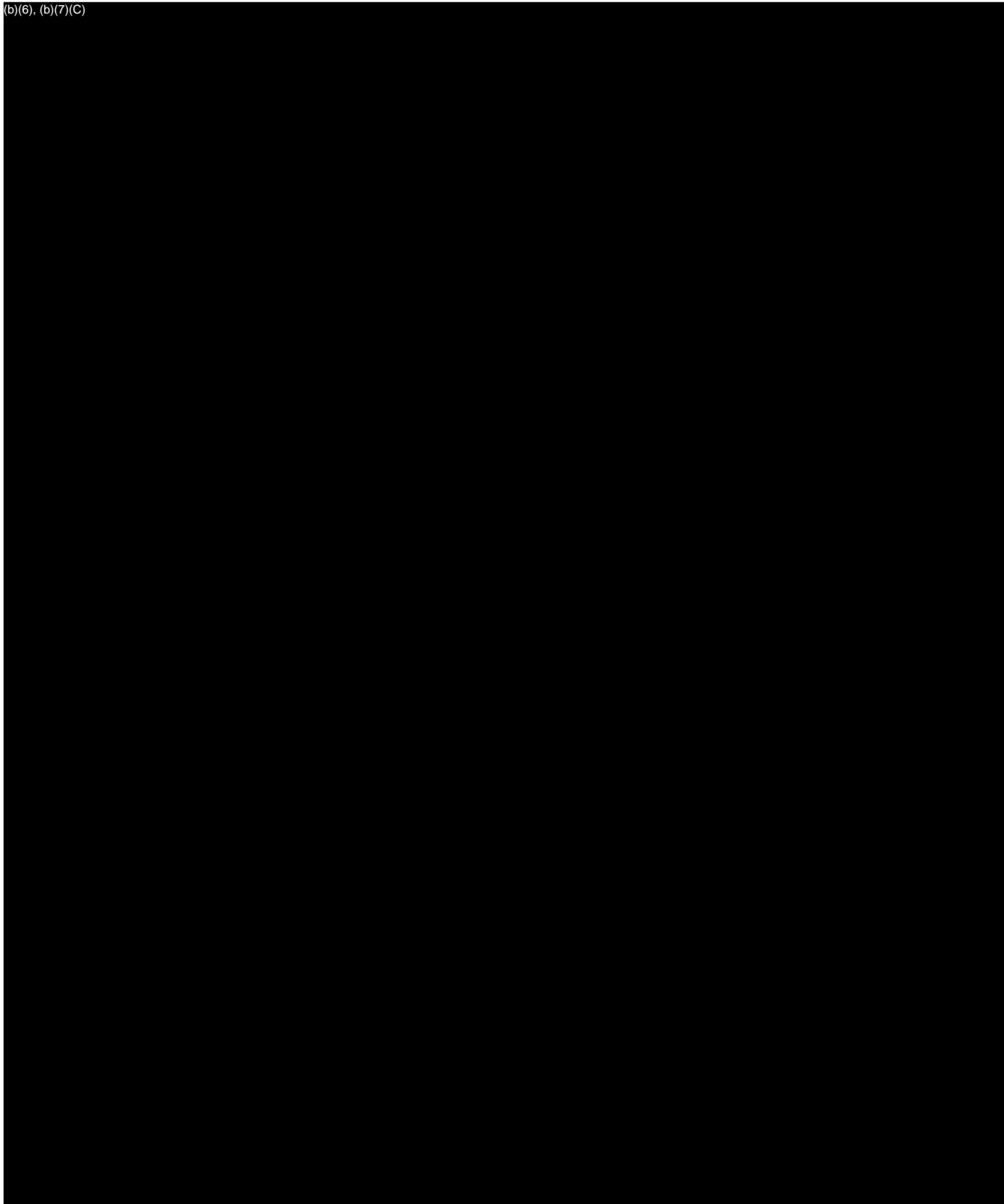
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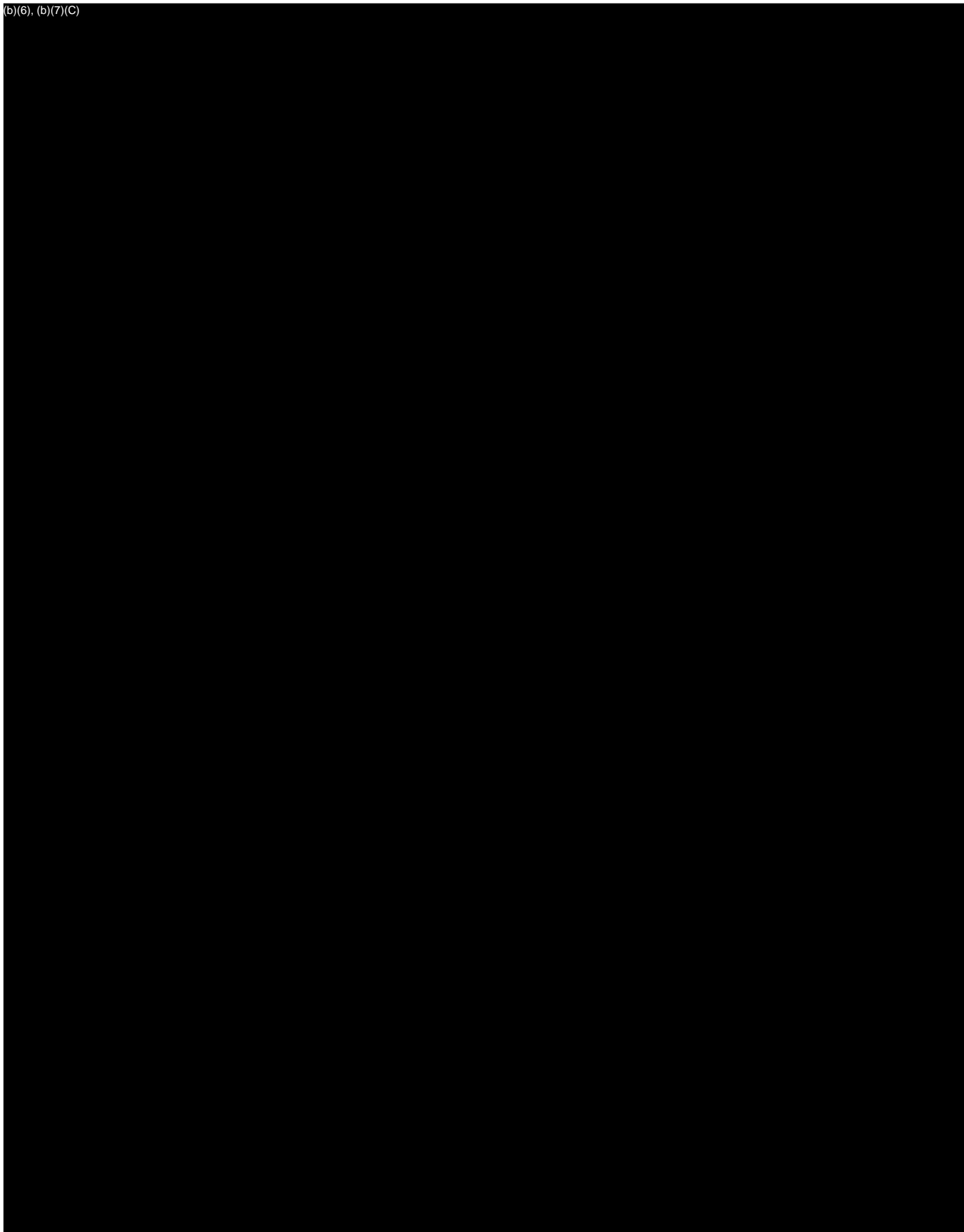
