



NATIONAL SCIENCE FOUNDATION  
OFFICE OF INSPECTOR GENERAL  
OFFICE OF INVESTIGATIONS

**CLOSEOUT MEMORANDUM**

**Exhibit  
12**

Witness: E. Fred Schubert, Ph.D.

10/10/2025

Michelle Keegan, RMR, CRR, CSR

Case Number: I09020004

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OIG opened this investigation based on an allegation that a Principal Investigator (PI)<sup>1</sup> on an NSF award<sup>2</sup> had not disclosed to the awardee institution<sup>3</sup> his interest in a small business he had founded with his wife.<sup>4</sup> It was also alleged that the PI's company had misused funds received under a Small Business Innovation Research award from NSF. We requested records from the awardee institution and the small business. Review of those records disclosed that (1) the awardee institution was aware of the PI's interest in the small business and acted to mitigate any conflict of interests; and (2) there was no evidence indicating that NSF award funds were misused or misappropriated.

During the course of this investigation, OIG received numerous complaints by the PI and his wife<sup>5</sup> alleging misconduct by employees of the awardee institution and NSF officials. The allegations involved project management decisions that were not within the purview of OIG. OIG had attempted to meet with the PI and his wife regarding their concerns and allegations but they declined to do so.

This investigation is **closed**.

[REDACTED]