



United States Department of State  
and the Broadcasting Board of Governors

*Office of Inspector General*

FEB 28 2012

Mr. Jeffrey Trimble  
Deputy Director  
Broadcasting Board of Governors  
330 Independence Avenue SW, Room 3360  
Washington, DC 20237

Dear Mr. Trimble:

Subject: Report on *Survey of Broadcasting Board of Governors Suspension and Debarment Process* (AUD/CG-12-24)

The Office of Inspector General (OIG), Office of Audits, conducted a survey of the Broadcasting Board of Governors (BBG) suspension and debarment process as part of its continuing effort to assist in improving operations and internal controls.

The objective of the survey was to determine the efficacy of BBG's suspension and debarment policies and procedures to ensure that BBG (1) does not solicit offers from, and award contracts to, contractors whose names are in the Excluded Parties List System (EPLS); (2) promptly reports, investigates, and refers, to the debarring official,<sup>1</sup> matters appropriate for that official's consideration; and (3) makes practical suspension and debarment decisions consistent with the principles of fundamental fairness.<sup>2</sup> (The survey's scope and methodology are detailed in Enclosure 1.)

During the survey, OIG determined that BBG did not have sufficiently detailed suspension and debarment policies and procedures. BBG officials stated that their copying of the information on debarment and suspension from the *Federal Acquisition Regulation*<sup>3</sup> (FAR) into BBG's International Broadcasting Bureau Manual of Operations and Administration was sufficient.

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<sup>1</sup> FAR 9.4, "Debarment, Suspension, and Ineligibility," defines "Debarring Official" as the agency head or a designee authorized by the agency head to impose debarment.

<sup>2</sup> FAR 9.406-3(b)(1) and 9.407-3(b)(1) require agencies to follow procedures that are "consistent with principles of fundamental fairness."

<sup>3</sup> FAR 9.4.

However, a review of the policy manual showed that the information in the manual contained minimal agency procedures for reporting, investigating, and referring contractors that performed poorly. Also, BBG officials stated that BBG had processed only one contractor suspension in the last 20 years and that it had had no debarments. Because BBG had processed only one suspension in 20 years, OIG was unable evaluate BBG's suspension and debarment decisions.

In soliciting and awarding procurements, BBG procurement officials stated that BBG staff performed some procedures to comply with FAR suspension and debarment requirements, including preventing prohibited parties from obtaining Federal contracts and grants by consulting the EPLS and by having contracting officers discuss contractor performance weaknesses with other contracting officers. However, OIG was unable to verify the extent of BBG's actions taken in this regard because it could not obtain a usable universe of contracts and grants from which to select a sample of procurements to test the effectiveness of BBG's efforts.

To test BBG's compliance in preventing prohibited parties from obtaining Federal contracts and grants, OIG, from June to September 2011, made multiple requests to obtain the universe of contracts and grants it needed to continue the survey. However, the information BBG provided was in a format that OIG could not review, as the data was extracted from financial software and BBG does not possess a contract data management system. Therefore, OIG was not able to use this information to obtain an effective universe from which to conduct its testing.

OIG also found that BBG did not record contractor performance information, such as contracts that were terminated for cause or default, in Federal automated procurement databases. Recording this information is significant because contractors performing poorly that were terminated for default or cause is a prime consideration in determining whether a referral to the suspension and debarment official is warranted if there is no historical evidence of the contractor's performance to report, investigate, or refer a contractor for either action. However, BBG did maintain a file of information on poorly performing contractors to prevent such contractors from gaining access to future BBG contract opportunities, as well as to provide this information to outside agencies if BBG were to be called for a reference.

Because of the lack of usable data available within the time allotted for the review and the lack of sufficiently detailed policies and procedures, the OIG team was unable to determine whether there was assurance that contracts and grants were awarded only to responsible sources and that the Government's interests were protected. Therefore, OIG concluded its fieldwork and is reporting the results it obtained during the survey.

Based on the survey, OIG is recommending that BBG strengthen suspension and debarment policies and procedures to cover its domestic and overseas procurement operations and that it record contractor performance information in Federal automated procurement databases for contracts that are terminated for cause or default. In its February 7, 2012, response (see Enclosure 3), BBG concurred with the report's two recommendations.