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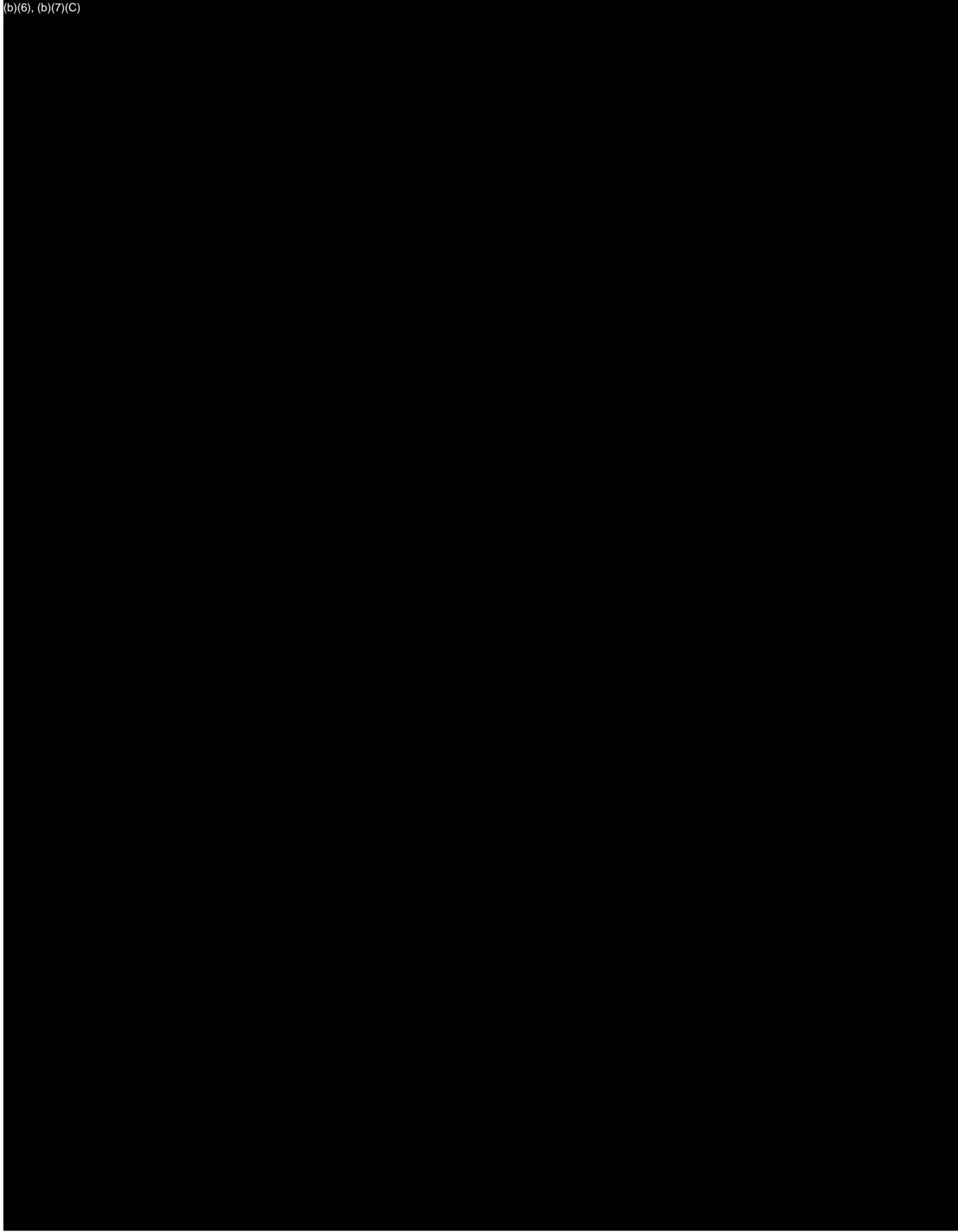
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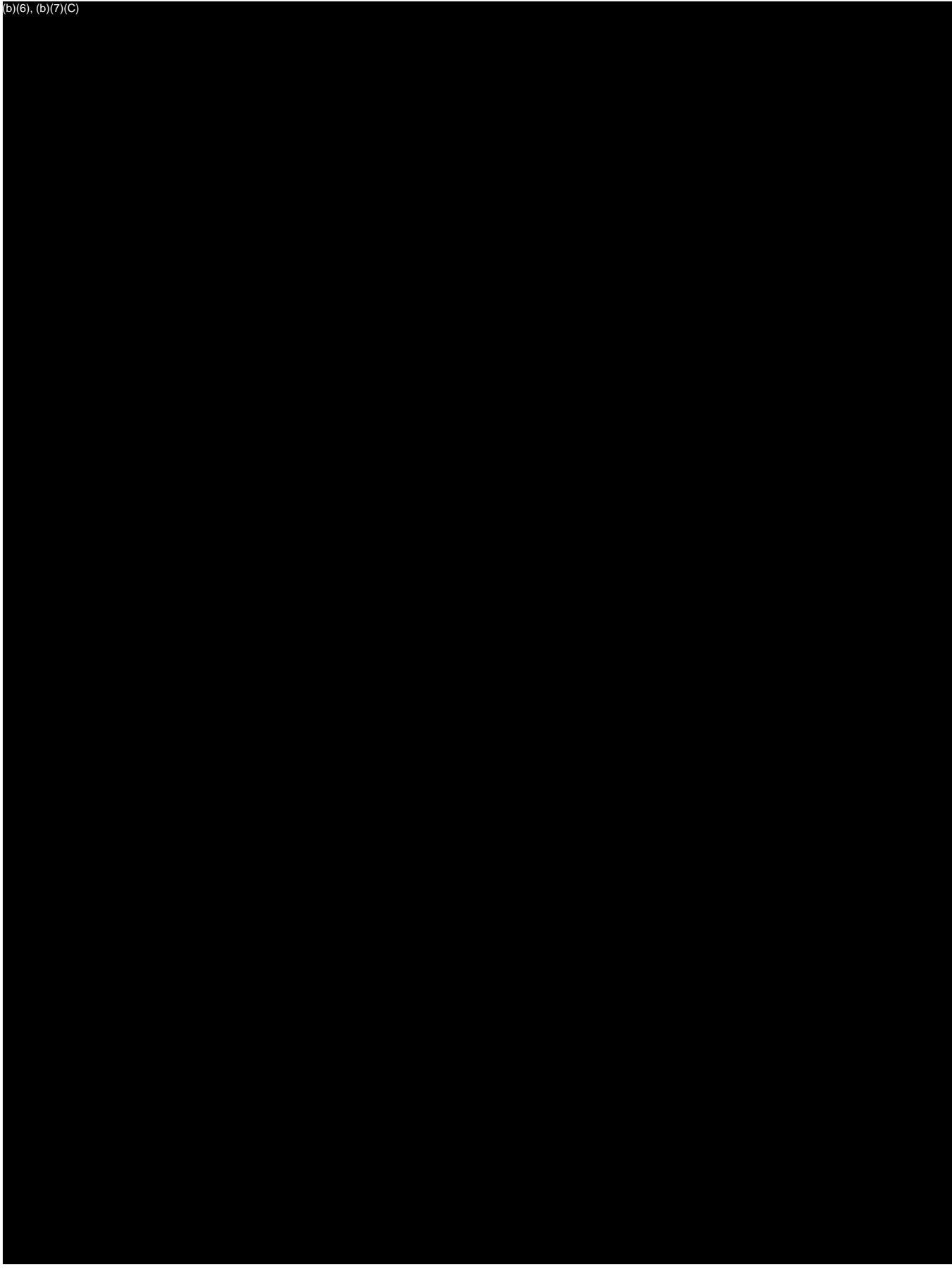
