NOMINATIONS OF PARISA SALEHI AND BRIAN MICHAEL TOMNEY

HEARING
BEFORE THE
COMMITTEE ON
BANKING, HOUSING, AND URBAN AFFAIRS
UNITED STATES SENATE
ONE HUNDRED SEVENTEENTH CONGRESS
FIRST SESSION
ON
NOMINATIONS OF:
PARISA SALEHI, OF THE DISTRICT OF COLUMBIA, TO BE INSPECTOR GENERAL, EXPORT-IMPORT BANK
BRIAN MICHAEL TOMNEY, OF VIRGINIA, TO BE INSPECTOR GENERAL, FEDERAL HOUSING FINANCE AGENCY

DECEMBER 7, 2021

Printed for the use of the Committee on Banking, Housing, and Urban Affairs

Available at: https://www.govinfo.gov/
NOMINATIONS OF PARISA SALEHI AND BRIAN MICHAEL TOMNEY

TUESDAY, DECEMBER 7, 2021

U.S. SENATE,
COMMITTEE ON BANKING, HOUSING, AND URBAN AFFAIRS,
Washington, DC.

The Committee met at 10 a.m., via Webex and in room 538, Dirksen Senate Office Building, Hon. Sherrod Brown, Chairman of the Committee, presiding.

OPENING STATEMENT OF CHAIRMAN SHERROD BROWN

Chairman BROWN. The Senate Committee on Banking, Housing, and Urban Affairs will come to order. This hearing is in the hybrid format. Our witnesses are in person. Members have the option to appear either in person or virtually, or even both if they choose.

The Committee meets today to consider two nominations, Parisa Salehi to be Inspector General of the Export-Import Bank and Brian Tomney to be Inspector General of the Federal Housing Finance Agency. We congratulate the nominees and thank them for appearing here today and for their willingness to serve in these important roles. I also want to welcome their families and friends in attendance and I’ve met them, and those watching from home, and each nominee, certainly feel free at the beginning or during your testimony to introduce family members, either here or watching from somewhere else, by name.

It is so important that the Biden administration is working to fill inspectors general vacancies. These positions are vital to making our Government work for people, and to ensuring tax dollars are put to good use for the people whom we serve.

The Trump administration took unprecedented steps—unprecedented in the sense that Presidents of neither party had done this in the past—to undermine IGs across the Executive branch. They either sidelined them, or fired them without cause, simply for doing their jobs, for showing independence, which is their job, and pursuing the facts, which is also their job.

Through audits, evaluations, and investigations, inspectors’ general offices play pivotal roles in uncovering abuse, waste, and fraud, ensuring American tax dollars are protected.

The nominees today possess the independence, honesty, and integrity—qualities we all want and expect in an inspector general—things they need to take on these critical roles. And both nominees appearing before us are clearly qualified.

Ms. Salehi currently serves as the Chief of Staff to the Inspector General of the Department of State. She assists the IG on enter-
prise risk management and oversees the Congressional and public affairs sections of the IG office. Prior to joining State, she served in the USAID inspector general office.

Previously, Ms. Salehi spent more than 4 years at Ex-Im Office of Inspector General, serving in various roles, including as Acting Inspector General from 2018 to 2019. If confirmed, she would be rejoining an office she is familiar with, and her experience with the bank’s charter and its operations will enhance her office’s work.

When she served as the Acting Ex-Im Inspector General, my office found that she was very responsive to requests when we needed additional information concerning her office’s investigations and reports.

Ex-Im, as we know, is vital to manufacturers in Ohio and Montana and Pennsylvania and throughout the country. It will be Ms. Salehi’s job to help ensure that the bank works efficiently. She will help the bank comply fully with its charter and other statutory requirements. I believe she is well prepared to step into this job immediately.

Welcome to the Committee.

From 2006 to 2017, Mr. Tomney served in various roles at DOJ. From 2006 to 2009, he served as a trial attorney in DOJ’s criminal division, where he investigated drug trafficking and narco-terror organizations. From 2009 to 2014, Mr. Tomney served as Counsel for Rule of Law in the Office of the Deputy Attorney General, where he engaged with teams of Federal prosecutors and attorneys in efforts to root out corruption and support the rule of law in Afghanistan and Iraq. He went on to serve in several roles, including Assistant Deputy Attorney General.

Mr. Tomney has a proven commitment to service, even in the toughest situations. Early in his career he spent more than a decade as a paramedic and a firefighter. He will bring those same values with him to this job, ensuring that FHFA is working for all homeowners and all renters.

Welcome to the Committee, Mr. Tomney. We are glad you are here today too.

Thank you to both of you for your willingness to serve. I look forward to your testimonies today.

Ranking Member Toomey.

OPENING STATEMENT OF SENATOR PATRICK J. TOOMEY

Senator Toomey. Thank you, Mr. Chairman. Ms. Salehi and Mr. Tomney, welcome to both of you and your families. I commend you both for your commitment to public service and your willingness to serve in these important roles to which you have been nominated.

Mr. Tomney, if confirmed, you will have a challenging job. The GSEs led us into the 2008 financial crisis through their excessive risk taking, and Congress established FHFA as a tough regulator to ensure that never happened again. But instead of being the cop on the beat, the Biden administration seems intent on turning FHFA into a coconspirator with the GSEs.

FHFA has taken a number of troubling steps to extend credit to risky borrowers and undermine the GSEs’ financial condition. It has proposed reductions in the GSEs’ capital requirements, lowered guarantee fees and has said it is considering further cuts, sus-
pended restrictions on the GSEs' risk layering and acquisitions of investor and second home loans, relaxed the GSEs' underwriting requirements, and replaced much of FHFA's senior leadership.

Meanwhile, housing prices, of course, have skyrocketed an astonishing 18.5 percent in just the last 12 months. So I think it is a question of when, not if, these good times for the housing market come to an end, and I worry that FHFA’s enabling of risky lending, together with the Administration’s total disinterest in recapitalizing the GSEs through outside private capital, has placed the GSEs on a path that could well lead to another round of taxpayer bailouts.

Mr. Tomney, if that were not already enough, your job will be made more challenging by an Administration with no discernable housing policy besides giving mortgages to as many borrowers as possible with little regard to their ability to repay.

Housing is expensive, in part, because our housing policy subsidizes demand while ignoring supply constraints. Our Democratic colleagues’ reckless tax-and-spend bill makes little effort to increase housing supply.

The Senator Schumer earmark, or the “Schu-mark,” as I call it, and as I discussed at the October 21st hearing, would spend up to $40 billion renovating New York City’s existing public housing. Much of the other housing funds would go to imprudent downpayment assistance and rental vouchers that add further to housing demand. The bill even creates an astonishing invitation to mortgage fraud by making $15 billion available to borrowers who sign an attestation, truthfully or not, that they are, quote, “first-generation homebuyers,” end quote. Amazingly, you can qualify so long as your parents do not currently own a home and you have not owned a home in the last 3 years. So much for “first generation” homebuyer.

We need to try something different than the same housing policies that caused the 2008 financial crisis. To that end, in March I proposed principles to guide housing finance reform discussions. The Administration, however, has shown no interest in real reform, and even missed a September 30th deadline to report on its plan.

Mr. Tomney, given the path the Administration has put us on, I suspect you might soon be investigating how we so eagerly doubled down on 50 years of failed housing policy and thereby predictably led the GSEs into what could be another round of taxpayer bailouts.

Now turning to Ex-Im. Ex-Im claims that it only takes risks that private lenders are unable or unwilling to take. We should stop right there and ask ourselves: If private lenders are unwilling or unable to take a risk, why should taxpayers be forced to take that risk?

Yet, at the same time, Ex-Im also claims it only makes safe bets. It is obviously impossible to do both. Ex-Im cannot only take transactions so risky that no one else will do them, and at the same time only be doing safe transactions. The fact is Ex-Im wins business by systematically underpricing the risk it takes. That is why borrowers go to Ex-Im instead of any number of private lenders that will not offer deals on the same terms as Ex-Im will. That is why
our largest banks go to Ex-Im for loan guarantees. The Ex-Im terms are too good to be true, at least in the private sector.

And it is important to note that the vast majority of American exports get done without Ex-Im support. We have reviewed annual export data from 2007 through 2020. In that period, the highest percent of U.S. exports using Ex-Im financing was in 2012, and it was 2.3 percent. And that was when Ex-Im had everything going for it. It was fully operational, had a quorum on its board, and it had not reached its lending limit.

The reality is we are the world's second-largest exporter of goods behind only China, we lead the world in value-added exports, and we do it almost entirely without Ex-Im financing.

Not only is Ex-Im financing generally not needed, but it is often nothing more than crony capitalism providing taxpayer-financed subsidies to some of the world's largest companies who have plenty of access to private capital. Ex-Im's recent deal guaranteeing an $82 million loan from JPMorgan to Qantas for the purpose of buying jet engines from GE is just one example.

Generally, the same giant lenders, exporters, and foreign companies—often State-owned—benefit from Ex-Im while taxpayers take the risk. There is also a history of waste, fraud, and abuse at Ex-Im. Ex-Im’s IGs have identified numerous concerning practices at the bank over the years. If confirmed, Ms. Salehi will have the important responsibility to serve as an independent watchdog.

Mr. Chairman, I look forward to hearing from today’s nominees.

Chairman BROWN. Thank you, Senator Toomey.

Would witnesses please rise and raise your right hand.

Do you swear or affirm that the testimony you are about to give is the truth, the whole truth, and nothing but the truth, so help you God?

Ms. SALEHI. I do.

Mr. TOMNEY. I do.

Chairman BROWN. Do you agree to appear and testify before any duly constituted committee of the Senate?

Ms. SALEHI. I do.

Mr. TOMNEY. I do.

Chairman BROWN. Thank you. Please be seated.

I welcome you both to the Committee. As I said, if you would like to introduce family and friends, proceed.

Ms. Salehi, please begin your testimony. Thank you.

STATEMENT OF PARISA SALEHI, OF THE DISTRICT OF COLUMBIA, TO BE INSPECTOR, EXPORT-IMPORT BANK

Ms. SALEHI. Thank you, Chairman Brown, Ranking Member Toomey, and Members of the Committee. I am honored to appear before you today as the President’s nominee to be the Inspector General of the Export-Import Bank of the United States.

I would not be here today without the generous support of my family, friends, and colleagues. I would particularly like to recognize my mother, whose hard work and determination has afforded me many opportunities. She grew up far away from this free land, in a place where she was legally required to get her husband’s permission to do many simple things, like travel. Through selfless acts she ensured that her kids would have better and brighter life
choices than the ones available to her. I would also especially like to thank my partner, Burk, who is here with me today, and has been supportive of my professional growth for the past 18 years.

I have also benefited from the wisdom of many formal and informal mentors along the way, who have graciously invested in and supported me. The list is long, so I can only name a few: my sister, Atousa, Peter Briggs, Jeanie and Kent Henricksen, Allison Lerner, and Mark Greenblatt. I have learned many life lessons from all of them, which I hope to pass forward.

If confirmed, I will be living proof of the American story, that if you work hard you will 1 day go places no one thought possible. I am a first-generation American and very proud of it. Common to many first-generation Americans, my professional path has not been easy or without sacrifices. To know that someone like me can appear before you is the fulfillment of the American dream—my dream.

With many years of experience, both in the public and private sectors, I believe I offer unique qualifications to lead as the IG for Ex-Im. My experience as Counsel to the Ex-Im IG and subsequent services as Ex-Im’s Acting IG allows me to hit the ground running. I have learned from strong leaders at the Offices of Inspectors General at the U.S. Agency for International Development and the Department of State, where I currently serve as the Chief of Staff. Both agencies have taught me important lessons on effective oversight. If confirmed, I hope to build on that foundation.

I appreciate Ex-Im’s important mission of supporting American jobs by facilitating the export of goods and services. IGs play an important role in conducting reliable, objective, fact-based oversight. Should I be confirmed, I am committed to conducting audits and investigations relating to the programs and operations of Ex-Im, as required by the law, and serving in this role independently, with fairness and integrity. I will seek to bring positive change to Ex-Im programs through constructive relationships with Ex-Im leadership. As Acting IG, I invested considerable time in building those relationships and I will continue to do so, if confirmed, while maintaining the independence of my office.

Inspectors general play a vital role in rooting out bad actors. By partnering with other stakeholders, Government agencies at the Federal and State level, and by promoting a whole-of-Government approach we can make progress in this effort and foster trust in Government programs. Bad actors can erode trust in Federal programs, which can prove fatal to the long-term success of any agency program. If confirmed, I will ensure that my office helps deter those actors by maximizing accountability.

If confirmed, I will uphold the IG Act’s dual reporting requirements to keep the agency head and Congress “fully and currently informed” about problems and deficiencies relating to agency programs and operations and commit to direct and transparent communications with congressional stakeholders.

Ex-Im’s inspector general position has been vacant since June 2014, the longest-running IG vacancy in the Federal Government. Even in the absence of a permanent IG, OIG professionals at Ex-Im have worked hard to advance the mission and conduct meaningful oversight. I acknowledge their accomplishments and dedication
under these challenging conditions and would welcome the opportunity to work hand-in-hand with them, support them, facilitate their work, and bring about the stability of a permanent IG, should I be confirmed.