## Background

BBG is an independent Federal agency that supervises all U.S. Government-supported civilian international broadcasting. BBG staff provide the BBG Board with technical, professional, and administrative support, as well as strategic guidance and management of selected agency programs. BBG oversees the operations of the following:

- The International Broadcasting Bureau (IBB), which includes the worldwide broadcasting services of Voice of America and Office of Cuba Broadcasting.
- Three grantee organizations: Radio Free Europe/Radio Liberty, Radio Free Asia, and the Middle East Broadcasting Networks.
- BBG strategic planning and consolidated audience research program for the broadcasting entities.

Overall, IBB provides transmission services for all the broadcasters under BBG, and IBB's Office of Contracts is responsible for the administration of domestic contracts. That office plans, manages, develops, implements, executes, and administers a simplified acquisition process and contracts in excess of \$100,000 for supplies and services and a construction system worldwide.

The FAR<sup>4</sup> states, "Agencies shall solicit offers from, award contracts to, and consent to subcontracts with responsible contractors only." The purpose of this FAR requirement is to protect the Government's interest and minimize the loss of taxpayer dollars through contractor fraud and embezzlement. Suspensions and debarments are discretionary actions that agencies implement to protect the Federal Government by excluding contractors that commit fraud, behave unethically, or willfully fail to perform or have a history of failure to perform according to the terms of a contract from conducting business with the Federal Government.<sup>5</sup> In August 1989, the Federal Government established a Government-wide suspension and debarment policy applicable to procurement transactions by Executive Order 12689 and implemented through the FAR. The FAR<sup>6</sup> requires agencies to establish procedures for the prompt reporting, investigation, and referral of contractors that perform poorly to the debarring official for consideration.

According to the FAR,<sup>7</sup> suspension is an action taken by an agency's suspending official to exclude a person and/or entity from participating in Federal contracts for a temporary time period pending the completion of an agency investigation or "legal proceedings." Debarment is an action taken by the debarring official to exclude a person and/or entity from participating in Federal contract activities for a period of up to 3 years. Debarments are generally based on causes listed in the FAR that identify the grounds for debarment.<sup>8</sup> Excluding contractors from

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<sup>4</sup> FAR 9.402(a).

<sup>5</sup> FAR 9.402(b) states, "The serious nature of debarment and suspension requires that these sanctions be imposed only in the public interest for the Government's protection and not for the purposes of punishment."

<sup>6</sup> FAR 9.406-3, "Procedures."

<sup>7</sup> FAR 9.407-1, "General."

<sup>8</sup> FAR 9.406-2, "Causes for debarment."

participating in Federal contracts under a suspension or debarment requires agencies to identify those contractors in EPLS to protect other Government agencies from procurement losses. According to the FAR,<sup>9</sup> “Contractors debarred, suspended, or proposed for debarment are also excluded from conducting business with the Government as agents or representatives of other contractors.” (Additional information on causes for suspension and debarment actions as identified in the FAR<sup>10</sup> is presented in Enclosure 2.)

The EPLS is a Web site maintained by the General Services Administration (GSA) for the purpose of efficiently and conveniently disseminating information on parties that are excluded from receiving Federal contracts, certain subcontracts, and certain Federal financial and nonfinancial assistance and benefits.<sup>11</sup> In addition, according to the Department of State Acquisition Regulation,<sup>12</sup> “Contracting officers shall not award a contract to any of the entities listed on the Specially Designated Nationals (SDN) list,” which is shown on the Department of the Treasury’s Office of Foreign Assets Control Web site.<sup>13</sup>

### **Prior Audit Reports**

In a review of EPLS data for FYs 2006 to 2010 and suspension and debarment programs at 10 Federal agencies, the Government Accountability Office (GAO) reported the following in August 2011:<sup>14</sup>

Four of the agencies had active programs resulting in suspensions and debarments and six agencies had few or no suspensions or debarments. The four agencies with active programs had similar characteristics including dedicated program staff; detailed implementing guidance to supplement the FAR; and practices that encouraged an active referral process, including a step-by-step guide for compiling an action referral memorandum.

