



**SIGAR**

Office of the Special Inspector General  
for Afghanistan Reconstruction

June 13, 2014

Mr. Steven L. Arnold  
Director of the Board, Ecolog USA  
Ecolog, Inc.  
9595 Six Pines Drive, Suite 8210  
The Woodlands, TX 77380

Dear Mr. Arnold,

The Office of the Special Inspector General for Afghanistan Reconstruction (SIGAR) was established by Congress to prevent and detect waste, fraud, and abuse in programs and operations relating to the reconstruction of Afghanistan. As part of an initiative undertaken by my office to combat human trafficking, SIGAR special agents have been participating in enforcement sweeps and conducting interviews with Third Country National (TCN) workers employed by the U.S. military in Afghanistan.

SIGAR agents in Kandahar, for example, recently uncovered an illicit scheme involving a Sri Lankan supervisor working on a U.S. base who was extorting cash payments from his TCN subordinates. As a direct result of SIGAR's inquiry, that supervisor was fired and deported, and the company involved reimbursed the extortion victims. SIGAR agents also have been conducting inquiries relating to reports of human trafficking at multiple U.S. military bases in Afghanistan.

Given SIGAR's ongoing efforts, I was disturbed to learn that some Department of Defense (DOD) contractors, subcontractors, and their recruiters allegedly may be engaging in or knowingly permitting the use of improper and deceptive recruitment practices in connection with contracts and subcontracts performed for the U.S. Army's Logistics Civil Augmentation Program (LOGCAP) in Afghanistan.

A recent "Fault Lines" documentary broadcast by the Al Jazeera television network raised troubling allegations concerning your company's recruitment of TCNs for work at U.S. military bases in Afghanistan. These TCNs, who are mainly from India, Nepal, and other parts of South Asia, reportedly paid a few hundred to several thousand dollars each to recruiters who supply foreign workers to Ecolog, to obtain jobs at U.S. military bases.

Such recruiting fees are prohibited by 22 U.S.C. § 7104(g), Joint Contracting Command Iraq/Afghanistan Clause 952.222-0001, and the zero-tolerance policy regarding trafficking in persons outlined at FAR 22.1703 and Executive Order 13627. Moreover, the documentary alleged that many of these foreign workers are housed in overcrowded conditions for long periods of time by recruiters in Dubai or elsewhere, prior to being transferred to jobs at U.S. military bases in Afghanistan.

My office has interviewed workers' advocates and lawyers who indicate that TCN workers often borrow substantial sums of money at high interest rates in their home countries in order to pay these recruitment fees. In some cases, the substantial sums that the TCN workers borrow to pay these fees will take many months of work to pay back. The high levels of indebtedness that often result may make it virtually impossible for these TCNs to leave their jobs.

Officials representing Fluor, one of the prime contractors for which Ecolog recruits workers in Afghanistan, have told SIGAR investigators that more than 2,400 of these TCN workers—who were interviewed at random—reported to company officials that they paid such recruiting fees. Ecolog employees working at U.S. bases in Afghanistan have also reported to SIGAR agents that they have paid recruiting fees.

SIGAR special agents in Afghanistan have gathered information on allegations of other improper recruitment practices as well as mistreatment of TCNs working on U.S. military bases. To aid SIGAR in its inquiry, please provide the following information and related documents:

1. Please identify and provide copies of all Ecolog policies addressing human trafficking, and describe all efforts by Ecolog to detect and deter trafficking in connection with work on LOGCAP.
2. Please identify which Ecolog officials are accountable for your company's compliance with federal laws and regulations against human trafficking.
3. Please identify any investigative process Ecolog undertakes when it finds evidence of human trafficking violations or related abuses involving TCNs.
4. Please provide all records of Ecolog disclosing evidence of human trafficking to a contracting officer or other U. S. Government official. This response should include any records of Ecolog taking disciplinary action against a subcontractor, recruiter, employee, or agent for human trafficking violations.
5. Please provide all records of communications between Ecolog and Fluor, DynCorp, or any other entity relating to the Al Jazeera network documentary "Fault Lines: America's War Workers." Records responsive to this request include, but are not limited to, e-mails, memoranda, letters, notes from telephone conversations, and any recordings or minutes made of meetings between Ecolog, Fluor, DynCorp and any other person, including any civilian or military employee of the U.S.
6. Please list all recruitment firms which Ecolog uses to recruit TCNs for work in Afghanistan, the countries where these recruiters operate, and all efforts by Ecolog to ensure that these recruiters comply with federal laws against human trafficking.
7. Please identify any instances of TCN employees recruited directly by Ecolog, or through a recruiter used by Ecolog, who were found to have been paid a different salary than that promised by the recruiter, or were sent to a different job location than that for which they were recruited.
8. Please provide the number of TCN employees who have worked for Ecolog and/or its subcontractors in support of LOGCAP task orders in Afghanistan who were hired by Ecolog directly, and the number who were hired through subcontracts or by payments to independent recruiters.
9. Please provide the total number of TCNs Ecolog has recruited to work on contracts supporting U.S. and coalition operations in Afghanistan and the number of recruits that remain there as of June 13, 2014.
10. Please provide any records of trafficking complaints against Ecolog in the past two years, for any issues, including but not limited to, improperly restricting employee access to immigration and identification documents; and refusing or failing to pay return travel costs at the end of an employment contract. Include any complaints, and their resolution, that Ecolog has received through a company hotline or reported to Ecolog by any other means.

11. Please make available for inspection all pay records for Ecolog's TCN workers in Afghanistan for the past three years.
12. Please provide the locations and names of any foreign worker holding facilities where TCNs recruited by your firm or its contract recruiters are housed. What is the longest amount of time that any TCN workers have been housed in these facilities before being dispatched to jobs in Afghanistan? Who inspects these facilities and are records kept of such inspections? What are your firm's policies for the proper care and feeding of these TCN workers?

Please respond in writing to this request by June 27, 2014. Thank you in advance for your cooperation. These requests are made pursuant to the Inspector General Act of 1978, as amended, and section 1229 of the National Defense Authorization Act for Fiscal Year 2008, as amended.

Should you have any questions or need additional information, please have your staff contact Jack Mitchell, Director of Special Projects at [REDACTED] or [REDACTED], or William Gaertner, Associate General Counsel, at [REDACTED] or [REDACTED].

Sincerely,



John F. Sopko  
Special Inspector General  
for Afghanistan Reconstruction

CC:

Linda Dixon, CONUS Program Manager  
Combating Trafficking in Persons Task Force  
U.S. Department of Defense

Sam Yousef, CONUS Program Manager  
Combating Trafficking in Persons Task Force  
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