In closing, I appreciate the opportunity to give back and serve the American people and the country that has made my first-generation American story possible.

Thank you and I would be pleased to respond to any questions you might have.

Chairman BROWN. Thank you, Ms. Salehi. Mr. Tomney, welcome.

STATEMENT OF BRIAN MICHAEL TOMNEY, OF VIRGINIA, TO BE INSPECTOR GENERAL, FEDERAL HOUSING FINANCE AGENCY

Mr. TOMNEY. Chairman Brown, Ranking Member Toomey, thank you for the opportunity to appear before the Committee today while I sit before you as nominee for Inspector General to the Federal Housing Finance Agency, and thank you to President Biden for nominating me to this very important position in Government service.

At the outset, I would like to thank my family members watching remotely and those here, including my son, Michael, who I love very much, and my brother, Chris, who honorably served 32 years in the United States Coast Guard. My two older sisters, Laura and Karen, cannot be here but I appreciate all of their support throughout the years.

Serving the public is a rewarding career path. However, it often comes at the expense of missed family holiday gatherings, weddings, little league games, and school events. And although my parents are both deceased, I believe my core value of service to others emanated from them.

For over 30 years, I have served the public in roles offering me an intimate view of challenges faced by ordinary Americans. As a young man serving as a paramedic/firefighter, I cared for people experiencing homelessness, mental illness, and domestic violence. This work established a foundation of care, compassion, and empathy toward all people that permeates my professional career.

During my service at the Department of Justice, I held accountable individuals violating our Nation’s laws. I proudly led many brave public servants engaged in supporting rule of law efforts overseas following the terrorist attacks on September 11, 2001. And I reimagined an initiative that sought to revisit prison sentences for certain individuals sentenced under drug laws of the 1990s.

Collectively, this arc of public service has helped shape who I am personally and professionally: I am a thoughtful, independent, and objective seeker of facts; I believe that Government service should embrace and promote the value of transparency and integrity; and I believe there is no greater honor than service to the American people.

In the private sector, many of these common threads readily transferred to compliance and ethics teams I have worked with in the financial services industry, in particular integrity, accountability, and transparency.
As Chief of Staff in the Compliance and Ethics department of a Fortune 100 company, I helped ensure the department maintained sound financial practices and used strategic communications to support departmental operations. Furthermore, I have developed, grown, and led teams enhancing regulatory and Board reporting. I also challenged the business to strengthen internal controls, refined independent testing, and helped ensure the proper remediation of any findings. These combined efforts focused on guiding teams to be well-managed, efficient, and effective.

Currently I lead the Office of Corporate Investigations. Here, my teams conduct rigorous and independent investigations into allegations of insider fraud, whistleblower claims, and unethical business practices.

FHFA has a vital role in maintaining the stability and liquidity of the mortgage market, and it furthers equal and affordable access to America’s housing market. That is why it is critical to the American people that the Office of Inspector General fulfill its core mission, which is to promote economy, efficiency, and effectiveness while also protecting FHFA and the entities it regulates against fraud, waste, and abuse.

Since 1978, inspectors general have been independent, objective, and nonpartisan finders of fact. The key to their success is the ability to remain independent and objective—to put it simply, to call balls and strikes. Their duty to report to Congress is an equally important function driving transparency in how our Government's departments and agencies are functioning.

The independence of an IG does not make them immune from accountability for their actions. IGs must set the bar and hold themselves to the highest standards of ethics and integrity.

If confirmed as inspector general, I will exercise my duties with the same level of independence and objectivity that has defined my entire professional career. I will ensure FHFA OIG conducts its audits, evaluations, and investigations in a fair and rigorous manner. I commit to a transparent and responsive relationship with this Committee and Congress. I will endeavor to develop a productive, thoughtful working relationship with the FHFA Director, as an effective relationship will best serve the agency, the entities it supervises, and the American public. Moreover, I will lead FHFA OIG with candor, transparency, and humility.

For me and many in my family, the call to public service is strong. We have a long tradition of military, Government, first responder, and other frontline workers who, like me, believe caring for and protecting our fellow citizens is the highest honor. My three decades of public service share several common themes: independence, integrity, and a belief in the honor of service to the American people. If confirmed, I very much look forward to the opportunity to serve this great country once again.

Thank you, and I look forward to your questions.

Chairman Brown. Thank you, Mr. Tomney.

Ms. Salehi, Ex-Im OIG has previously worked to help the bank reduce fraud and risk. I applaud that focus as the risk of fraud is a significant challenge for financial institutions, both in the public and the private sectors. We know the Ex-Im OIG has also helped identify limited instances when exterior parties have attempted to
perpetrate fraud against Ex-Im, the banks that partner with Ex-Im, to lend to exporters and U.S. taxpayers.

So talk, if you would, about your approach to reducing fraud when evidence of fraud is identified and how your professional experience has helped to ensure that Ex-Im IG’s office can effectively work with DOJ and other law enforcement.

Ms. Salehi. Thank you, Senator. I appreciate the question. I have over 25 years of experience in white-collar crime or Government investigations, both in the Federal Government and in private practice.

When bad actors penetrate the programs of any U.S. Government agency it erodes the trust of the American people. And so my approach, if confirmed, going in would be to take a whole-of-Government approach by engaging with all the stakeholders that are necessary to defer waste, fraud, and abuse. By that I mean I would be working with the Department of Justice, prosecutors and attorneys. I would, of course, be working with the law enforcement partners, other Government agencies such as Office of Special Counsel, Office of Government Ethics or others that have a stake in the game to ensure that we can deter penetration into those Government programs.

Additionally, I will be working, if confirmed, with my Ex-Im OIG staff and look for opportunities where we can introduce internal control measures to the management at the Export-Import Bank of the United States so that they can partner with us in preventing fraud altogether.

Chairman Brown. Thank you. Mr. Tomney, oversight of FHFA and the GSEs involves a wide range of issues from lender fraud to agency options and cybersecurity. How do you prioritize issues for evaluation and investigation in that agency?

Mr. Tomney. Thank you for the question, Mr. Chairman. If confirmed, one of the first areas I will get into is assessing how the agency has been prioritizing those decisions. Historically, they have looked for general buckets, including effective and enhanced provision of the entity conservative operations, the risk posed by counterparties and third parties, and importantly cyber concerns.

I think once I am able to get in to see how they have distributed their resources and human capital I will be in a better position to assess exactly how to prioritize, but certainly matters such as cybersecurity is certainly a whole-of-Government concern, and that will certainly be one of my priorities I will be looking at.

Chairman Brown. Thank you. As more and more of the mortgage process moves online, what new challenges do the GSEs and FHFA face?

Mr. Tomney. Thank you, Mr. Chairman. The challenges are broad, particularly as policymakers weigh different policies. As an OIG, I would envision ensuring robust oversight of whichever tack policymakers take and use the opportunity to produce meaningful reports that can help stakeholders, such as Congress and the agency, to understand the tradeoffs they may be making with those decisions.

Chairman Brown. Thank you. Senator Toomey.

Senator Toomey. Thank you, Mr. Chairman. Ms. Salehi, during your time as Acting IG at Ex-Im, the IG office conducted an evaluation of Ex-Im’s policies and procedures to ensure the bank does
not crowd out the private sector and only supports transactions where Ex-Im financing is necessary. This, I believe, is known as Ex-Im’s additionality policy.

Ex-Im was found to have insufficient recordkeeping in some respects, which increased the risk that the bank might not consider all relevant information about replacing private capital when it approved transactions. In May of 2020, the board of directors strengthened its policies to protect against crowding out private sector capital. It is yet to be seen if the new policies are being properly observed.

Will you commit to conduct another evaluation to determine if Ex-Im is, in fact, complying with its updated policies and procedures that are designed to prevent crowding out of private sector capital, and also will you commit to reviewing the updated policies themselves to ensure that they actually are achieving Ex-Im’s statutory mandate not to replace private capital?

Ms. SALEHI. Thank you, Senator, for the question. If confirmed as the IG for the Export-Import Bank of the United States it would be my job to be looking at policies and procedures of the bank and reporting them to you and to the head of agency and the American public in a transparent fashion.

Of course, I know that this issue of additionality is one that is very important to you, and I would be happy to meet with you and your staff to understand your concerns better and take those concerns to my staff, and consult with my staff, as we set about our work and do our risk analysis of our priorities.

Senator TOOMEY. You would acknowledge that it would fall under your purview to determine if these policies are being properly implemented.

Ms. SALEHI. Yes.

Senator TOOMEY. OK. In September of 2019, Ex-Im approved the second-largest loan in its history. It was a $4.7 billion loan project for an LNG development in Mozambique. Unfortunately, in that same year, we learned of deep corruption in the Government of Mozambique that extended all the way to the former finance minister who had been arrested in a $2 billion fraud and money-laundering scheme that directly hurt U.S. investors.

Now to be clear, Mr. Chang was out of office by the time Ex-Im agreed to the LNG deal, but I just think that the Chang affair revealed deep and pervasive corruption within the Government of Mozambique, and I worry about whether Ex-Im is taking adequate steps to ensure that its financing deals are not subject to some kind of corruption.

Can you commit to doing everything that you can to ensure that Ex-Im does not unwittingly enrich corrupt officials, particularly in countries with long histories of corruption?

Ms. SALEHI. Thank you, Senator. Rooting out bad actors and investigating fraud, waste, and abuse is the core of every OIG mission, and I commit to doing just that, if confirmed.

Senator TOOMEY. Thank you.

Mr. Tomney, if confirmed, one of your responsibilities will be to investigate mortgage fraud that affects Fannie Mae or Freddie Mac. In the lead-up to the 2008 financial crisis, the GSEs got into the business of acquiring so-called no-doc and low-doc loans, where
the borrower simply attested to his or her eligibility without any independent verification.

Well, predictably, some borrowers lied about their income and other key factors considered in the underwriting, and predictably, many of those borrowers eventually defaulted, resulting in significant losses at the GSEs that were then borne by the taxpayers.

Unfortunately, or Democratic colleagues are pursuing this reckless tax-and-spending bill that will return the GSEs to the precrisis practice of relying on unverified borrower attestations. It is inevitable, in my mind, that some borrowers, once again, will misrepresent their circumstances in order to get, for instance, downpayment assistance.

If you are confirmed, Mr. Tomney, and if this bill becomes law, will you commit to vigorous investigations of borrowers who knowingly lie about their eligibility for downpayment assistance on GSE-acquired loans?

Mr. TOMNEY. Thank you, Ranking Member Toomey, for the question. Yes, if confirmed, I believe one of the key roles of Office of Inspector General is to engage in robust enforcement efforts, and this would certainly be an area that, should that law pass, I believe would come under our purview, and like we have seen with a lot of the stimulus investigations going on, we will continue to engage in robust enforcement efforts.

Senator TOOMEY. Thank you. I appreciate that. I would just point out, if past practices by some at the Department of Justice and some at the CFPB are any indication, if I were a lender and a borrower lied on his application and I extended credit in part because of a lie, or I should say relying on the lie, I would be worried that I would be the one that would be subject to investigation and made to face the consequences. But I appreciate your answer.

Thank you, Mr. Chairman.

Chairman BROWN. Thank you, Senator Toomey.

Senator MENENDEZ. Thank you, Mr. Chairman.

Mr. Tomney, I was pleased to read in the FHFA Office of Inspector General’s annual plan for fiscal year 2022 that the office you are nominated to lead is planning an audit of, quote, “FHFA’s initiatives responding to the Executive order on advancing racial equity and support for underserved communities through the Federal Government.”

Given the immense disparities faced by minority home buyers, I believe it is imperative that FHFA does everything in its power to promote racial equity in its role as a regulator of housing finance.

Do you agree that reviewing FHFA’s racial equity initiatives will make the agency more effective?

Mr. TOMNEY. Thank you, Senator, for the question. I agree that there have been new discussions and focus in that area, which is certainly the purview of the policymakers, and to the extent that more focus is paid in that area I certainly commit to engage in robust oversight of that activity so that we can provide information to key stakeholders such as Congress and yourself, as well as the agency, to understand the course of action that they are taking.
Senator Menendez. So if you are confirmed you are going to follow through on what the FHFA already said that they are intending to do. No?

Mr. Tomney. Thank you, Senator. Yes, to the extent that the OIG has committed to engaging in that, yes.

Senator Menendez. Well, the FHFA plays a critical role in maintaining a fair and healthy housing finance market, and a critical part of that mission is ensuring that all home buyers, regardless of race, are treated fairly. So will you commit to making this review a top priority, if confirmed?

Mr. Tomney. Senator, yes.

Senator Menendez. All right. Now I was glad to see that the fiscal year 2022 FHFA plan contained a planned evaluation of, quote, “the FHFA’s efforts to identify and address potential appraisal bias and valuation disparities.”

Now home ownership is the cornerstone of intergenerational wealth in our country, particularly for low- and middle-income Americans. However, home ownership can only lead to wealth building if homes are properly appraised and valued. Will you commit to making this review a top priority?

Mr. Tomney. Senator, thank you for the question. I certainly commit to, if confirmed in the office, rolling up my sleeves and making sure that that is addressed quickly.