According to the GAO report, the most active suspension and debarment programs promoted a culture of acquisition integrity where suspension and debarment policies were understood by all agency staff. GAO recommended that the six agencies with programs that did not have suspension and debarment policies, procedures, and implementing guidance adopt the characteristics of the four agencies that had active programs. Five of the six agencies, including the Department of State, agreed with the recommendation. One agency disagreed with the recommendation, stating that its existing guidelines were sufficient. GAO disagreed with that agency’s position.

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<sup>9</sup> FAR 9.405, “Effect of listing.”

<sup>10</sup> FAR 9.406-2.

<sup>11</sup> The EPLS is provided as a public service by the General Services Administration pursuant to the provisions of 31 U.S.C. § 6101, note; 48 CFR 9.404; E.O. 12549 and E.O. 12689; and each agency’s codification of the Common Rule for Non-procurement suspension and debarment.

<sup>12</sup> Department of State Federal Acquisition Regulation 609.404-70, “Specially Designated Nationals List.”

<sup>13</sup> Department of the Treasury’s Office of Foreign Assets Control Web site at <[www.treas.gov/ofac](http://www.treas.gov/ofac)>.

<sup>14</sup> *Suspension and Debarment, Some Agency Programs Need Greater Attention, and Governmentwide Oversight Could Be Improved* (No. GAO-11-739, Aug. 31, 2011).

A February 2010 Department of Homeland Security (DHS) report<sup>15</sup> stated that DHS does have suspension and debarment policies and procedures but that DHS managers were reluctant to apply the policies and procedures against poorly performing contractors. The report stated, “The procurement officials prefer to use other administrative remedies to address poor contractor performance.” In addition, the report “identified 23 instances where contracts were terminated for default or cause but were not reviewed to determine whether a suspension and debarment referral was warranted.” The report concluded, “[R]eluctance to pursue suspension and debarment could put the department and the government at risk of continuing to conduct business with poorly performing contractors and may result in decreased productivity and increased cost.”

In an October 2009 report,<sup>16</sup> the U.S. Agency for International Development (USAID) OIG reported that USAID’s suspension and debarment program “included seven debarment actions and two suspension actions, but these actions were too few, and several of them were poorly executed.” According to the report, USAID’s actions “minimized the protection the [suspension and debarment] process should afford to the public interest.”

## **Results of Survey**

OIG found that BBG did not have sufficiently detailed suspension and debarment policies and procedures.<sup>17</sup> However, it was determined that BBG did have policies in the IBB Manual of Operations and Administration that mirror the FAR. BBG officials stated that they had processed only one contractor suspension in the past 20 years. However, OIG was unable to verify that contractor suspension or review any documentation showing that BBG had considered suspension or debarment actions over the past 3 years. In addition, BBG could not provide OIG with a useful universe of contracts and grants for domestic and overseas procurement actions in the form needed by the OIG team. Without more detailed policies and procedures and a useful universe to analyze, there may be an increased risk that contracts and grants could be awarded to contractors listed on the EPLS for poor performance or for one of the causes specified by the FAR.

### **Suspension and Debarment Policies and Procedures Lacking**

BBG did not have sufficiently detailed policies and procedures, detailed instructions, and detailed guidance that described procurement office responsibilities for suspension and debarment investigations, referrals, and the reporting of contractors that performed poorly. Since 1989, the BBG had processed only one suspension. However, none of the BBG officials OIG interviewed could remember the suspension or provide information on the incident.

A senior BBG procurement official stated that BBG staff involved with soliciting and awarding procurements did comply with suspension and debarment requirements contained in the FAR, such as preventing prohibited parties from obtaining Federal contracts and grants. Although the

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<sup>15</sup> *DHS’ Use of Suspension and Debarment Actions for Poorly Performing Contractors* (No. OIG-10-50, Feb. 2010).

<sup>16</sup> *Audit of USAID’s Process for Suspension and Debarment* (No. 9-000-10-001-P, Oct. 1, 2009).

<sup>17</sup> FAR 9.406-3.

FAR<sup>18</sup> prescribes the overall policies and procedures governing the suspension and debarment of contractors by agencies, it directs agencies to establish their own appropriate procedures to implement the FAR guidance.

BBG officials stated that they did not have detailed policies and procedures related to suspension and debarment of contractors that performed poorly but recognized the need to develop detailed policies and procedures. The Procurement Executive added that when his staff detected a contractor performing poorly, the office staff sent a cure notice to the contractor.<sup>19</sup> If the contractor took action to correct the deficiency, no further suspension or debarment action was taken. However, if the contractor did not cure or remedy the deficiency, BBG would cancel the contract for default.

