



OFFICE OF INSPECTOR GENERAL

U.S. Agency for International Development

MEMORANDUM

DATE: December 15, 2025

TO: Ambassador Jeff Bartos, U.S. Representative for U.N. Management and Reform

FROM: Adam Kaplan, Associate Deputy Inspector General (A), and Sean Bottary, Assistant Inspector General for Investigations (A)

SUBJECT: Identified Deficiencies in the United Nations (UN) Office of Internal Oversight Services (OIOS) Investigation Report on Misconduct by Staff Members at the United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA)

Summary

The USAID Office of Inspector General (OIG), a law enforcement agency separate and distinct from USAID, is statutorily mandated to provide independent oversight of agencies performing foreign assistance programs. We do not set policy or award funds, but our independent oversight work is designed to inform those who do. Oversight of aid to Gaza has been [top priority](#) since the influx of humanitarian assistance following Hamas' October 7, 2023, terrorist attacks in Israel.

In August 2024, OIOS completed its investigation into UNRWA following allegations that several staff members of UNRWA took part in the October 7 attacks. OIOS investigators made findings in relation to 19 UNRWA staff alleged to have been involved in the attacks. The report found that in nine cases, the evidence obtained by OIOS was insufficient to support the staff members' involvement, and in one case, no evidence was obtained by OIOS to support the allegations of the staff member's involvement. In the nine other cases, OIOS determined that the evidence indicated that the staff members may have been involved in the attacks.

USAID OIG requested to review an unredacted version of the investigation. OIOS initially refused to provide an unredacted report in October 2024, allowing us access to only the redacted report, which was useless for our investigative purposes. USAID OIG was subsequently able to obtain independent information that furthered our [ongoing investigation](#) into UNRWA staff associated with Hamas through other sources, methods, and diplomatic channels. This fall, we were able to obtain a copy of the unredacted report from OIOS. Having reviewed the unredacted report, we offer here a brief review of some of the report's major



OFFICE OF INSPECTOR GENERAL

U.S. Agency for International Development

deficiencies, validating our decision to conduct our own independent investigation. We additionally offer one related observation on the risk of terminated UNRWA staff with suspected ties to the October 7 attacks circulating to other U.S.-funded aid organizations.

Independent Authentication of Materials

One of the primary concerns OIOS raised in their report is that they were “unable to independently authenticate” the evidence presented by the Israeli government. This is a problematic statement for two primary reasons. First, the physical material presented by the Israeli government would be considered “collected enemy materials,” given that they were obtained from Hamas, a designated foreign terrorist organization in the United States and other countries. It is thus unreasonable to believe that anyone could independently authenticate the materials. Second, OIOS presented no evidence to suggest that the materials were not authentic. Rather, they rely on the argument that they were only provided with copies, while the originals remained under the custody of Israeli officials. USAID OIG has found no evidence to suggest that the authenticity of the materials collected by the Israeli government should be questioned. OIOS maintains that their inability to independently corroborate or authenticate is a concern with the UN’s “clear and convincing standard” for misconduct.

Limited Scope and Focus

The OIOS investigation was limited to "claims of the possible involvement of the...UNRWA staff members in the armed attacks of 7 October 2023 in Southern Israel." The investigation did not review whether the UNRWA staff members were current or former members of Hamas. Rather, the report clearly stated that OIOS "has not drawn conclusions regarding their alleged membership of the military wing of Hamas or other militant groups." Notably, during the OIOS investigation, UNRWA issued a directive change on Outside and Political Activities (dated June 10, 2024), which prohibited staff from "participating in the activities of or being a member of any militant or armed group or entity." This could have given OIOS the latitude to expand their scope, but they chose not to do so. USAID OIG considered both as part of its independent investigation.

Investigative Details- Information Technology

As part of their investigation, OIOS stated they reviewed "information and communications technology" data. According to the report, they found “no significant activity or items of



OFFICE OF INSPECTOR GENERAL

U.S. Agency for International Development

interest in the various email archives” of the subjects of the report. However, OIOS does not provide any details regarding the methodology behind their review. For example, they do not share what key words were used as part of their search of UNRWA staff email archives. Additionally, there is no indication from the information provided in the report that OIOS conducted any sort of review of information available outside of the email archives or what was provided to OIOS by the State of Israel.

Additional Observation

USAID OIG notes with concern the way certain UNRWA employees involved in the report were terminated from their employment. In January 2024, the State of Israel provided Philippe Lazzarini, Commissioner-General of UNRWA, a list of 12 UNRWA employees suspected of taking part in the October 7, 2023, attacks. UNRWA confirmed their employment and terminated those individuals "to protect the Agency's ability to deliver humanitarian assistance." The characterization of their termination allows these individuals to seek further employment with other NGOs or UN organizations who may potentially receive U.S. taxpayer funding for foreign assistance in Gaza. Absent robust vetting protocols, the likelihood for recirculation of these individuals into the aid sector is very high. For this reason, in November USAID OIG launched [Operation Stop the Carousel](#), a proactive investigation designed to prevent the circulation of terrorists across international aid organizations receiving U.S. funding in Gaza, including UN and non-government organizations. This Operation will greatly expand OIG's existing investigation into Hamas-linked staff affiliated with UNRWA, which has already referred 17 individuals believed to have supported and/or participated in the October 7, 2023, terrorist attacks for suspension/debarment consideration by the Department of State. The goal of this investigation will be to prompt administrative action to prevent the recirculation and rehiring of Hamas members throughout the aid sector.