Senator Menendez. Well, I appreciate hearing that because minority homes, we know, are not properly appraised in value, thanks to numerous studies, including one from Freddie Mac showing that about 15.5 percent of single-family properties in majority Latino, and 12.5 percent in majority Black census tracts are appraised lower—lower—than their contracted price, compared to 7.4 percent in white neighborhoods. That is a fundamental, dramatic difference. That is why these types of audits would be so important.

So if confirmed, what will you do to ensure that FHFA’s new appraisal policies are effective and not harmful to minority home buyers?

Mr. Tomney. Thank you, Senator. To the extent that those policies are implemented, I will ensure that the office follows through with doing rigorous assessments, looking at metrics and models to ensure that they are producing meaningful reports that are helpful to all of the stakeholders, including the American public.

Senator Menendez. Ms. Salehi, Ex-Im has always found ways in which it can improve—I believe it has ways, I should say, in which it can improve when it comes to racial equity. For instance, the most recent Ex-Im competitiveness report noted that only 14.6 percent of Ex-Im’s director small business support went to minority- and women-owned businesses. These businesses were among the hardest hit by the pandemic, so it is critical they have access to the tools and assistance to remain competitive. By the way, before the pandemic, they were also the greatest rate of growth among small and mid-sized businesses in the Nation.

Do you agree that part of Ex-Im’s mission is to support minority- and women-owned business efforts to engage in international commerce?
Ms. SALEHI. Yes, Senator. In the 2019 reauthorization of the bank I believe that Export-Import Bank has a mandate for small businesses, to do business with small businesses.

Senator MENENDEZ. So how would you help Ex-Im improve their performance when it comes to the issues of racial equity?

Ms. SALEHI. Thank you for that question. This issue of diversity and inclusion is a priority of mine. It is a very important issue, and I hope that when and if I am confirmed, to be able to basically bring that fact that diversity matters at the top and ensure that my Ex-Im OIG staff finds areas of opportunity when they do their work, of audits and inspections and evaluations, with an eye toward diversity, inclusion, and this priority.

I also would like to make sure that my own staff, within Ex-Im OIG is empowered to think through these issues of diversity and inclusion and include them wherever possible for management of the bank to think through them.

Senator MENENDEZ. Well, let me close by saying an IG’s purpose is to make the agency they oversee more efficient and effective, and Ex-Im certainly has a lot of room to improve on making racial equity a greater reality, so we look forward to working with you upon your confirmation to make sure that happens.

Thank you, Mr. Chairman.

Chairman BROWN. Thank you, Senator Menendez. Senator Tester, of Montana, is recognized.

Senator TESTER. Thank you, Mr. Chairman and Ranking Member, and I appreciate both of you being here today for your respective positions. You have both talked, in your opening statements, about being independent and objective, which I agree with 100 percent. The question is, how will you work to protect your independence and fend off any sort of interference by the agency head or, quite frankly, one of us? Go ahead, whoever wants to go first.

Mr. TOMNEY. Thank you, Senator, for the question. To your point, independence is the heart of the role of an inspector general, and I have said to others that but for that independence then OIG is nothing but a paper tiger. I think developing a productive working relationship with the director of the agency is essential, because at this core contentious relationships often do not end up good for either side. So that is not to cede my independence or objectivity. In fact, it is for those moments where we might disagree on something, and we can disagree without being disagreeable.

And so I look forward to developing that relationship as well as I look forward to developing a productive relationship with Congress, again, so once again my independence and objectivity will not be questioned, but that does not mean I do not listen to key stakeholders such as yourself.

Senator TESTER. I will come back. Ms. Salehi.

Ms. SALEHI. Thank you, Senator. So within OIGs we have professional standards that we have to abide by. For example, our auditors, the auditing standard that requires them to be independent of mind and appearance. And of course, if confirmed, if I am leading a group of auditors in that office, that applies to myself in that I have to conduct myself and my office in a way that is independent both in fact and in appearance. And so I plan on conducting myself in such a way.
Senator Tester. So tell me what you would do—this is for both of you, because it applies to both of you—tell me what you would do if the director would stonewall you on information? Because oftentimes—and I agree with you, Mr. Tomney, that it is good to have that relationship—but oftentimes they might not like your recommendations. They might not think they are fair. They might not think they are just. So what do you do when they stonewall you?

Mr. Tomney. Thank you, Senator. It is true, I am sure inspectors generals are not necessarily the life of the party when they come walking in, but I believe that developing that relationship that is productive is important. If I am unable to get access to information, access to information is fundamental to the work and we cannot conduct full, robust, and fair audits, evaluations, and investigations without it. If I am unable to work through within the agency then there are alternatives, such as speaking with folks in Congress.

Senator Tester. OK. Ms. Salehi, do you have anything to add?

Ms. Salehi. My colleague and I see eye to eye, Senator. I believe that there are a number of legislations currently in front of Congress that the intent of them are to strengthen the inspectors general to be able to do their work more independently and better. And the same, you know, if the constructive relationships that we have with the head of the agency does not work and we have barriers such as access to information or access to the head of agency, I would certainly engage with your office and members of Congress to ensure that those barriers are known to you.

Senator Tester. Yeah, I would hope you would do that, and I would hope you would do that quickly, because you are our eyes and ears, and it is really important.

Mr. Tomney. Senator, I echo my colleague’s comments as well. A good leader will always listen to the subject matter experts and take that into consideration. Leaders should surround themselves with folks who tell them what they need to hear, not what they want to hear.

Senator Tester. I want to thank you both for being here and putting yourself up for this job. I will tell you that some people in the Senate do not like the FHFA because some people do not like the 30-year fixed rate mortgage, and I can tell you some people do not like Ex-Im because they see it as supporting people who do not need support. I hope that does not stop them from voting for you, because we need your eyes and ears in these departments. We can have a debate about the other stuff at another point in time. Thank you.

Chairman Brown. Thank you, Senator Tester. Senator Cortez Masto is recognized from her office, from Nevada.
Senator CORTEZ MASTO. Thank you, Mr. Chairman. Mr. Tomney, Ms. Salehi, congratulations on your nominations.

Mr. Tomney, let me start with you. Everybody is aware of Freddie Mac and Fannie Mae. They are household names for many Americans. But few folks are aware of the Federal Home Loan Bank system. The Nation’s 11 Federal Home Loan Banks are charged with meeting the affordable housing, the community development needs of the States, and the communities they serve.

So my question, Mr. Tomney, to you is, if confirmed as inspector general, will you commit to take a fresh look at the distribution of work in the OIG and ensure that the FHLBs are given the appropriate level of meaningful oversight as outlined in their mission? And that includes each Federal Home Loan Bank’s community lending plans.

Mr. TOMNEY. Thank you, Senator, for the question. I agree with you that if you stopped random people on a sidewalk that most people would be able to at least be familiar with Fannie Mae or Freddie Mac, and generally speaking what they do, and perhaps far fewer would understand what the Federal Home Loan Bank system is all about.

So yes, Senator, if confirmed, I look forward to getting in the office, rolling up my sleeves, seeing where the current breakdown of resources are devoted, and taking a fresh look to ensure that not only are we looking at the Federal Home Loan Bank system but to make sure that to the extent that we do reporting on it that those reports are meaningful to key stakeholders like yourself. And I look forward to working with you and your staff, if confirmed, to do so.

Senator CORTEZ MASTO. I appreciate that because I have concerns that the Federal Home Loan Banks are not meeting the needs of all the communities. Let me just give you an example. In previous years only one bank has any goal for Native Americans in the community. And so I am hopeful that you will really take a look at that and be transparent and provide the information Congress needs to be able to work with Federal Home Loan Banks as well. So thank you for your comment.

Let me touch on cybersecurity very quickly, and I know some of my colleagues have. Fannie Mae and Freddie Mac rely heavily on counterparties and third parties to originate and service their mortgages, enterprise, purchase, and provide operational support for a wide array of professional services. This reliance creates an opening for cybercriminals.

So these counterparties and third parties would be under your office’s oversight. How do you see the OIG office monitoring and reporting on cybersecurity during the selection and procurement process of these counterparties and third-party service providers?

Mr. TOMNEY. Thank you, Senator, for the question. Certainly the counterparty and third-party risk area has dovetailed extensively into the cybersecurity world. If confirmed, I look forward to getting up to speed on exactly what has been done so far. There are certain statutory reports that OIGs within the Government do. I am not convinced that that is nearly enough. And so if confirmed, I can commit to you that that will be one of the focus areas for me, because as you State, the risk is so very high, particularly with the
volume of NPI and PII information that is out there that could be the subject of criminal actors.

Senator CORTEZ MASTO. Thank you. And then, when appropriate, can you promise transparent and accessible delivery of your findings to Congress?

Mr. TOMNEY. Senator, yes.

Senator CORTEZ MASTO. Thank you.

Ms. Salehi, same question. When appropriate, can you make sure that transparent and accessible delivery of your findings to Congress as well?

Ms. SALEHI. Absolutely, Senator, yes.

Senator CORTEZ MASTO. Thank you. Ms. Salehi, the Export-Import Bank is important to Nevada companies. Twenty-six companies in Nevada use the Ex-Im Bank to sell their products to buyers abroad. You have extensive experience at the Ex-Im Bank. If confirmed as the inspector general, what barriers do you expect to have as an IG and what will you need to overcome those barriers?

Ms. SALEHI. Thank you for the question, Senator. Obviously I am not currently at the bank and only have access to the public information. In reviewing those public reports and information I cannot identify any specific issue currently that they may be facing. However, in general, as we have talked about here before, the general barriers for any IG would be, for example, lack of funding if the agency program or the agency has grown in size and, for example, their OIG has not grown in the same level and extent. That would be an issue because that would hinder the ability or the OIG to produce meaningful and impactful evaluations and audits.

Another barrier would be if there is a lack of access to information or to the agency head. It is very important to have those constructive relationships with the agency head. And I guess last I will mention, also, the issue of independence, which we discussed before, and that would be a barrier if not recognized by the agency.

Senator CORTEZ MASTO. And I know my time is almost up, but let me just ask you this, because you both talked about independence. I have heard my colleagues ask you questions about that. How important is it to get the independent facts that you need? It is crucial to be able to [inaudible] functions of the jobs. Isn’t that right?

Ms. SALEHI. That is correct, Senator. It is a core value for us in OIGs to be independent of mind and to look at facts in a non-partisan fashion, and lead the facts wherever they take us.

Senator CORTEZ MASTO. Thank you. I know my time is up. Thank you, Mr. Chairman.

Chairman BROWN. Thank you, Senator Cortez Masto.

That is it for the hearing. Thank you to both our nominees for being here today and providing testimony. It was a productive discussion of the issues and thanks for your candor. I hope to move forward quickly on Ms. Salehi’s nomination and Mr. Tomney’s nomination.

For Senators who wish to submit questions for the hearing record those questions are due at the close of business on Friday, December 10th. To the nominees, we would like to have your responses back to us by noon on Tuesday, December 14, 2021.
Thank you again for your testimony. With that the hearing is adjourned.
[Whereupon, at 10:52 a.m., the hearing was adjourned.]
[Prepared statements, biographical sketches of nominees, and responses to written questions supplied for the record follow:]
PREPARED STATEMENT OF CHAIRMAN SHERROD BROWN

The Committee meets today to consider the nominations of: Parisa Salehi to be Inspector General of the Export-Import Bank; and Brian Tomney to be Inspector General of the Federal Housing Finance Agency.

We congratulate the nominees and thank them for appearing here today, and for their willingness to serve in these important roles.

I also want to welcome their families and friends in attendance and watching from home.

It’s so important that the Biden administration is working to fill inspectors general vacancies. These positions are vital to making our Government work for people, and to ensuring tax dollars are put to good use for the people we serve.

The Trump administration took unprecedented steps to undermine IGs across the executive branch. They either sidelined them, or fired them without cause, simply for doing their jobs—for showing independence and pursuing the facts.

Through audits, evaluations, and investigations, inspectors’ general offices play pivotal roles in uncovering abuse, waste, and fraud—ensuring American taxpayer dollars are protected.

The nominees today possess the independence, honesty, and integrity—qualities we all want and expect in an inspector general—they need to take on these critical roles.

And both nominees appearing before us today are clearly qualified.

Ms. Salehi currently serves as the Chief of Staff to the Inspector General of the Department of State where she assists the IG on enterprise risk management and oversees the Congressional and public affairs sections of the IG office. Prior to joining the State Department, Ms. Salehi served in the USAID inspector general office.

Previously, Ms. Salehi spent more than 4 years at Ex-Im–OIG, serving in various roles, including as Acting Inspector General from 2018 to 2019. If confirmed, she would be rejoining an office she is very familiar with, and her experience with the Bank’s charter and its operations will enhance her office’s work.

When Ms. Salehi served as the Acting Ex-Im Inspector General, my office found that she was very responsive to requests when we needed additional information concerning her office’s investigations and reports.

Ex-Im is vital to manufacturers both in Ohio and throughout the country. It will be Ms. Salehi’s job to help ensure that the bank is working efficiently. And she will help the Bank comply fully with its charter and other statutory requirements. She is well prepared to step into this job immediately.

Welcome to the Committee, Ms. Salehi.

From 2006 to 2017, Mr. Tomney served in various roles at the Department of Justice. From 2006 to 2009, he served as a Trial Attorney in DOJ’s criminal division, where he investigated drug trafficking and narco-terror organizations.