Although BBG officials made statements regarding the checking of the EPLS and sending cure notices to contractors, BBG did not have easily verifiable electronic documentation to support checking the EPLS, the use of cure notices, or contract default actions, as BBG maintains this documentation in paper form in its individual contract files.

BBG officials stated at the beginning of OIG's survey that referencing FAR subpart 9-4 requirements in BBG's policy manual<sup>20</sup> was sufficient compliance with the FAR, since BBG had had only one suspension in 20 years. However, OIG's review of BBG's policy manual shows that the manual reiterates information contained in the FAR and contains minimal agency procedures for reporting, investigating, and referring contractors that perform poorly.

At the November 2011 exit conference, BBG procurement officials agreed that specific suspension and debarment policies and procedures based on FAR requirements were needed and were being drafted. The officials also stated that they would welcome information and examples from other agency suspension and debarment programs to assist in developing suspension and debarment procedures for BBG's domestic and overseas procurement operations.

**Recommendation 1.** OIG recommends that the Director, Broadcasting Board of Governors, strengthen worldwide suspension and debarment policies and procedures in compliance with Executive Order 12689 and implemented through the Federal Acquisition Regulation, subpart 9.4, "Debarment, Suspension, and Ineligibility."

**BBG Response and OIG Reply:** BBG concurred with the recommendation, and based on the response, OIG considers the recommendation resolved, pending further action. This recommendation can be closed when OIG reviews and accepts documentation showing that the worldwide suspension and debarment policies and procedures have been strengthened.

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<sup>18</sup> FAR 9.4.

<sup>19</sup> FAR 49.607 states that a cure notice is issued by the Government to inform the contractor that the Government considers the contractor's failure a condition that is endangering performance of the contract. The cure notice specifies a period of 10 days or more for the contractor to remedy the condition. If the condition is not corrected within this period, the cure notice states that the contractor may face the termination of its contract for default.

<sup>20</sup> International Broadcasting Bureau Manual of Operations and Administration, pt. IX, "Procurement," sec. 160, "Debarred, Suspended, and Ineligible Bidders."

## Contractor Performance Information Not Recorded in Federal Databases

While BBG had written policies for debarment and suspension, BBG did not have an active case referral process for the use of BBG officials in determining whether a contractor could be subject to suspension or debarment. BBG's Procurement Executive also stated that the office does not enter contractor performance information into the appropriate Federal databases because of cost and formatting and/or logistics reasons and that it does not have written policies and procedures to ensure that all pertinent contractor performance information is recorded in the appropriate databases. BBG's Procurement Executive also noted, however, that BBG is working to correct these omissions.

BBG officials acknowledged that for a number of reasons (fiscal and otherwise) they do not comply with the part of the FAR<sup>21</sup> that requires agencies to prepare an evaluation of contractor performance for each contract that exceeds the simplified acquisition threshold (\$150,000 in most cases)<sup>22</sup> when contract work has been completed. The FAR also requires that contractor performance information be documented annually when the contract period exceeds 1 year.<sup>23</sup> However, BBG began the process of complying with this requirement.

Regarding the documentation of contractor performance information, the February 2010 DHS report<sup>24</sup> states the following:

It is always in the government's best interest to be aware of a contractor's failure to perform. Recording the identity of poorly performing contractors and the rationale underlying termination decisions in agency and government-wide databases would increase the knowledge base of government procurement professionals, thereby reducing the risk of entering into contractual relationships with individuals and corporate entities that have histories of not performing in accordance with contract requirements.

**Recommendation 2.** OIG recommends that the Director, Broadcasting Board of Governors (BBG), comply with the requirements of *Federal Acquisition Regulation* subpart 42.1502(b) and develop procedures to ensure that all pertinent contractor performance information is recorded in BBG's automated procurement database when it becomes available and in other appropriate Government-wide databases that track and monitor contractor performance.

**BBG Response and OIG Reply:** BBG concurred with the recommendation, and based on the response, OIG considers the recommendation resolved, pending further action. This recommendation can be closed when OIG reviews and accepts documentation showing that BBG has developed procedures pertaining to the recording of pertinent contractor performance information.