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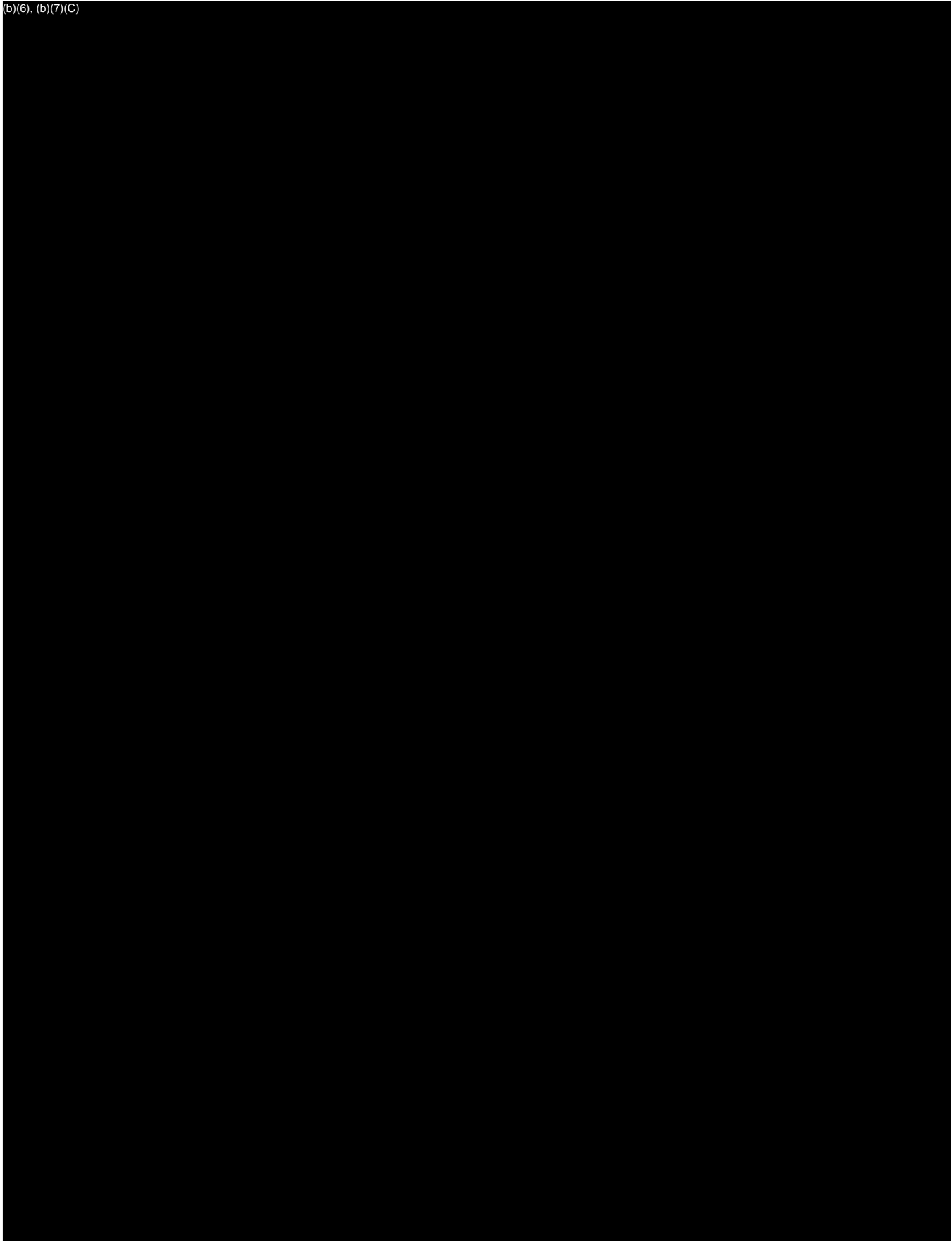
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