From 2009 to 2014, Mr. Tomney served as Counsel for Rule of Law in the Office of the Deputy Attorney General, where he engaged with teams of federal prosecutors and attorneys in efforts to root out corruption and support the rule of law in Afghanistan and Iraq. He went on to serve in several roles, including Associate Deputy Attorney General.

Mr. Tomney has a proven commitment to service, even in the toughest situations—early in his career, he spent more than a decade as a paramedic and firefighter.

He will bring those same values with him to this job, ensuring that FHFA is working for all homeowners and renters.

Welcome to the Committee, Mr. Tomney. We are glad to have you here today.

Thank you to the nominees for your willingness to serve. I look forward to your testimonies today.

PREPARED STATEMENT OF SENATOR PATRICK J. TOOMEY

Thank you, Mr. Chairman.

Ms. Salehi and Mr. Tomney, welcome to you both. I commend you for your commitment to public service.

Mr. Tomney, if confirmed, you’ll have a challenging job. The GSEs led us into the 2008 financial crisis through their excessive risk taking. Congress established FHFA as a tough regulator to ensure that never happened again. But instead of being the cop on the beat, the Biden administration seems intent on turning FHFA into a co-conspirator with the GSEs.

FHFA has taken a number of troubling steps to extend credit to risky borrowers and undermine the GSEs’ financial condition. It has proposed reductions in the GSEs’ capital requirements, lowered guarantee fees and has said it is considering
further cuts, suspended restrictions on the GSEs’ risk layering and acquisitions of investor and second home loans, relaxed the GSEs’ underwriting requirements, and replaced much of FHFA’s senior leadership.

Meanwhile, housing prices have skyrocketed an astonishing 18.5 percent in the last 12 months alone. I think it’s a question of when, not if, these good times for the housing market come to an end. I worry that FHFA’s enabling of risky lending, together with the Administration’s total disinterest in recapitalizing the GSEs through outside private capital, has placed the GSEs on a path toward another round of taxpayer bailouts.

Mr. Tomney, if that were not already enough, your job will be made more challenging by an Administration with no discernable housing policy besides giving mortgages to as many borrowers as possible with little regard to their ability to repay.

Housing is expensive because our housing policy subsidizes demand while ignoring supply constraints. The Democrats’ reckless tax-and-spend bill makes little effort to increase housing supply.

The Senator Schumer earmark, or “Schu-mark” that I discussed at the October 21st hearing, would spend up to $40 billion renovating New York City’s existing public housing. Much of the other housing funds would go to imprudent downpayment assistance and rental vouchers that add to housing demand.

The bill even creates an astonishing invitation to mortgage fraud by making $15 billion available to borrowers who sign an attestation, truthfully or not, that they are “first-generation homebuyers.” Amazingly, you can qualify so long as your parents do not currently own a home and you have not owned a home in the last 3 years. So much for “first generation” homebuyer.

We need to try something different than the same housing policies that caused the 2008 financial crisis. To that end, in March I proposed principles to guide housing finance reform discussions. The Administration, however, has shown no interest in real reform, and even missed a September 30th deadline to report on its plan.

Mr. Tomney, given the path the Administration has put us on, I suspect you might soon be investigating how we so eagerly doubled down on 50 years of failed housing policy and so predictably led the GSEs into another round of taxpayer bailouts.

Now turning to Ex-Im. Ex-Im claims that it only takes risks that private lenders are unable or unwilling to take. We should stop right there and ask ourselves: if private lenders are unwilling or unable to take a risk, why should taxpayers be forced to take that risk?

Yet at the same time, Ex-Im also claims it only makes safe bets. It’s impossible to do both. Ex-Im can’t only take transactions so risky that no one else will do them, and at the same time only be doing safe transactions.

Ex-Im wins business by systematically underpricing risk. That’s why borrowers go to Ex-Im, instead of any number of private lenders that will not offer deals on the same terms as Ex-Im.

That’s why our largest banks go to Ex-Im for loan guarantees. The Ex-Im terms are too good to be true—at least in the private sector.

It’s important to note that the vast majority of American exports get done without Ex-Im support. We’ve reviewed annual export data from 2007 through 2020. In that period, the highest percent of U.S. exports using Ex-Im financing was in 2012 and it was only 2.3 percent. And that was when Ex-Im had everything going for it. It was fully operational, had a quorum on its board, and had not reached its lending limit.

The reality is: we’re the world’s second largest exporter of goods behind only China. We lead the world in value-added exports. And we do it almost entirely without Ex-Im financing.

Not only is Ex-Im financing generally not needed, but it’s often nothing more than crony capitalism providing taxpayer-financed subsidies to some of the world’s largest companies who have access to private capital. Ex-Im’s recent deal guaranteeing an $82 million loan from JPMorgan to Qantas for the purpose of buying jet engines from GE is just one example.

Generally, the same giant lenders, exporters, and foreign companies—often State owned—benefit from Ex-Im while taxpayers take the risk. There’s also a history of waste, fraud, and abuse at Ex-Im.

Ex-Im’s IGs have identified numerous concerning practices at the bank over the years. If confirmed, Ms. Salehi will have the important responsibility of serving as an independent watchdog.

Mr. Chairman, I look forward to hearing from today’s nominees.
Thank you, Chairman Brown, Ranking Member Toomey, and Members of the Committee. I am honored to appear before you today as the President’s nominee to be the Inspector General of the Export-Import Bank of the United States.

I would not be here today without the generous support of my family, friends, and colleagues. I would particularly like to recognize my mother, whose hard work and determination has afforded me many opportunities. She grew up far away from this free land, in a place where she was legally required to get her husband’s permission to do many simple things, like travel. Through selfless acts she ensured that her kids would have better and brighter life choices than the ones available to her. I would also especially like to thank my partner, Burk, who is here with me today and has been supportive of my professional growth for the past 18 years.

I have also benefitted from the wisdom of many formal and informal mentors along the way, who have graciously invested in and supported me. The list is long, so I can only name a few: My sister Atousa, Peter Briggs, Jeanie and Kent Henricksen, Allison Lerner, and Mark Greenblatt. I have learned many life lessons from all of them, which I hope to pass forward.

If confirmed, I will be living proof of the American story—that if you work hard, you will one day go places no one thought possible. I am a first-generation American and very proud of it. Common to many first-generation Americans, my professional path has not been easy or without sacrifices. To know that someone like me can appear before you, is the fulfillment of the American dream—my dream.

With many years of experience both in the public and private sectors, I believe I offer unique qualifications to lead as the IG for Ex-Im. My experience as Counsel to the Ex-Im IG and subsequent service as Ex-Im’s Acting IG allows me to hit the ground running. I have learned from strong leaders at the Offices of Inspector General at the U.S. Agency for International Development and Department of State, where I currently serve as the Chief of Staff. Both agencies have taught me important lessons on effective oversight. If confirmed, I hope to build on that foundation.

I appreciate Ex-Im’s important mission of supporting American jobs by facilitating the export of goods and services. IGs play an important role in conducting reliable, objective, fact-based oversight. Should I be confirmed, I am committed to conducting audits and investigations relating to the programs and operations of Ex-Im, as required by the law, and to serving in this role independently, with fairness and integrity. I will seek to bring positive change to Ex-Im programs through constructive relationships with Ex-Im leadership. As Acting IG, I invested considerable time in building those relationships and I will continue to do so, if confirmed, while maintaining the independence of the Office.

IGs play a vital role in rooting out bad actors. By partnering with other stakeholders, Government agencies at the Federal and State level, and by promoting a “whole of Government” approach, we can make progress in this effort and foster trust in Government programs. Bad actors can erode trust in Federal programs, which can prove fatal to the long-term success of any agency program. If confirmed, I will ensure that my office helps deter those actors by maximizing accountability.

If confirmed, I will uphold the IG Act’s dual reporting requirements to keep the agency head and Congress “fully and currently informed” about problems and deficiencies relating to agency programs and operations and commit to direct and transparent communications with congressional stakeholders.

Ex-Im’s Inspector General position has been vacant since June 2014—the longest-running IG vacancy in the Federal Government. Even in the absence of a permanent IG, OIG professionals at Ex-Im have worked hard to advance the mission and conduct meaningful oversight. I acknowledge their accomplishments and dedication under these challenging conditions and would welcome the opportunity to work hand-in-hand with them, support them, facilitate their work, and bring about the stability of a permanent IG should I be confirmed.

In closing, I appreciate the opportunity to give back and serve the American people and the country that has made my first-generation American story possible.

Thank you and I would be pleased to respond to any questions you might have.
## STATEMENT FOR COMPLETION BY PRESIDENTIAL NOMINEES

Name: 
(Surname) Parisa

Position to which nominated: Inspector General, Export-Import Bank of the United States

Date of nomination: October 19, 2021

City of Residence: Washington, DC and The Plains, VA

### Education *
<table>
<thead>
<tr>
<th>Institution</th>
<th>Dates Attended</th>
<th>Degrees Received</th>
<th>Dates of Degree</th>
</tr>
</thead>
</table>

*Nominees should provide information for all institutions attended, whether or not the nominee was granted a degree by the institution.

### Honors and awards
- Secretary’s Award, USDA (2013)
- Presidential Volunteer Service Award (2012)
- Am Jur Environmental Law Award (1977)
- Most Court International Law Award (1996)
- Dean’s List Award (1955)
- International Cultural Service Award (1993-1994)
- Global Education Award (1992)

### Memberships
- Bar Membership: District of Columbia (DC0115) (2001 - Present)
- Bar Membership: Arizona (AZ020917) (1999 - Present)
Employment record: List below all positions held since graduation from college including the title or description of job, name of employer, location of work, and inclusive dates of employment.

U.S. Department of State – Chief of Staff (January 2021 to Present) and Assistant Inspector General for Enterprise Risk Management and Acting Chief of Staff, April 2020 – January 2021, Arlington, VA


Export-Import Bank of the United States – Acting Inspector General, August 2018 – July 2019, Washington, DC

Export-Import Bank of the United States – Counsel to the Inspector General, December 2014 – August 2018, Washington, DC


Howard University School of Law – Adjunct Associate Professor of Law, May 2003 – December 2011 (intermittently), Washington, DC

Paul Weiss Rifkind Stein Hamilton – Staff Attorney, December 2007 – April 2008, Washington DC

Reese Brown – Associate Attorney, August 2007 to December 2007, Arlington VA

Venable, DC – Staff Attorney, December 2003 to December 2007, Washington DC

Clearly Gottlieb Steen Hamilton – Project Attorney, June 2001 to December 2003 through Law Corps and through Hodgson Legal May 2008–February 2010 (intermittently), Washington DC

Holloway Odgaard Sweeney and Evans – Associate Attorney, August 2000–June 2001, Phoenix AZ


The United Nations, Center for Human Rights, Intern, 1997, Geneva, Switzerland


Government Experience: List any experience in or direct association with Federal, State, or local governments including any advisory, consultative, honorary or other (including part-time) service or positions.
<table>
<thead>
<tr>
<th>Name of Government Entity</th>
<th>Position</th>
<th>Dates of Service</th>
</tr>
</thead>
<tbody>
<tr>
<td>U.S. Department of State</td>
<td>Chief of Staff and Assistant Inspector General for Enterprise Risk Management, April 2020 – current, Arlington, VA</td>
<td></td>
</tr>
<tr>
<td>Export-Import Bank of the United States</td>
<td>Counsel to the Inspector General, December 2014 – August 2018, Washington DC</td>
<td></td>
</tr>
<tr>
<td>U.S. Department of Agriculture</td>
<td>Director at Risk Management Agency, October 2012 – December 2014, Washington DC</td>
<td></td>
</tr>
<tr>
<td>U.S. Department of Agriculture</td>
<td>Acting Chief and Senior Specialist at Agricultural Marketing Services, February 2010 – October 2012, Washington DC</td>
<td></td>
</tr>
</tbody>
</table>

**Published writings:** List the titles, publishers and dates of books, articles, reports and other published materials you have written. The list should include any publicly accessible publications on the internet in the past ten years, including appropriate URLs for any posts on blogs you maintained or contributed to, and URLs for any other significant internet-based postings during that same period. If available, provide the Committee with one digital copy of each of the writings you list.

None.

**Speeches and presentations:** List all of the formal speeches and presentations (e.g., PowerPoint) you have delivered during the past ten years which are on topics relevant to the position for which you have been nominated, including dates. If available, provide the Committee with one digital copy of each formal speech and presentation. If text is no longer available, list the date, place, and organization or group to whom you made the speech or presentation.

None.

**Public statements:** List all public statements you have made during the past ten years which are on topics relevant to the position for which you have been nominated, including dates. Whenever possible, provide the Committee with finding aids (such as citations, internet URLs, etc.) for each statement.

Panelist, “Common (and not so common) Triggers for S&D Referrals,” 2016 Suspension & Debarment Workshop, Council of Inspector General for Integrity and Efficiency and the Interagency Suspension and Debarment Committee; Alexandria, Virginia, November 18, 2016;
Social media usernames: Please provide a list of all of your currently active social media usernames (e.g., Facebook, Instagram, Twitter, etc.), and any usernames for any inactive accounts you have used within the previous ten years.

https://www.linkedin.com/in/puriasaleshi87797b4/
https://www.facebook.com/puria.saleshi.190/
https://www.instagram.com/puriasaleshi/

Political affiliations and activities: List memberships and offices held in and services rendered to all political parties or election committees during the last ten years.