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<sup>21</sup> FAR 42.1502(b), Policy."

<sup>22</sup> "Simplified acquisition threshold" is defined in FAR 2.101, "Definitions."

<sup>23</sup> FAR 42.1502(a).

<sup>24</sup> DHS Report No. OIG-10-50.

Please provide your response to the report and information on actions taken or planned for Recommendations 1 and 2 within 30 days of the date of this letter. Actions taken or planned are subject to followup and reporting in accordance with the enclosed compliance response information.

OIG appreciates the cooperation and assistance provided by your staff during this audit. If you have any questions, please contact Evelyn R. Klemstine, Assistant Inspector General for Audits, at (202) 663-0372 or Richard Astor, Director, Contracts and Grants Division, at (703) 284-2601 or by email at [astorr@state.gov](mailto:astorr@state.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "H. W. Geisel", written in a cursive style.

Harold W. Geisel  
Deputy Inspector General

Enclosures: As stated.

## Scope and Methodology

To determine whether the Broadcasting Board of Governors (BBG) had an effective suspension and debarment program, the Office of Inspector General (OIG) reviewed applicable laws and regulations concerning suspension and debarment procedures. OIG also met with BBG officials from the Office of Contracts, the Office of the Chief Financial Officer (CFO), the Office of the General Counsel, and the Office of the International Broadcasting Bureau (IBB). The Procurement Executive resides in the Office of Contracts. OIG also reviewed other Federal agency suspension and debarment audit reports.

To determine the degree of compliance with suspension and debarment requirements contained in *Federal Acquisition Regulation* (FAR) subpart 9.4, “Debarment, Suspension, and Ineligibility,” OIG planned to take the following actions:

- Determine whether contracts and grants awarded between 2008 and 2010 were awarded to entities whose names were on the Excluded Parties List System (EPLS) or the Specially Designated Nationals (SDN) list and that therefore should have been precluded from receiving contracts and grants from BBG.
- Determine the adequacy of reporting, investigating, and referring to the debarring official matters appropriate for that official to consider for possible suspension and debarment actions.
- Identify suspension and debarment policies and procedures of other Federal agencies to find best practices that could be applicable to and enhance BBG’s program.

OIG was unable to advance to the audit phase of the audit because BBG did not provide useable data from which to select a sample of contracts and grants to review and to complete the survey steps. During initial fieldwork, OIG requested contract and grant information during meetings with BBG officials, by email, and by telephone. Significant delays occurred when procurement and accounting officials stated on several occasions that they needed approval from senior-level management of IBB to provide OIG with the information requested. When BBG did provide the information, it was in a format that was not compatible with OIG’s request and could not be verified. The purpose of OIG’s proposed sample was to select procurement files to determine whether there was adequate evidence that BBG procurement officials had consulted the EPLS and the SDN before signing worldwide contract and grant awards.

As of September 16, 2011, approximately 3 months from the start of OIG’s work, BBG had not provided the requested contract and grant information. However, BBG requested a delay in providing that information until after BBG’s year-end financial work was complete. Because OIG was unable to obtain a usable list of contracts and grants, OIG concluded its fieldwork and decided to report on the results obtained during the survey. OIG notified BBG of this action, and on November 17, 2011, OIG briefed BBG officials on the survey results.

OIG attempted to conduct a performance audit in accordance with government auditing standards. Those standards require that the audit be planned and performed to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objectives. However, OIG could not obtain sufficient usable documentation to perform tests and other auditing procedures to carry out the audit steps described. Therefore, the findings and recommendations in this report are based primarily on observations and discussions with BBG officials and audit reports from the Department of Homeland Security, the Government Accountability Office, and the U.S. Agency for International Development. If OIG had completed the audit procedures as planned, other matters may have come to its attention and been reported.

## **Review of Internal Controls and Automated Systems**

During OIG's review of internal controls, OIG could not determine whether contracts and grants were awarded to responsible contractors and subcontractors. OIG also could not determine whether contracts awarded between 2008 and 2010 were awarded to entities whose names were on the EPLS or the SDN and therefore should have been precluded from receiving contracts and grants from BBG. In addition, OIG could not determine the adequacy of reporting, investigating, and referring, to the debaring official, matters appropriate for that official to consider for possible suspension and debarment actions.