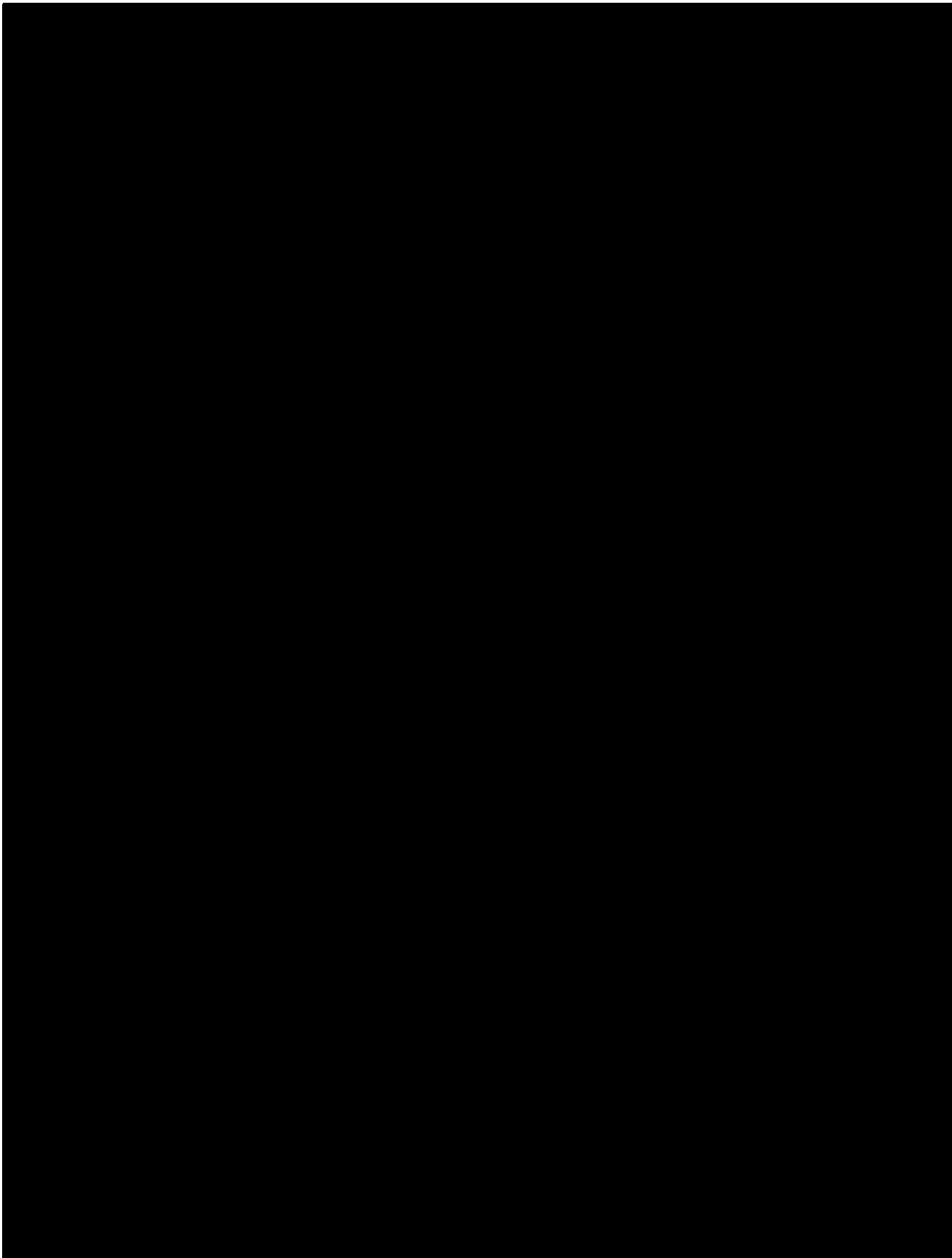


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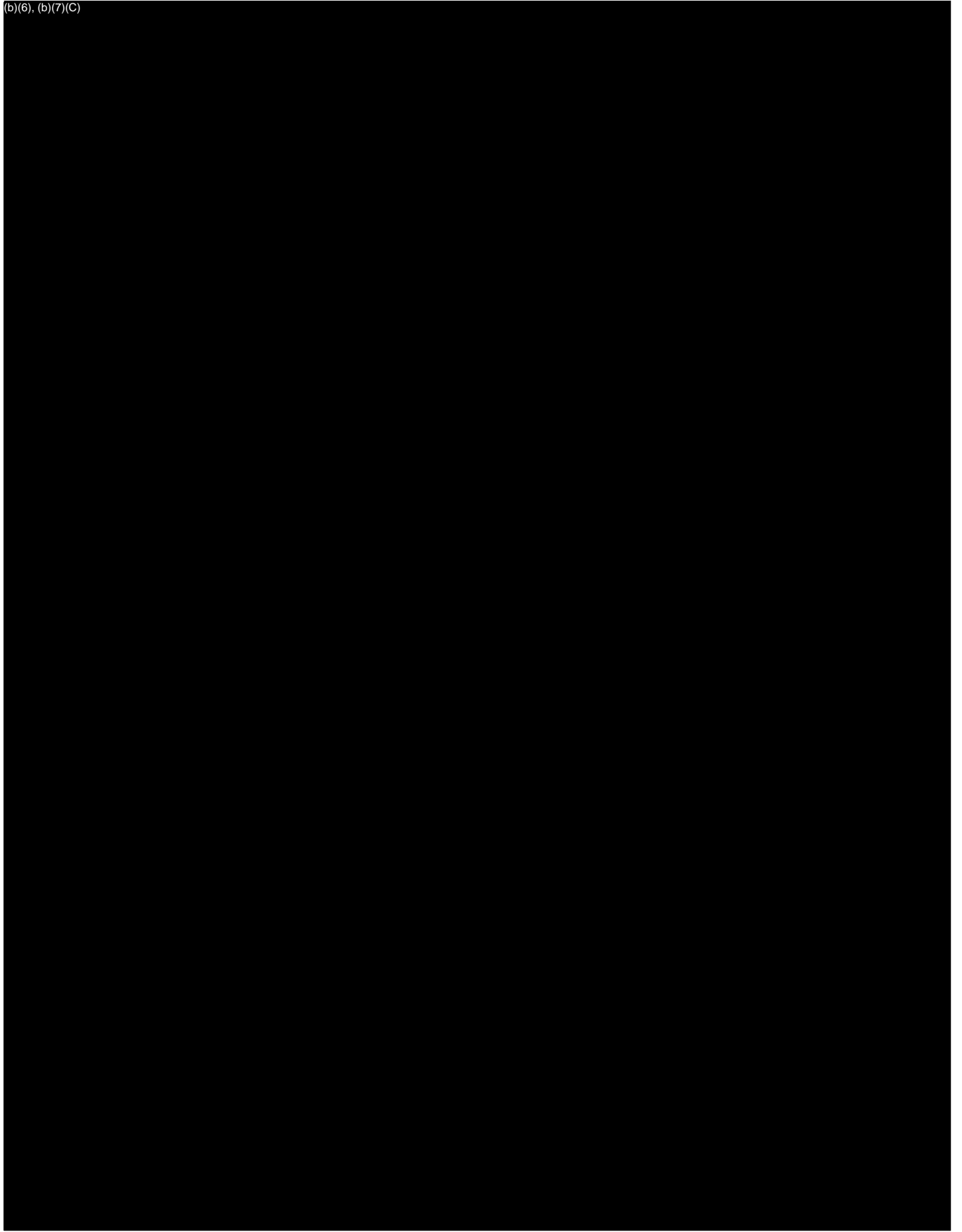


(b)(6), (b)(7)(C)