None.

List all public offices, if any, for which you have been a candidate in the past ten years.

<table>
<thead>
<tr>
<th>Name of Office</th>
<th>Elected/Appointed Candidate Only</th>
<th>Year(s) Election Held or Appointment Made</th>
<th>Terms of Service (if applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>None.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Political contributions: Itemize all political contributions which exceed $200 or which aggregate to over $200 in a calendar year to any individual, campaign organization, political party, political action committee or similar entity during the last ten years and identify specific amounts, dates, and names of recipients.

None.

Qualifications: State fully your qualifications to serve in the position to which you have been named.

(attach sheet)

Please see attached.

Future Employment relationships: 1. Indicate whether you will sever all connections with your present employer, business firm, association or organization if you are confirmed by the Senate.

Yes.

2. As far as can be foreseen, state whether you have any plans after completing government service to resume employment, affiliation or practice with your previous employer, business firm, association or organization.

I am currently a Federal Government employee.

3. Has anyone made a commitment to employ you after you leave government service?

No.
4. Do you expect to serve the full term for which you have been appointed?

Yes.

Potential conflicts of interest:

1. Describe any financial arrangements or deferred compensation agreements or other continuing dealings with business associates, clients or customers who will be affected by policies which you will influence in the position to which you have been nominated.

None.

2. List any investments, obligations, liabilities, or other relationships which might involve potential conflicts of interest with the position to which you have been nominated.

None.

3. Describe any business relationship, dealing or financial transaction (other than tax paying) which you have had during the last ten years with the Federal Government, whether for yourself, on behalf of a client, or acting as an agent, that might in any way constitute or result in a possible conflict of interest with the position to which you have been nominated.

In connection with the nomination process, I have consulted with the Department of Justice, Office of Occupations and Ethics and other designated Federal agencies to identify potential conflicts of interest. Any potential conflicts of interest will be resolved in accordance with the terms of any ethics agreement.

4. List any lobbying activity during the past ten years in which you have engaged in for the purpose of directly or indirectly influencing the passage, defeat or modification of any legislation at the state or local level of government or affecting the administration and execution of national law or public policy.

None.

5. Explain how you will resolve any conflict of interest that may be disclosed by your responses to the items above.

In connection with the nomination process, I have consulted with the Department of Justice, Office of Occupations and Ethics and other designated Federal agencies to identify potential conflicts of interest. Any potential conflicts of interest will be resolved in accordance with the terms of any ethics agreement.

Tax compliance and bankruptcy:

1. In the past ten years, have you and your spouse (if applicable) filed and paid all taxes (federal, state, and local) as of the date of your nomination? Indicate if you filed as 'married filing separately.'

Yes.

2. In the past ten years, have you been required to make any back tax payments? If so, indicate if you have made any back tax payments and provide full details.
3. Has a tax lien or other collection procedure(s) been instituted against you or your spouse (if applicable) by federal, state, or local authorities? If so, provide full details.

No.

4. In the past ten years, have you or your spouse (if applicable) ever been the subject of any audit, investigation, or inquiry for federal, state, or local taxes? If so, provide full details.

No.

5. Were all your Federal, State, local, and other tax returns and tax liabilities of any kind current (filed and paid when due) as of the date of your nomination? If not, provide details.

Yes.

6. Have you ever filed for bankruptcy? If so, provide details.

No.

Civil, criminal and investigatory actions:

1. Have you ever been the subject of a complaint or been investigated, disciplined, or otherwise cited for a breach of ethics for unprofessional conduct before any court, administrative agency (e.g., an Inspector General’s office), professional association, disciplinary committee, or other ethics enforcement entity at any time? If so, provide details, regardless of outcome.

No.

2. Have you ever been investigated, arrested, charged, or held by any Federal, State, or other law enforcement authority for a violation of any Federal, State, county or municipal law, regulation, or ordinance, other than a minor traffic offense? If so, provide details.

No.

3. Have you ever been involved as a party in interest in any administrative agency proceeding, or civil litigation other than a divorce proceeding? If so, provide details.

Yes.

A complaint filed an EEO against the agency naming multiple parties. I was among several officials identified in that complaint. I worked with counsel to submit a statement for the purposes of the EEO investigation. I have no knowledge of the resolution of this case. I was not asked to participate further beyond providing the written statement.

4. Have you ever been convicted (including pleas of guilty or nolo contendere) of any criminal violation other than a minor traffic offense? If so, provide details.

No.
No.

**Other information:** Please advise the Committee of any additional information, favorable or unfavorable, which you believe should be considered in connection with your nomination.

None.

**Public records search:** Do you consent to allow Committee staff to conduct a public records search on you using appropriate search tools? (including Westlaw, Lexis, etc.)

Yes.

The undersigned certifies that the information contained in the public statement to the Committee is true and correct.

Signed: ____________________________  Date: ____________________________

Parisa Salehi
Statement of Qualifications

I do consider an appointment to any of the vacant Presidentially Appointed Senate Confirmed positions to be a privilege. However, I believe I am uniquely qualified for the position of Inspector General at the Export-Import Bank of the United States.

One of the most important experiences I bring is served as the Acting Inspector General for the Export-Import Bank of the United States (EXIM). As somebody who has had the privilege of serving as an Acting Inspector General, I truly understand the importance of the work performed by an Inspector General for the taxpayers. I know firsthand of the meaningful work that is performed at the Export-Import Bank of the United States to advance its mission to create American jobs. As Inspector General, I will be conducting and supervising audits, investigations, inspections, and evaluations related to the Bank programs and operations; providing leadership and coordination, as well as recommending policies that promote economy, efficiency, and effectiveness in such programs and operations; and preventing and detecting fraud, waste, abuse, and mismanagement.

During my 15 year-career in both the private and public sectors, I have held positions of increasing responsibility and authority on both the operational and program side. On the programmatic side, I identified opportunities to improve the efficiencies and effectiveness of the programs that I oversaw. I have also led groups of investigators to deter fraud and protect the integrity of government programs, resulting in substantial monetary recoveries to the US Treasury. I continuously reviewed complicated legislation and regulations together with other oversight bodies to enhance the IG community's oversight role. On the topic of leadership, I focused my attention as an Acting IG on employee morale, breaking down silos to the extent possible, and best practices regarding communication with the agencies we oversee.

As for operational experience, I joined the Office of Management at the United States Agency for International Development OIG in order to learn more about operations within a large OIG. While serving as an Acting Inspector General I learned that a well operating office boosts staff morale; I also learned that the inverse of that is true. At USAID OIG, I led the Inspector General and Deputy Inspector General on all phases of the budget process, from initial planning to negotiations with OMB and presentation to Congress, ensuring that our budget supported the IG's vision. I prepared the Inspector General to negotiate and defend resource recommendations, and directed the management of all human, financial and information resources for USAID OIG.

At the Department of State OIG, I assist the Inspector General on enterprise risk management and delivery of all our written audits, inspections, and reports of investigations timely, accurately and efficiently. I lead a dedicated group of auditors, inspectors, investigators and support staff to independently promote economy and efficiency and prevent or detect waste, fraud, abuse, and mismanagement in the programs and operations of the Department and the U.S. Agency for Global Media. Additionally, I oversee the Congressional and public affairs section to ensure
transparency in State OIG’s disclosure of information to all stakeholders including Congress and the American taxpayers.

In sum, as a result of having had many different seats within the OIG community, my experiences are diverse, intense and deep. Serving as the Inspector General for the Export-Import Bank would both be an honor and a privilege.
Chairman Brown, Ranking Member Toomey, thank you for the opportunity to appear before the Committee today while I sit before you as nominee for Inspector General to the Federal Housing Finance Agency (FHFA). And thank you to President Biden for nominating me to this very important position in Government service.

At the outset, I would like to thank my family members here and those watching remotely. Serving the public is a rewarding career path. However, it often comes at the expense of missed family holiday gatherings, weddings, little league games, and school events. I have been blessed with family and close friends who have supported me at every turn. And although my parents are both deceased, I believe my core value of service to others emanated from them.

For over 30 years, I have served the public in roles offering me an intimate view of challenges faced by ordinary Americans. As a young man serving as a paramedic/firefighter, I cared for people experiencing homelessness, domestic violence, and mental illness. This work established a foundation of care, compassion, and empathy towards all people that permeates my professional career.

During my service at the Department of Justice, I investigated and held accountable individuals violating our Nation’s laws. I proudly led many brave public servants engaged in supporting rule of law efforts overseas following the terrorist attacks on September 11, 2001. And I reimagined an initiative that sought to revisit prison sentences for certain individuals sentenced under drug laws of the 1990s. Collectively, this arc of public service has shaped who I am personally and professionally:

- I am a thoughtful, independent, and objective seeker of facts,
- I believe that Government service should embrace and promote the value of transparency and integrity, and
- I believe there is no greater honor than service to the American people.

In the private sector, many of these common threads readily transferred to compliance and ethics teams I have worked with in the financial services industry: in particular, integrity, accountability, and transparency. Effective and meaningful risk management requires complete, honest, and transparent assessments, investigations, and reporting.

As Chief of Staff in the Compliance and Ethics department of a Fortune 100 company, I helped ensure the department maintained sound financial practices and used strategic communications to support departmental operations. Furthermore, I have developed, grown, and led teams enhancing regulatory and Board reporting. I also challenged the business to strengthen internal controls, refined independent testing, and helped ensure the proper remediation of any findings. These combined efforts focused on guiding teams to be well-managed, efficient, and effective.

Currently, I lead the Office of Corporate Investigations. Here, my teams conduct rigorous and independent investigations into allegations of insider fraud, whistleblower claims, and unethical business practices.

FHFA has a vital role in maintaining the stability and liquidity of the mortgage market, and it furthers equal and affordable access to America’s housing market. The Agency’s role is unique because it acts as both regulator and conservator to Fannie Mae and Freddie Mac, and as regulator of the Federal Home Loan Bank System. That is why it is critical to the American people that the Office of Inspector General (OIG) fulfill its core mission, which is to promote economy, efficiency, and effectiveness while also protecting FHFA and the entities it regulates against fraud, waste, and abuse.

Since 1978, Inspectors General (IGs) have been independent, objective, and nonpartisan finders of fact. They and their staff have saved the Government substantial monies, held criminals accountable, and endeavored to have our Government work better. The key to their success is the ability to remain independent and objective—to put it simply, to call balls and strikes. Their duty to report and be responsive to Congress is an equally important function driving transparency in how our Government’s departments and agencies are functioning. The independence of an IG does not make them immune from accountability for their actions. In fact, the very nature of the IG role requires more than just avoiding conflicts of interests or the appearance of a conflict of interest: IGs must set the bar and hold themselves to the highest standards of ethics and integrity.
If confirmed as the FHFA Inspector General, I will exercise my duties with the same level of independence and objectivity that has defined my entire professional career. I will ensure FHFA OIG conducts its audits, evaluations, and investigations in a transparent, professional, thoughtful, fair, and rigorous manner. I commit to a transparent and responsive relationship with this Committee and Congress. I will endeavor to develop a productive, thoughtful working relationship with the FHFA Director, as an effective relationship will best serve the Agency, the entities it supervises, and the American public. Moreover, I will lead FHFA OIG with candor, transparency, and humility.

For me and many in my family, the call to public service is strong. We have a long tradition of military, Government, first responder, and other frontline workers who, like me, believe caring for and protecting our fellow citizens is the highest honor. My three decades of public service share several common themes: independence, integrity, and a belief in the honor of service to the American people. My personal journey leading up to this nomination has well-prepared me for the challenge of this important position. If confirmed, I very much look forward to the opportunity to serve this great country once again.

Thank you. I look forward to your questions.
## STATEMENT FOR COMPLETION BY PRESIDENTIAL NOMINEES

Name: Tommy (Last) Brian (First) Michael (middle) (Dilero)

Position to which nominated: Inspector General, Federal Housing Finance Agency

Date of nomination: 10/19/21

City of Residence: Reston, Virginia

<table>
<thead>
<tr>
<th>Education</th>
<th>Institution</th>
<th>Dates Attended</th>
<th>Degrees Received</th>
<th>Dates of Degree</th>
</tr>
</thead>
<tbody>
<tr>
<td>University of Maine</td>
<td>08/2003-05/2006</td>
<td>Juris Doctor</td>
<td>05/2006</td>
<td></td>
</tr>
<tr>
<td>University of New England</td>
<td>12/1999-12/2000</td>
<td>B.S. Organizational Leadership</td>
<td>05/2001</td>
<td></td>
</tr>
<tr>
<td>*Certain individual courses contributing to this degree began – 1987</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>University of Southern Maine</td>
<td>Summer 2000</td>
<td>Single course (Dev. Psych 2000)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Nominees should provide information for all institutions attended, whether or not the nominee was granted a degree by the institution

Honors and awards: List below all scholarships, fellowships, honorary degrees, military medals, honorary society memberships and any other special recognitions for outstanding service or achievement.

