

ANDREA K. GRIMSLEY, *U.S. Department of Homeland Security*

Andrea K. Grimsley served as the chief of the Headquarters General Contracts Branch for the U.S. Immigration and Customs Enforcement (“ICE”) Office of Procurement of the Department of Homeland Security (“DHS”) from April 29, 1996 until her retirement on January 31, 2004.¹ In that capacity, she had primary authority for oversight and procurement activities.² On February 2, 2004, after retiring from federal service, Ms. Grimsley began working as an account executive with FedBid, a private company that provides web-based procurement services to government agencies.³

Ms. Grimsley negotiated her post-government employment with FedBid starting in late November 2003, while still employed by DHS.⁴ In late November 2003, Ms. Grimsley sought advice from the ethics office at ICE about a potential conflict of interest relating to her employment negotiations with FedBid.⁵ After discussions with that office, Ms. Grimsley sent an e-mail to an ethics officer stating she would not participate in any matters involving FedBid.⁶

Notwithstanding this email, Ms. Grimsley continued to participate in matters involving FedBid from late November 2003 through February 2, 2004.⁷ In November 2003, she was assigned responsibility as the contracting officer for DHS’s acquisition of 65,000 pistols to be distributed among all DHS divisions, including ICE.⁸ On January 6, 2004, Ms. Grimsley directed one of her subordinates to include the requirement that all bidders register with FedBid on the Request for Information for the handgun contract.⁹ Two days later, FedBid offered Ms. Grimsley a position.¹⁰ On January 13, 2004, ICE issued a Request for Information from potential handgun contractors that required offering contractors to submit their pricing quotes through

¹ U.S. v. Grimsley, Crim No.05-499M, Administrative Settlement Agreement (Document 12-5), p. 1 (D.D.C. Oct. 6, 2005). (Exhibit 1)

² U.S. v. Grimsley, Crim No.05-499M, Misdemeanor Information, ¶ 2 (D.D.C. Sept. 16, 2005) [hereinafter “Information”]. (Exhibit 2)

³ Id., ¶ 11f.

⁴ Id., ¶ 11.

⁵ Id., ¶ 10.

⁶ Information, ¶ 10.

⁷ Id., ¶ 11.

⁸ Id., ¶¶ 6-7.

⁹ Id., ¶ 11a.

¹⁰ Information, ¶ 11c.

FedBid.¹¹

On September 16, 2005, Ms. Grimsley was charged with a financial conflict of interest.¹² She reached a plea agreement with the government¹³ and was sentenced to one year of probation, a \$1,000 fine and 40 hours of community service.¹⁴

¹¹ Id., ¶ 9.

¹² Id.

¹³ U.S. v. Grimsley, Crim No.05-499M, Plea Agreement (D.D.C. Sept. 25, 2006). (Exhibit 3)

¹⁴ Former Department of Homeland Security Official Sentenced on Guilty Plea to Conflict of Interest Charge, *US Fed News*, December 9, 2005. (Exhibit 4)