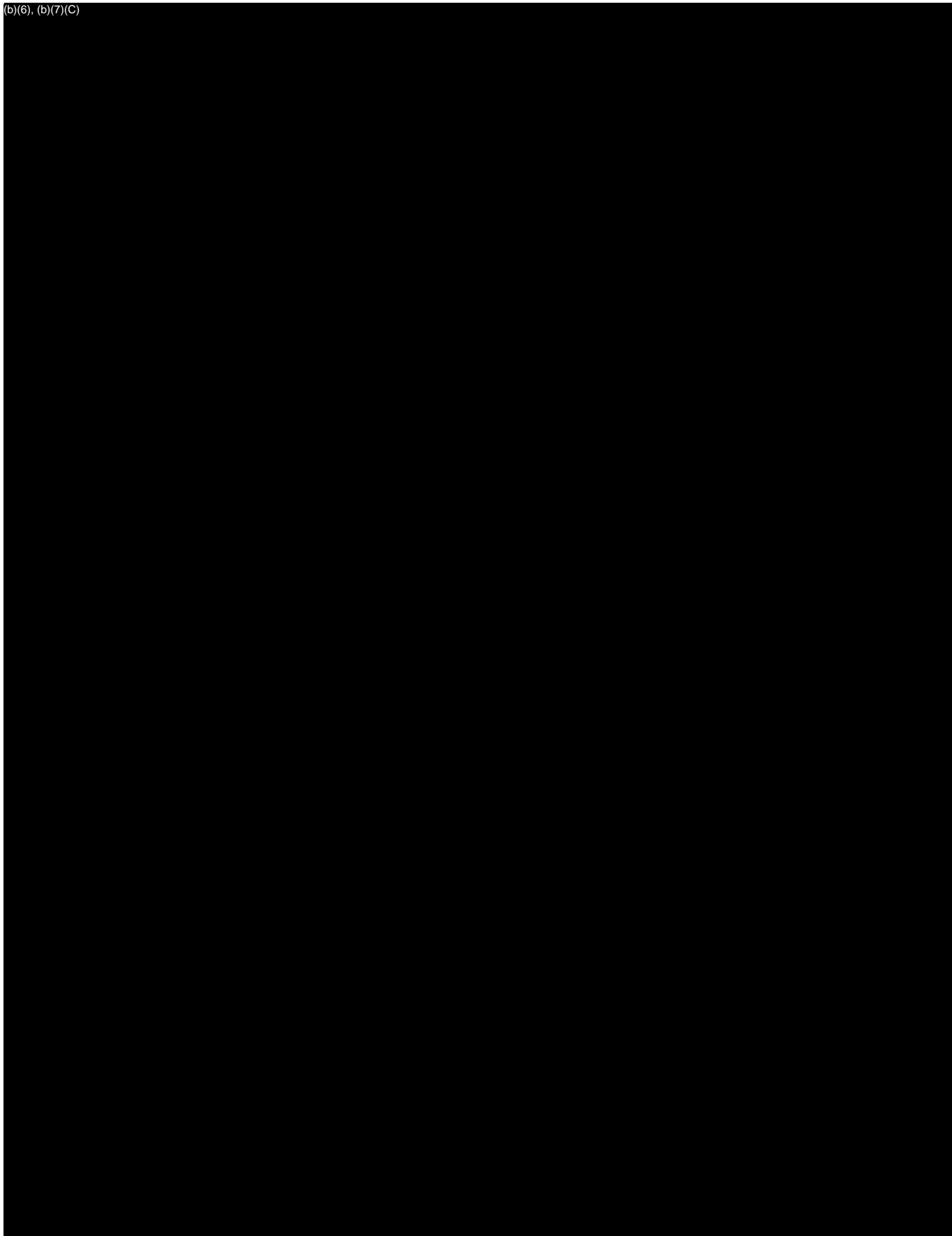




(b)(6), (b)(7)(C)



(b)(6), (b)(7)(C)



V. CONCLUSIONS

A. Mr. Blanchard **misused his position to induce a subordinate to provide him airline seat upgrades in violation of 5 CFR Section 2635.702.**

B. (b)(6), (b)(7)(C) [Redacted]

C. (b)(6), (b)(7)(C) [Redacted]

VI. RECOMMENDATIONS

A. **Provide a copy of this report to the Secretary of the Air Force.**

B. **Notify the Director, Office of Personnel Management, of the substantiated allegation.**

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Case 20130228-013055



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