- Attorney General’s Honors Class of 2006
- All-American Scholar
- Outstanding Academic Achievement (University of New England)
- Marjorie Baird Scholarship (Maine Law)
- Israel Bernstein Scholarship (Maine Law)
- Four-time recipient of the DOJ Meritorious Award for Outstanding Performance
- Superior Law Enforcement Partnership Award from the International Criminal Investigative Training Assistance Program (ICT/IAPI, Department of Justice)
- Esprit de Corps Award, Portland, Maine, Fire Department
Membership:
List below all memberships and offices held in professional, fraternal, business, scholarly, civic, social, charitable and other organizations.

<table>
<thead>
<tr>
<th>Organization</th>
<th>Office Held (Easly)</th>
<th>Dates of Membership</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maine Teachers Association*</td>
<td>N/A</td>
<td>1990-1995</td>
</tr>
<tr>
<td>American Bar Association</td>
<td>N/A</td>
<td>2006-2020 (not consecutive years)</td>
</tr>
</tbody>
</table>
*prior to formally merging with the IAFF, parameters were members of the MTA for the purposes of contractual matters with the City of Portland, Maine.

Employment record: List below all positions held since graduation from college including the title or description of job, name of employer, location of work, and inclusive dates of employment.

**Capital One Financial Corporation, McLean, VA** 2017-CURRENT
Head of Corporate Investigations – Compliance and Ethics (formerly Operational and Compliance Risk Management)

(January 2020-Current) I led the intake, triage, research, and field investigation teams responsible for coordinating the company’s internal fraud, Bank Robbery Act/Foreign Corrupt Practices Act, cybercrime, extortion, internal financial stimulus investigations, and other unethical business practice investigations across the business worldwide.

Chief of Staff – Operational and Compliance Risk Management

(December 2018-January 2020) I led efforts to define the operating model and management structure for a then newly organized Operational and Compliance Risk Management department – consisting of Corporate Compliance, Anti-money laundering, and Operational Risk & Oversight (Operational Risk, Ethics & Investigations, Insider Threat, External Fraud, Cyber Risk Management). I also acted as an advisor and strategic thought partner to the company’s Chief Compliance and Ethics Officer (and the Senior Vice President over Operational Risk & Oversight) with responsibility for coordinating the department’s budget activities, human capital management, and strategic communications.

Head of Governance & Independent Compliance Transaction Testing – Global Card Compliance

(March 2017-December 2018) I led the local governance and independent testing functions, focused on driving effective control coverage, worked to identify compliance breakdowns, and delivered quality regulatory and Board reporting.

**U.S. Department of Justice, Washington, DC** 2006-2017
Office of the Deputy Attorney General
Associate Deputy Attorney General (2016-2017)
Senior Counsel to the Deputy Attorney General (2015)
Rule of Law Counsel (2009)
In each of these roles, I acted as an advisor to the Attorney General and Deputy Attorney General on certain international and domestic matters. More specifically, I directed teams of federal prosecutors and attorneys engaged in anti-corruption and other rule of efforts in Afghanistan and Iraq; and maintained Departmental coordination of related federal law enforcement activity. I also worked to re-imagine the Department’s efforts in the Administration’s Global Initiative, was approved to act as a management representative in EEO matters, and served approximately one year as a member of the Attorney General’s Capital Case Committee.

Criminal Division, Narcotic and Dangerous Drug Section 2006-2009
Trial Attorney

I investigated complex transnational drug trafficking and narcotics organizations, including grand jury, jury trial, and appellate experience. Moreover, I conducted research and offered policy guidance to Department leadership on narcotics and national security-related matters, including novel areas of law such as cyberterrorism.

Criminal Division (current National Security Division), Counterterrorism Section 2005-2006
Legal Intern (during 3L and 3L year)

U.S. Attorney’s Office, District of Maine 2004-2005
Legal Intern (rising 2L and 2L year)

Portland, Maine, Fire Department 1993-2003
Paramedic/First Responder

Note: I also held several part-time EMS/fire related roles (noted below) that cover the college years. Prior to law school, my academic studies took place while working full-time.

Maine Medical Center 1989-1996 (ext)
Poison Information Specialist

A staff member of the Maine Poison Center, I provided recommendations to the lay public as well as medical providers on the proper course of treatment concerning possible exposure to poisons and other toxins.

Government Experience:
List any experience in or direct association with Federal, State, or local governments including any advisory, consultative, honorary or other (including part-time) service or positions.

<table>
<thead>
<tr>
<th>Name of Government Entity</th>
<th>Position</th>
<th>Dates of Service</th>
</tr>
</thead>
<tbody>
<tr>
<td>Department of Justice</td>
<td>Intern/Trial Attorney/DAG</td>
<td>2005-2017</td>
</tr>
<tr>
<td>U.S. Attorney’s Office</td>
<td>Intern</td>
<td>2004-2005</td>
</tr>
<tr>
<td>Portland, Maine Fire Department</td>
<td>Paramedic/First Responder</td>
<td>1990-2003</td>
</tr>
<tr>
<td>Cape Elizabeth, Maine Police Department</td>
<td>EMT 911 Dispatcher</td>
<td>1995-1998 (ext)</td>
</tr>
<tr>
<td>Portland, Maine Police Department</td>
<td>911 Dispatcher</td>
<td>1988-1989 (ext)</td>
</tr>
<tr>
<td>Cape Elizabeth, Maine Fire Department</td>
<td>Volunteer</td>
<td>1985-2013 (ext)</td>
</tr>
<tr>
<td>Westbrook, Maine Fire Department</td>
<td>EMT Paramedic</td>
<td>1989-1990 (ext)</td>
</tr>
<tr>
<td>York Volunteer Ambulance, Yarmouth, Maine</td>
<td>Per diem Paramedic</td>
<td>1993 (ext)</td>
</tr>
</tbody>
</table>
Published writings: List the titles, publishers and dates of books, articles, reports and other published materials you have written. The list should include any publicly accessible publications on the internet in the past ten years, including appropriate URLs for any posts on blogs you maintained or contributed to, and URLs for any other significant internet-based postings during that same period. If available, provide the Committee with one digital copy of each of the writings you list.


https://core.ac.uk/download/pdf/234111014.pdf

Rule of Law Handbook: A Practitioner’s Guide for Judges Advocates. The Judge Advocate General’s Legal Center & School, U.S. Army Center for Law and Military Operations, 2015, contributing author. [Note: additional editions of this handbook may contain my input (providing updated information); however, I am unable to locate the other editions.]


Speeches and presentations: List all of the formal speeches and presentations (e.g., PowerPoint) you have delivered during the past ten years which are on topics relevant to the position for which you have been nominated, including dates. If available, provide the Committee with one digital copy of each formal speech and presentation. If text is no longer available, list the date, place, and organization or group to whom you made the speech or presentation.

None directly relevant

Public statements: List all public statements you have made during the past ten years which are on topics relevant to the position for which you have been nominated, including dates. Whenever possible, provide the Committee with finding aids (such as citations, Internet URLs, etc.) for each statement.

None

Social media usernames: Please provide a list of all of your currently active social media usernames (e.g., Facebook, Instagram, Twitter, etc.), and any usernames for any inactive accounts you have used within the previous ten years.

https://www.facebook.com/https.termer?

https://www.linkedin.com/in/bryantiomney24a85856/

https://twitter.com/graywatch011
Political affiliations: List memberships and offices held in and services rendered to all political parties or election committees during the last ten years.

Biden Campaign, Democracy Reform Policy Committee, 2020

List all public offices, if any, for which you have been a candidate in the past ten years.

<table>
<thead>
<tr>
<th>Name of Office</th>
<th>Elected/Appointed</th>
<th>Year(s) Election Held or Appointment Made</th>
<th>Terms of Service</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Political contributions: Itemize all political contributions which exceed $200 or which aggregate to over $200 in a calendar year to any individual, campaign organization, political party, political action committee or similar entity during the last ten years and identify specific amounts, dates, and names of recipients.

None

Qualifications: State fully your qualifications to serve in the position to which you have been named. (Attach sheet)

See attached.

Future Employment relationships:

1. Indicate whether you will sever all connections with your present employer, business firm, association or organization if you are confirmed by the Senate.

   Yes.

2. As far as can be foreseen, state whether you have any plans after completing government service to resume employment, affiliation or practice with your previous employer, business firm, association or organization.

   No.

3. Has anyone made a commitment to employ you after you leave government service?

   No.

4. Do you expect to serve the full term for which you have been appointed?
Potential conflicts of interests:

1. Describe any financial arrangements or deferred compensation agreements or other
commingling dealings with business associates, clients or customers who will be affected
by policies which you will influence in the position to which you have been nominated.

None.

2. List any investments, obligations, liabilities, or other relationships which might involve
potential conflicts of interest with the position to which you have been nominated.

None. All my investments are part of commonly held large public and diverse funds.

3. Describe any business relationship, dealing or financial transaction (other than tax
paying) which you have had during the last ten years with the Federal Government,
whether for yourself, on behalf of a client, or acting as an agent, that might in any way
constitute or result in a possible conflict of interest with the position to which you have
been nominated.

None.

4. List any lobbying activity during the past ten years in which you have engaged in for
the purpose of directly or indirectly influencing the passage, defeat or modification of any
legislation at the national level of government or affecting the administration and
execution of national law or public policy.

None.

5. Explain how you will resolve any conflict of interest that may be disclosed by your
responses to the items above.

To the extent any real or perceived conflict of interest is identified, I will follow the
recommendation provided to me by government ethics officials.

Tax compliance and bankruptcy:

1. In the past ten years, have you and your spouse (if applicable) filed and paid all taxes
(federal, state, and local) as of the date of your nomination? Indicate if you filed as
'married filing separately':

Yes.

2. In the past ten years, have you been required to make any back tax payments? If so,
indicate if you have made any back tax payments and provide full details.

No.
3. Has a tax lien or other collection procedure(s) been instituted against you or your spouse (if applicable) by federal, state, or local authorities? If so, provide full details.

No.

4. In the past ten years, have you or your spouse (if applicable) ever been the subject of any audit, investigation, or inquiry by federal, state, or local taxes? If so, provide full details.

My 2013 federal tax return did not match what the IRS had on file and I received a letter of inquiry. The inconsistency was caused by a title company sending incorrect information to the IRS following the sale of my home. Upon providing the IRS a copy of the real estate closing documents, the inquiry was closed with no further action. My 2013 tax return was accurately filed.

5. Were all your Federal, State, local, and other tax returns and tax liabilities of any kind current (filed and paid when due) as of the date of your nomination? If not, provide details.

Yes.

6. Have you ever filed for bankruptcy? If so, provide details.

No.

**Civil, criminal and investigatory actions:**

1. Have you ever been the subject of a complaint or been investigated, disciplined, or otherwise cited for a breach of ethics for unprofessional conduct before any court, administrative agency (e.g., an Inspector General's office), professional association, disciplinary committee, or other ethics enforcement entity at any time? If so, provide details, regardless of outcome.

No.

2. Have you ever been investigated, arrested, charged, or held by any Federal, State, or other law enforcement authority for a violation of any Federal, State, county or municipal law, regulation, or ordinance, other than a minor traffic offense? If so, provide details.

No.

3. Have you ever been involved as a party in interest in any administrative agency proceeding, or civil litigation other than a divorce proceeding? If so, provide details.

No.

4. Have you ever been convicted (including pleas of guilty or nolo contendere) of any criminal violation other than a minor traffic offense? If so, provide details.
No.

Other information: Please advise the Committee of any additional information, favorable or unfavorable, which you believe should be considered in connection with your nomination.

None.

Public records search: Do you consent to allow Committee staff to conduct a public records search on you using appropriate search tools? (including Westlaw, Lexis, etc.)

Yes.

The undersigned certifies that the information contained in the public statement to the Committee is true and correct.

Signed: [Signature]

Date: 11/23/21
TOMNEY QUALIFICATION STATEMENT

For over thirty years, I have dedicated myself to public service. That service has provided me an intimate view of the challenges faced by ordinary Americans. I have had the opportunity to investigate and hold accountable individuals violating our Nation's laws, and I was proud to lead many brave individuals engaged in supporting rule of law efforts overseas following the terrorist attacks on September 11, 2001. These three decades of public service have several common themes:

- I have a lifetime of being an independent and objective seeker of facts;
- I believe that government service should embrace and promote the value of transparency and integrity;
- I have extensive leadership experience in the most challenging of circumstances; and
- I believe there is no greater honor than service to the American people.

In the private sector, I found many of these common themes readily transferred to compliance and ethics teams within the highly regulated financial services industry; in particular, integrity, accountability, and transparency. I deeply believe that effective and meaningful risk management requires complete, honest, and transparent assessments, investigations, and reporting. As Chief of Staff to the Compliance and Ethics department of a Fortune 500 company, I led efforts to define the operating model and management routines for a freshly organized risk management department consisting of nearly 2000 associates and contractors, which included anti-money laundering, compliance, ethics, external and internal fraud risk management, and operational risk management teams. I have developed, grown, and led teams enhancing compliance regulatory and Board reporting, endeavored to strengthen internal controls, refined independent testing, and helped to ensure the proper direction of any findings— all a focused effort at guiding various teams to be well-managed, efficient, and effective. And currently, I lead the Office of Corporate Investigations for this company where we conduct rigorous and independent investigations into reports of alleged insider fraud or unethical business practices.

