

April 13, 2026

Senator Charles E. Grassley  
Chairman - Committee on the Judiciary  
Washington, DC 20510

The FBI's use of "Prohibited Access" designations within its Sentinel case management system should be understood in the proper operational and legal context. I am familiar with this designation, although I did not personally administer such files during my career, as they are typically reserved for the most sensitive categories of investigations—Foreign Counterintelligence, Public Corruption, Sensitive Investigative Matters, and internal investigations, and the focus of my career was on counterterrorism.

The purpose of this designation is straightforward: to restrict access to individuals who do not have a demonstrated need to know or who lack the appropriate security clearance, and to prevent the intentional or accidental disclosure of a "Sensitive Investigative Matter" (SIM). This is not a novel or unique practice. It reflects a long-standing principle across law enforcement and intelligence agencies, where compartmentation is essential to protecting sources and methods, preserving the integrity of investigations, and ensuring operational security.

From my experience, the use of restricted access controls is not inherently concerning; rather, it is a necessary safeguard. Sensitive investigations often involve classified information, confidential human sources, or legally protected material. Limiting access to a defined group of cleared and assigned personnel reduces the risk of compromise, whether intentional or inadvertent. It also ensures that investigative activities remain focused and controlled, particularly in cases that may have national security implications or involve public officials.

Assertions that the "Prohibited Access" designation serves as a mechanism to conceal improper, unauthorized, or politically motivated investigations are inconsistent with how the FBI operates in practice. Restricting access within Sentinel does not equate to the absence of oversight. On the contrary, such cases are typically subject to heightened scrutiny. While access may be limited within the case management system, the existence and substance of these investigations are known to, and reviewed by, multiple layers of leadership and oversight entities.

In my experience, a sensitive investigation designated as "Prohibited Access" or "Restricted" would be well known to the assigned investigative team,

supervisory personnel, FBI legal counsel, and senior leadership within the relevant field office—such as the Washington Field Office—as well as at FBI Headquarters. In addition, coordination with the United States Attorney’s Office and the Department of Justice at Main Justice ensures that prosecutorial and legal oversight is applied throughout the life of the case. These layers of review are designed specifically to ensure that investigative decisions are lawful, properly predicated, and consistent with Department of Justice guidelines.

Equally important, the designation does not provide a mechanism to circumvent discovery obligations in criminal proceedings. The FBI operates within a legal framework that requires disclosure of exculpatory and relevant information under established rules and case law. Decisions regarding discovery are not controlled by case file access settings in Sentinel, but by legal standards enforced through prosecutors and, ultimately, the courts. The notion that a technical access control could be used to evade such obligations does not align with established legal processes or with the institutional safeguards in place.

More broadly, the use of compartmented access reflects the FBI’s commitment to disciplined investigative practices. The Bureau’s work is grounded in predication, guided by law, and reinforced by a culture that emphasizes integrity and professionalism. During my tenure, I did not observe investigations being initiated or conducted for political purposes, nor did I encounter the use of internal systems or processes to mask improper activity. The FBI I served in maintained clear expectations that investigations be conducted without political influence and in accordance with the highest standards of accountability.

In sum, the “Prohibited Access” or “Restricted File” designation within Sentinel is a standard and necessary tool used to protect sensitive investigations. It does not operate in isolation, nor does it shield cases from oversight or legal accountability. Properly understood, it is part of a broader framework designed to ensure that the FBI conducts its investigations with integrity, within the bounds of the law, and with the level of supervision and review appropriate to matters of significant sensitivity.

Christopher O’Leary  
Former Special Agent  
Federal Bureau of Investigation