BBG did not provide usable data for all contract and grant actions for 2008 to 2010. The requested universe was to include contract vendor names and locations; grants awarded and amounts; and information on vendors terminated for cause, default, or the convenience of the Government. Procurement Executive personnel stated that BBG did not have an automated database from which to download this information. Instead, Procurement Executive personnel obtained a listing of contract obligations from the Chief Financial Officer, which uses financial application software that produces obligation and expenditure reports. However, this financial system may not provide all contracts and grants when the contractor's address is omitted or no expenditures have been made.

On June 21, 2011, BBG sent the listing provided by the Procurement Executive to OIG. The listing showed 23,288 contract line actions for 2008 to 2010. Of the 23,288 contract actions, 1,456 transaction lines had "zero" obligation amounts; 1,998 had credits or negative balances; and 19,834 had positive balances ranging from \$1 to \$11,288,691. On August 12, 2011, BBG resubmitted that same listing to OIG, and it had about 97,000 contract line actions. While OIG's additional requests had expanded the universe from that which was initially requested, BBG procurement officials could not explain why contract line actions had increased so significantly in almost 2 months, and it could not adequately explain the impact the balances had on identifying the contracts and grants universe. Because of the inconsistencies in the financial information not directly related to contracts and grants in the listings, OIG determined that the universe from which to select a sample of domestic and overseas contracts and grants for review was unusable.

## **Use of Computer-Processed Data**

OIG did not rely on BBG's computer-processed data because BBG did not have an automated procurement database and did not input required contractor performance information into Federal automated databases. Also, BBG provided financial data instead of procurement information to OIG.

## **Summary of Causes for Suspension or Debarment as Described in the Federal Acquisition Regulation**

As described in the *Federal Acquisition Regulation*,<sup>1</sup> suspensions are temporary in nature and are used to protect the Federal Government until investigations and any ensuing legal proceedings that could lead to debarment actions are completed. In no instance may a suspension last longer than 18 months unless legal proceedings have been initiated within that period. Causes for suspension actions include adequate evidence of the following:

- Commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public contract or state contract.
- Commission of embezzlement, theft, forgery, bribery, falsification, or destruction of records; making false statements; tax evasion; violating federal criminal tax laws; or receiving stolen property.
- Commission of any other offense indicating a lack of business integrity or business honesty that seriously and directly affects the present responsibility of a Government contractor or subcontractor.
- Any other cause of so serious or compelling a nature that it affects the present responsibility of a Government contractor or subcontractor.

Debarments, on the other hand, generally do not exceed 3 years but can be extended if the debarring official determines that it is in the Government's best interest. Causes for debarment actions include the following:

- Conviction of or civil judgment for fraud, violation of antitrust laws, embezzlement, theft, forgery, bribery, false statements, or other offenses indicating a lack of business integrity.
- Violation of the terms of a government contract or subcontract so serious as to justify debarment, such as a willful failure to perform in accordance with the terms of one or more contracts or a history of failure to perform, or of unsatisfactory performance of one or more contracts.
- Noncompliance with employment provisions of the Immigration and Nationality Act.
- Any other cause of so serious or compelling a nature that it affects the present responsibility of the contractor or subcontractor.

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<sup>1</sup> FAR 9.406-2, "Causes for debarment."

Broadcasting Board of Governors

INTERNATIONAL BROADCASTING BUREAU



February 7, 2012

Mr. Harold W. Geisel  
Deputy Inspector General  
Department of State

Dear Mr. Geisel:

This is in response to the e-mail from Mr. Richard Astor, dated February 3, 2012, regarding the Office of Inspector General (OIG), Office of Audits revised draft Report on the Survey of Broadcasting Board of Governors Suspension and Debarment Process.

The Broadcasting Board of Governors (BBG) has reviewed the revised draft report and concurs with the recommendations noted. However, BBG's Office of Contracts has identified a typographical error at footnote 21. The proper reference is FAR 42.1502(b).

We thank you for your inclusion of our comments and the opportunity to further respond to the draft report.

If you have any questions, please feel free to contact [REDACTED] or (b) (6) [REDACTED] IBB Office of Performance Review at [REDACTED]

Sincerely,

A handwritten signature in black ink, appearing to read "Richard M. Lobe".

Richard M. Lobe  
Director