If confirmed as the FHFA Inspector General, I will exercise my duties with the same level of independence, objectivity, and integrity that has defined my entire professional career. I will ensure the FHFA OIG conducts its audits, evaluations, and investigations in a professional, thoughtful, fair, rigorous, and transparent manner. I commit to a transparent and responsive relationship to this Committee and to Congress. I will endeavor to develop a productive working relationship with the FHFA Director, as such an effective relationship will best serve the agency, the entities it supervises, and the American public. I will lead the FHFA OIG with candor, transparency, and humility. And I look forward to playing an active and transparent role supporting the work of the Council of the Inspectors General on Integrity and Efficiency.

For me and many in my family, the call to public service is strong. We have a long tradition of military, first responder, and other front-line workers who, like me, believe caring for and protecting our fellow citizens is the highest honor. My personal journey to this nomination has well-prepared me for the challenge of this critically important position. If confirmed, I look forward to the opportunity to serve this great Country once again.
Q.1. Where have you excelled in past and current positions in attracting, hiring, and promoting people of color in positions in your organization? Where might there be room for improvement?

A.1. I am a first generation American and a woman. Diversity and inclusion are important to me, personally. I understand that commitment to having a diverse workforce starts at the top. In every position that I have held within the Federal Government, whether as a GS–14 hiring manager or a career Senior Executive, I have hired and promoted people of color and those who identify with other marginalized identity groups, because I believe that diversity of thought and a varied lens by which we see the world strengthens any team.

Through hirings or internal promotions I have taken advancing diversity seriously to implement what I believe in: that promoting qualified individuals from underrepresented communities, including people of color and minorities, matters.

I am an active member of CIGIE's Diversity, Equity, and Inclusion working group. Additionally, in my current position as Chief of Staff at the Department of State OIG, I directly hired four individuals, three of whom identified themselves as people of color or belonging to a minority group. In addition, I participated in many panel interviews on behalf of others within the State OIG leadership group and actively ensured that diversity is a consideration in many of those hires. I work with State OIG's Diversity and Inclusion council as well as Human Resources to ensure that we find creative ways of engaging with Historically Black Colleges and Universities to attract talent. I worked at USAID OIG's Office of Management, and led a group of about 90 professionals, many of whom I promoted. My team was the most diverse group within the organization. At Ex-Im OIG, I promoted people of color to higher positions of influence. While at the Department of Agriculture, the majority of my staff, some of whom I hired, identified themselves as people of color.

Q.2. What is your plan for creating an inclusive working environment for employees within your office?

A.2. If confirmed, I plan to create an inclusive working environment by:

1. Ensuring Ex-Im OIG's performance and strategic plans include diversity and equity goals and objectives.
2. Partnering with the CIGIE Diversity, Equity, and Inclusion working group to remain informed of best practices to attract and recruit diverse talent.
3. Working with my team's hiring managers to promote attracting, hiring, and retaining diverse talent.
4. Initiating open conversations within Ex-Im OIG regarding diversity and inclusion as a regular meeting as appropriate.
5. Empowering my staff to review the policies and procedures of the Bank, with an eye towards diversity and inclusion. In other words, when possible, our audits or evaluations will con-
tain recommendations on how Ex-Im can improve its performance regarding issues of equity and inclusion.

RESPONSES TO WRITTEN QUESTIONS OF SENATOR TOOMEY FROM PARISA SALEHI

Q.1. Congressional Oversight—Please provide your philosophy on how the Export-Import Bank of the United States (Ex-Im) will approach and respond to Congressional information requests (both for documentary information and oral testimony), if you are confirmed.

A.1. Congress created the offices of inspector general (OIGs) to assist in its oversight of the Executive branch. If confirmed as the Inspector General at Ex-Im, I will lead Ex-Im’s OIG to share information in a transparent and nonpartisan fashion and according to the law. This will apply to both testimonies and written products such as audits, evaluations, and reviews. Timeliness in reporting is also a key element of effective oversight, and without timely Ex-Im OIG reports, Ex-Im’s ability to respond to such oversight efforts and Congress’ ability to conduct effective oversight of Ex-Im’s operations are limited. Therefore, I will be focused on timely and transparent oversight, if confirmed.

Additionally, if confirmed, my role will be to make recommendations to the Bank’s Chairman on how to improve Ex-Im’s relationships with Congress, as part of any potential audits or evaluations that my office might conduct.

Q.2. If confirmed, do you intend to respond to information requests differently depending on who is making the Congressional information request (whether it’s the chair of the Congressional committee, the Ranking Member, or another member of Congress)? Please answer “yes” or “no.” If your answer is “yes,” please explain.

A.2. If confirmed as the Inspector General, I will lead Ex-Im’s OIG to share information in a transparent and nonpartisan fashion and according to the law. I plan to respond to information requests from all stakeholders. In the event of specific requests, I will ensure that Ex-Im OIG works closely with Congressional staff to provide timely and useful information, should I be confirmed.

Q.3. Will you commit that, if confirmed, you will respond in a timely manner and fully comply with all information requests from me? Please answer “yes” or “no.” If your answer is “no,” please explain.

A.3. If confirmed, I commit to respond in a timely manner and fully comply with information requests by you and all stakeholders in accordance with the law and through Ex-Im OIG’s audits and evaluations or reviews.

Q.4. Will you commit that, if confirmed, you will make yourself and any other Ex-Im employee expeditiously available to provide oral testimony (including but not limited to briefings, hearings, and transcribed interviews) to the Committee on any matter within its jurisdiction, upon the request of either the Chairman or Ranking Member? Please answer “yes” or “no.” If your answer is “no,” please explain why.

A.4. I commit to making myself and other Ex-Im OIG employees available to provide oral testimony to the Committee on any matter
within its jurisdiction, upon the request of either the Chairman or Ranking Member.

Q.5. Do you believe that Ex-Im or Ex-Im’s Office of the Inspector General (OIG) may assert any privileges or other legal justifications to withhold information (whether records or oral testimony) from Congress? Please answer “yes” or “no.”

A.5. If confirmed as the Inspector General, I will lead Ex-Im’s OIG to share information in a transparent and nonpartisan fashion and according to the law. While disclosing information to Congress with transparency and in a nonpartisan manner will be my guiding principle, if the law requires and thus prohibits Ex-Im OIG not to disclose the information, I must follow the law.

Q.6. If you answered “yes” to the preceding question, please list every such privilege or other legal justification and provide the legal basis for why you believe Ex-Im or Ex-Im’s OIG may use such privilege or legal justification to withhold information from Congress.

A.6. I am not currently familiar with any Ex-Im specific privileges or legal justifications to withhold information. However, in my general oversight experience, in circumstances when, on balance, disclosing the information might not be permissible, I commit to seek the advice of counsel, as well as those in the Inspectors General community, such as CIGIE, who have the expertise to guide me in identifying what information I would be legally permitted to share. Some examples of the type of information that may not be disclosed, absent extraordinary justification, might be:

1. Personally Identifiable Information to safeguard, for example, a whistleblower’s identity during an ongoing investigation (to avoid a chilling impact on disclosing wrongdoing);
2. Information about an open criminal investigation (to comply with the law);
3. Executive Privilege (this privilege belongs to the Agency and not the OIG, therefore, OIG may not waive the privilege);
4. When otherwise required by the law.

Q.7. In an effort to be open and transparent with Congress and the public, will you commit not to assert any such privilege or legal justification against Congress that you listed above? If not, why not? If so, please identify all such privileges or legal justifications that you will commit to not assert against Congress.

A.7. I will commit to transparent and open communication whenever legally permissible. Additionally, I commit to seek the advice of counsel, as well as those in the Inspectors General community, such as CIGIE, who have the expertise to guide me in identifying what information I would be legally permitted to share.

Q.8. Private Sector Financing—During the December 7, 2021, Banking Committee hearing for your nomination, I asked you: “if you would commit to conduct another evaluation to determine if Ex-Im is in fact complying with its updated policies and procedures that are designed to prevent crowding out of private sector capital, and also will you commit to reviewing the updated policies themselves to ensure that they are actually achieving Ex-Im’s statutory
mandate not to replace private capital?” In your response, you did not commit to conduct an evaluation of Ex-Im’s updated additionality policies. However, during the hearing you were willing to commit to at least one other Senator’s request for a commitment.

Will you commit to conduct an evaluation of Ex-Im’s updated additionality policies?

A.8. Congress created offices of inspector general in 1978 to assist in its oversight of the executive branch. As a member of the IG community, I believe my duty in assisting Congress is paramount. As the Inspector General, it is my role to review the policies and procedures of the Bank to ensure they are in accordance with the law and the Congressional intent. Therefore, should I be confirmed, I commit to working with you and your staff to fully understand your concerns relating to additionality as part of my oversight of the Bank. Though I do not currently hold a position at Ex-Im OIG, and therefore am not aware of Ex-Im OIG’s workload, staffing challenges, or priorities, I commit to working with my staff at Ex-Im OIG to ensure that the timing of a follow-on review produces relevant recommendations to Ex-Im and Congress, so that Ex-Im supplements and encourages private capital as opposed to competing with it.

Q.9. If the answer is “no,” can you please explain the reason why you will not commit to this evaluation?

A.9. N/A.

Q.10. Priorities as Inspector General—During the December 7, 2021, Banking Committee hearing for your nomination, Senator Bob Menendez (D-NJ) asked you: “so how would you help Ex-Im improve their performance when it comes to the issues of racial equity?”

In your response, you stated: “...this issue of diversity and inclusion is a priority of mine. It’s a very important issue and I hope that when, and if I am confirmed, to be able to basically bring that tone of, the fact that diversity matters, at the top and ensure that my Ex-Im OIG staff finds areas of opportunity in, when they do their work of audits and inspections and evaluations, with an eye towards diversity, inclusion and this priority. I also would like to make sure my own staff within Ex-Im OIG is empowered to think through these issues of diversity and inclusion and include them wherever possible for management of the Bank to think through them.”

Can you elaborate further on how you would operationalize your diversity and inclusion priority?

A.10. If confirmed, I would operationalize my commitment to diversity and inclusion concepts by:

1. Ensuring Ex-Im OIG’s performance and strategic plans include diversity and equity goals and objectives.
2. Partnering with CIGIE Diversity, Equity, and Inclusion working group to have best practices top of mind.
3. Working with my team’s hiring managers to promote attracting, hiring, and retaining diverse talent.
4. Initiating open conversations within Ex-Im OIG regarding diversity and inclusion as a regular meeting at the frequency that suits my staff.

5. Empowering my staff to review the policies and procedures of the Bank, with an eye towards diversity and inclusion. In other words, when possible, our audits or evaluations would contain recommendations on how Ex-Im can improve its performance regarding issues of equity and inclusion.

Q.11. Please list additional priorities that you have as Ex-Im’s Inspector General, if confirmed.

A.11. If confirmed, in consultation with my Ex-Im OIG staff, I would like to understand the organizational priorities that we should focus on to possibly include:

1. Review the new programs and policies of Ex-Im, as a result of the 2019 Reauthorization of the Bank, so that we can provide timely and transparent information to Congress and to the Chairman of Ex-Im through our audits, evaluations, and reviews, to ensure taxpayer protections.

2. Thoroughly investigate all allegations of fraud and misconduct to deter waste, fraud, and abuse.

3. Perform a workforce analysis to ensure that Ex-Im OIG has the resources that it needs to function as an effective oversight body, which is especially important as the office has been without a PAS IG since June, 2014.

Q.12. Have you had any discussions with the White House, Ex-Im, or Ex-Im’s OIG staff about potential OIG priorities if you’re confirmed? If so, please identify the priorities and explain what, if any, potential changes and modifications that may result from the priorities.

A.12. I have not had any discussion with White House, Ex-Im, or Ex-Im’s OIG staff about potential OIG priorities.

Q.13. Fraud From COVID–19 Legislation/Measures—Ex-Im’s OIG Semiannual Report to Congress that was released last month states the OIG anticipates an increase in suspicious transactions due to the COVID–19 pandemic. The report points to other investigative agencies that are overwhelmed by fraud stemming from COVID–19 related legislation such as the CARES Act and other relief measures.

Given the potential large amount of fraud that is expected to arise over the coming years, what steps will you take to ensure proper oversight of Ex-Im’s transactions?

A.13. If confirmed, I would consult with my staff on how to take the following steps:

1. Knowing that Ex-Im has created special initiatives in response to the COVID–19 pandemic, understand the impact of these measures on the Bank’s mission of supporting American jobs by leveling the playing field.

2. Trace financial transactions, both as a routine part of any of our investigations of suspicious activities, and to oversee Ex-Im’s efforts in being a good steward of taxpayers’ monies.
3. Collaborate with other Government oversight bodies in an effort to build on their experiences in understanding the nature of these bad acts and to recommend preventative measures and internal controls to Ex-Im.

Q.14. The Ex-Im OIG Fiscal Year 2022 Congressional Budget Justification indicates the OIG has 26 full-time equivalent employees (FTE). Do you anticipate requesting additional OIG FTEs as result of an increase in suspicious transactions stemming from the pandemic?

A.14. If confirmed, I hope to perform a workforce analysis and consult with the current staff to ensure that we have the FTEs as well as a sufficient budget to be able to function as an effective oversight body, and request for an increase in OIG FTEs if it is determined that the current staff is unable to perform any additional and necessary work.

Q.15. Climate Policies on Ex-Im Financing—Ex-Im has long been financing energy related projects. In its 2020 Annual Report, Ex-Im reported that oil and gas represented 25.6 percent of its total exposure. However, given the Biden administration’s favoritism for renewable and sustainable energy projects, there may be pressure within Ex-Im to reevaluate these past deals and refrain from financing oil and natural gas deals in the future.

Will you commit to investigating any reports or allegations of political interference occurring during Ex-Im’s evaluation and decision making surrounding the issue of whether or not Ex-Im will support a fossil-fuel related loan, financing, or project?

A.15. Accountability for the exercise of Government authority is key to our Nation’s governing ethical principles. Independent Government audits, in turn, provide essential accountability and transparency over Government programs and operations by providing objective analysis and information to decisionmakers and the public. I will commit to overseeing the review of any allegation of wrongdoing independently and swiftly. That is the core function of any OIG.

Q.16. Answering Questions for the Record—Please describe with particularity the process by which you answered these questions for the record, including identifying who assisted you in answering these questions along with a brief description of their assistance.

A.16. I received the questions Friday 12/10/2021, in the afternoon. I drafted my responses to these questions the same day. On Saturday 12/11/21, I read my initial answers and made a few edits. I finalized my responses on Monday 12/13/21, and submitted them to the Ex-Im liaison for transmittal to the Senate Banking Committee.

RESPONSES TO WRITTEN QUESTIONS OF SENATOR SINEMA FROM PARISA SALEHI

Q.1. In your current capacity as Acting Inspector General, how do you assess the efficiency of existing Ex-Im programs and the efficacy of existing taxpayer protections?
A.1. I currently serve as the Chief of Staff at the Department of State OIG. I did, however, serve as the Acting Inspector General for Ex-Im in 2018–2019. In that role, I assessed the efficiency and effectiveness of the programs through conducting fact-based, data driven audits, evaluations, inspections and reviews. Through these reviews, OIGs make recommendations to the agency that they oversee on how to improve their policies and operations in order to ensure that the agency is acting as a responsible steward of taxpayer’s monies. If confirmed, I will consult with my staff and all stakeholders, including Congress, to ensure that my office engages in impactful oversight and to ensure Ex-Im is acting as a responsible steward of taxpayers’ monies.

Q.2. If confirmed, what reforms would you consider making to processes within your purview to improve oversight at Ex-Im and protect the public trust?

A.2. If confirmed, I will:

1. Consult with my Ex-Im OIG staff who are currently working at the Bank and know the programs and the operations of the Bank well.
2. Engage in a risk-based exercise to plan our work and decide which processes and operations of the Bank we will examine near and long term. In that planning we will ensure to consider all stakeholders’ views regarding any potential reforms.
3. Consider whether we have the necessary resources and tools for effective oversight and to perform the audits and evaluations necessary to recommend reforms to Ex-Im.
4. Review Ex-Im OIG’s strategic and performance plans with an eye towards improving our oversight.
5. Report the findings of any reports regarding reforms to Congress, the Chairman of the Bank, and the American people transparently and independently.

RESPONSES TO WRITTEN QUESTIONS OF CHAIRMAN BROWN FROM BRIAN MICHAEL TOMNEY

Q.1. Where have you excelled in past and current positions in attracting, hiring, and promoting people of color in positions in your organization? Where might there be room for improvement?

A.1. Attracting, hiring, and promoting people of color, as well as individuals from other diverse backgrounds, has been a core value of mine throughout my professional career. In particular, I am proud to have deployed a diverse team of attorneys and staff to historically less inclusive places such as Afghanistan. Leading by example in these distant locations not only supported the importance of diversity here at home, but it also gave hope and resilience to some historically brutalized minority communities living overseas. More recently, I have attracted, hired, and promoted individuals of color in my current role leading internal fraud investigations. A team of investigators who more accurately represent the diversity of the company helps to ensure our investigations are thoughtful and fair, and drives consistent outcomes across the organization.
To be sure, there is always room for improvement. As an initial matter, acknowledging and remaining mindful of implicit bias in our everyday life and work is critical. If confirmed, I look forward to consulting with other Inspectors General to consider their best practices in this space and leverage their collective wisdom to help me (and my team) avoid blind spots.

Q.2. What is your plan for creating an inclusive working environment for employees within your office?

A.2. An inclusive working environment starts with creating a safe place to express ideas and welcoming people of all backgrounds. Accomplishing this imperative starts at the top of any organization. If confirmed, it will start with me. I will lead by example and commit to a candid, respectful, and transparent office environment that welcomes a diversity of people and thoughts. Moreover, I will ensure that my senior leadership team follows my lead. An inclusive, respectful office environment ultimately leads to innovation, makes us work smarter, and helps to ensure that we respect each other as individuals. If confirmed, I look forward to consulting with other Inspectors General to consider their best practices in this space and leverage their collective wisdom to help me (and my team) avoid blind spots.

RESPONSES TO WRITTEN QUESTIONS OF SENATOR TOOMEY
FROM BRIAN MICHAEL TOMNEY

Q.1. Congressional Oversight—What is your philosophy on how the Federal Housing Finance Agency's Office of Inspector General (OIG) should respond to Congressional information requests (both documentary information and oral testimony)?

A.1. Consistent with the Inspector General Act of 1978, FHFA OIG should respond to Congressional information requests (both documentary information and oral testimony) fully, transparently, and timely. If confirmed, I am committed to and look forward to developing a positive, candid, and timely responsive relationship with Congress.

Q.2. If confirmed, do you intend to respond to information requests differently depending on who is making the Congressional information request (whether it is the chair of the Congressional committee, the Ranking Member, or another member of Congress)? Please answer “yes” or “no.” If your answer is “yes,” please explain.

A.2. No.

Q.3. Will you commit that, if confirmed, you will timely respond to and fully comply with all information requests from me? Please answer “yes” or “no.” If your answer is “no,” please explain.

A.3. Yes.

Q.4. Will you commit that, if confirmed, you will make yourself and any other OIG employee expeditiously available to provide oral testimony (including but not limited to briefings, hearings, and transcribed interviews) to the Committee on any matter within its jurisdiction, upon the request of either the Chairman or Ranking Member? Please answer “yes” or “no.” If your answer is “no,” please explain why.
A.4. Yes.

Q.5. Mission—How would you describe the OIG’s mission?

A.5. The mission of FHFA OIG is to promote economy, efficiency, and effectiveness and protect FHFA and the entities it regulates against fraud, waste, and abuse, contributing to the liquidity and stability of the Nation’s housing finance system. FHFA OIG accomplishes this mission by providing independent, relevant, timely, and transparent oversight of the Agency in order to promote accountability, integrity, economy, and efficiency; advising the Director of the Agency and Congress; informing the public; and engaging in robust enforcement efforts to protect the interests of the American taxpayers.

Q.6. How would you describe the OIG’s responsibilities as they relate to fraud, waste, and abuse at FHFA’s regulated entities?

A.6. FHFA OIG is vested with statutory law enforcement authority to conduct criminal and civil investigations of individuals, whether inside or outside of Government, who waste, steal, or abuse Government monies in connection with programs and operations of FHFA and the entities it regulates. If confirmed, I will ensure the Office of Investigations continues to conduct its work in a fair and thorough manner, and in accordance with all applicable professional standards.

Similarly, OIG must conduct meaningful audits, evaluations, and other assessments of FHFA and the regulated entities and regularly inform the Agency and Congress of identified wasteful or abusive practices.

Q.7. Risk Assessments—The OIG uses a risk-based oversight strategy. Will you commit to promptly review and, as appropriate, adjust the existing risk assessments that guide the OIG’s oversight?

A.7. If confirmed, I look forward to reviewing the breadth of OIG operations to include how it leverages its risk-based oversight strategy to guide its activities. As necessary, I will adjust existing risk assessments that guide OIG’s oversight. Moreover, I remain committed to regular and ongoing assessments of these processes.

Q.8. What data and other information will you consider in reviewing and adjusting the OIG’s existing risk assessments?

A.8. While reviewing OIG’s risk-based oversight strategy, if confirmed, I look forward to benchmarking the processes used by other OIGs, factoring in relevant internal documents, and seeking out key stakeholder input (e.g., subject matter experts, Agency leadership, and Congress).

Q.9. Is there a role for outside or third-party information to be used in reviewing and adjusting the OIG’s existing risk assessments?

A.9. Yes. A thoughtful review of FHFA OIG’s risk-based strategy need not be artificially constrained. Outside or third-party information that is credibly sourced may be considered. That said, it will be important to consider the proper weight to give such information when factoring in other internal, nonpublic material. A more holistic set of data points, properly weighted to individual facts and cir-
cumstances, will better position me to make independent and objective decisions on the subject.

**Q.10. Operational Risk**—Based on your experience in financial services, what are some of the key operational risks that might be borne by FHFA’s regulated entities?

**A.10.** I have not concluded the regulated entities possess any particular operational risks because I lack specific insider knowledge of the regulated entities. More generally, however, my experience suggests that similar sized companies face the risk of a major cyber or data security event as a key operational risk. A significant cyberevent may be caused by hostile foreign actors seeking to degrade or debilitate a key economic driver of stability in the United States, external organized fraudsters, or some other combination of malevolent actors. Additional key operational risks found in larger companies may include a heavy reliance on third parties, ill-tuned models, ineffective controls, and an array of risks posed by human capital who are either poorly equipped to handle rapid technological advances or who overly rely on technology to manage risk. Lastly, whether considered a subset of operational risk or not, resiliency (risk) must also be considered.

**Q.11.** Fannie Mae and Freddie Mac (each a “GSE”) each rely on a common securitization platform to perform bond administration and other securitization functions. Will you commit to conduct an audit or other investigation of each GSE’s management of the third-party risk and other operational risks posed by the relationship of a common securitization platform?

**A.11.** If confirmed, I will ensure the risks associated with the common securitization platform (CSP) will be considered as standalone CSP reporting or factored into broader topical-based reporting (e.g., reporting and analysis of operational and third-party risks).

**Q.12.** *Ongoing Conservatorships*—Will you commit to conduct an audit or other investigation of whether the ongoing conservatorships might pose risk to the ability of FHFA to effectively perform its regulatory functions and ensure the safety and soundness of each GSE?

**A.12.** Ensuring the safety and soundness of each GSE is vital to the stability and liquidity of the mortgage market. As part of OIG’s robust oversight of FHFA’s regulatory and conservator responsibilities, if confirmed, OIG will use a risk-based oversight strategy to conduct its work (utilizing the approach detailed in questions 7, 8, and 9). If confirmed, I look forward to reporting on the effectiveness of FHFA’s regulatory functions as informed by its other responsibilities, including potential risks posed by current conservatorship activities. Whenever the conservatorship ends, FHFA must be exceptionally well-positioned to act as strongly as other independent federal financial regulators.

**Q.13.** In particular, will you commit to conduct an audit or other investigation of whether FHFA personnel with overlapping conservatorship and safety and soundness responsibilities might face conflicts of interest or other similar impediments that undermine their ability to perform their safety and soundness responsibilities?
A.13. If confirmed, I will seek to better understand whether and to what extent there is overlap with conservator and regulator FHFA personnel. To the extent FHFA OIG becomes aware of a credible conflict of interest allegation, OIG will take appropriate action to investigate the matter. To be sure, I commit to ensuring that key matters undermining or otherwise presenting an impediment from FHFA achieving its goal of becoming a world-class regulator will be a part of OIG's work.

Q.14. Will you commit to conduct an audit or other investigation of whether FHFA inappropriately consults with, or otherwise relies upon, the GSEs in connection with its rulemaking activities?

A.14. If confirmed, part of my work will be to determine whether FHFA inappropriately consults with anyone, including the GSEs, in connection with its rulemaking activities. Although consultation in and of itself may not be inappropriate, particularly in its role as the Enterprise's conservator, a proper balance must be maintained. To the extent FHFA OIG becomes aware of an allegation of inappropriate communications during the rulemaking process, OIG will take the necessary steps to fully assess the matter.

Q.15. OIG Staffing—Will you commit to assess the size and scope of the staffing and budget of the OIG, including benchmarks against the budgets and staffing of other Offices of Inspector General?

A.15. If confirmed, I commit to assessing the size and scope of the staffing and budget of FHFA OIG. As part of this assessment, I will benchmark the OIG against other offices while remaining mindful of the unique nature of FHFA's dual role as regulator and long-term conservator. I also commit to regular assessments of staffing and budget to adjust for any changes in the landscape of FHFA operational requirements. Being a good steward of allocated monies while being rightsized is fundamental to being well managed.

Q.16. Answering Questions for the Record—Please describe with particularity the process by which you answered these questions for the record, including identifying who assisted you in answering these questions along with a brief description of their assistance.

A.16. The sum and substance of these answers are mine and mine alone. They are based on my professional experience, a review of limited public reporting, and a commitment to fulfilling the mission of FHFA OIG. FHFA OIG's Director of External Affairs and Risk Analysis assisted me with formatting, helping maintain a consistent tone, and ensuring grammatical accuracy to these questions.