

Special Inspector General for



Afghanistan Reconstruction

FORENSIC AUDIT

FINAL REPORT:

SEVENTEEN YEARS OF RECONSTRUCTION OVERSIGHT

December 2025

Cover photo: Afghan Muslim men walk at sunset at the courtyard of the Jami mosque during the Islamic holy month of Ramadan in Herat. (AFP photo by Hoshang Hashimi)



Special Inspector General
for Afghanistan Reconstruction

From 2002 through mid-2021, the United States Congress appropriated approximately \$144.7 billion for Afghanistan reconstruction—far more than it spent on the post World-War-II Marshall Plan in inflation adjusted terms. The mission promised to bring stability and democracy to Afghanistan, yet ultimately delivered neither.

The Afghan government’s stunningly rapid collapse in August 2021 laid bare a fragility concealed by years of confident assertions of progress. The gap between ambition and reality was vast, with deteriorating conditions continually stymying objectives that proved to be unrealistic.

Multiple factors contributed to the failure of the U.S. effort to transform a war-torn, underdeveloped country into a stable and prosperous democracy. For example, early and ongoing U.S. decisions to ally with corrupt, human-rights-abusing powerbrokers bolstered the insurgency and undermined the mission, including U.S. goals for bringing democracy and good governance to Afghanistan. Efforts to improve Afghanistan’s economic and social conditions also failed to have a lasting impact. And, despite nearly \$90 billion in U.S. appropriations for security-sector assistance, Afghan security forces ultimately collapsed quickly without a sustained U.S. military presence.

Costs were immense. Tens of thousands of people—including more than 2,450 U.S. servicemembers—were killed. Many more were injured, among them more than 20,700 U.S. servicemembers.

SIGAR will close its doors on January 31, 2026, pursuant to Section 7809 of the National Defense Authorization Act (NDAA) for Fiscal Year 2025. Before then, SIGAR’s authorizing statute requires us to prepare “a final forensic audit report on programs and operations funded with amounts appropriated or otherwise made available for the reconstruction of Afghanistan.”¹

This report both fulfills that requirement and summarizes, for the first time in one report, the totality of SIGAR’s work overseeing the U.S. reconstruction effort in Afghanistan. Our summary includes the results of SIGAR’s performance and financial audits, criminal investigations, inspections, and quarterly and lessons-learned reports. Taken together, SIGAR’s work highlights serious systemic issues with reconstruction and paints a picture of a two-decade long effort fraught with waste.

Importantly, this report also contains SIGAR’s final thoughts and observations about the United States’ 20-year mission to build a stable, democratic Afghanistan, including an examination of the factors that contributed to its failure. As part of that analysis, SIGAR interviewed multiple key former decision makers who willingly shared with us their unvarnished assessments.

Congress established SIGAR in 2008 to “promote economy, efficiency, and effectiveness” and “prevent and detect waste, fraud, and abuse.”² From 2009 to September 2025, we issued nearly 900 performance and financial audits, evaluations, inspections, alert letters, lessons-learned and quarterly reports, and other oversight products, and made nearly 1,500 recommendations to recover funds, improve agency oversight, and increase program effectiveness. Audit, inspection, and evaluation reports generated more than \$2.51 billion in cost savings to the U.S. taxpayer. For example, our financial audits identified more than \$541 million in questioned costs. SIGAR investigations resulted in 171 criminal convictions, including convictions in one of the largest tax evasion and tax-crime conspiracy cases in history. Criminal fines, restitutions, forfeitures, civil settlements, and U.S. government cost savings and recoveries totaled approximately \$1.7 billion. Overall, SIGAR identified at least 1,327 instances of waste, fraud, and abuse; at least \$26 billion in wasted funds; and more than \$4.6 billion in potential savings to the U.S. taxpayer.

As we prepare to close, I want to express my gratitude to Congress and the American taxpayer for their trust in SIGAR and support for its mission. I thank the various executive branch agencies that responded to our requests for information despite their many other responsibilities. I am especially grateful to the U.S. military and other security professionals for routinely escorting SIGAR staff to remote and dangerous parts of Afghanistan. Without their protection, it would not have been possible to carry out our mission.

I also want to express my deep appreciation to every current and former member of SIGAR’s staff, many of whom served in or traveled to Afghanistan during that active conflict. I encourage you to explore some of their final thoughts, as recorded in interviews conducted for [SIGAR’s “Oral History Project.”](#)

Our hope is that the insights and lessons found in SIGAR’s work will inform future reconstruction efforts of similar scale and complexity. We owe that to all who served and especially to those who paid the ultimate price.


Gene Aloise

Acting Inspector General for Afghanistan Reconstruction

Arlington, Virginia

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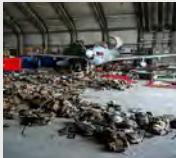
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EXECUTIVE SUMMARY

From 2002 through mid-2021, the United States appropriated approximately \$144.7 billion for Afghanistan reconstruction. Since its inception in 2009, SIGAR identified 1,327 instances of waste, fraud, and abuse totaling between \$26.0 billion and \$29.2 billion.³ Waste was the most prevalent issue identified, accounting for 93 percent of the total amount of waste, fraud, and abuse.

From 2009 through August 2025, SIGAR issued nearly 900 performance and financial audits, evaluations, inspections, alert letters, lessons-learned and quarterly reports, and other types of oversight products, and reported on 1,911 internal control weaknesses. SIGAR made almost 1,500 recommendations to recover funds, improve agency oversight, and increase program effectiveness.⁴ For example, internal control weaknesses resulted in the Department of Defense (DOD) overpaying more than \$500 million in salary payments from U.S. taxpayer funds to the Afghan government. As of June 30, 2025, U.S. agencies had implemented 1,085 recommendations, which lead to enhanced program outcomes, increased mission effectiveness, and the diversion of at-risk funds for better use. Audit, inspection, and evaluation reports generated more than \$2.5 billion in cost savings. For example, SIGAR's financial audits identified more than \$541 million in questioned costs. SIGAR also identified 1,327 instances of waste, fraud, and abuse totaling \$26.0 to \$29.2 billion.

Additionally, SIGAR special agents helped convict 171 criminals in the United States and Afghanistan, leading to \$1.7 billion in criminal fines, asset forfeitures, civil settlements, recoveries, and savings to the U.S. government. SIGAR agents also referred 1,076 individuals and entities for suspension and debarment. Importantly, lives may have been saved because of SIGAR's investigative work. For example, the discovery of defective culvert grates resulted in remediation efforts that prevented a repeat of what led to the death of two U.S. soldiers. Overall, SIGAR identified more than \$4.6 billion in savings to the U.S. taxpayer, including recovered monies, questioned costs, and canceled expenditures.

Despite Afghanistan falling to the Taliban in 2021, the United States continued to be the nation's largest donor, having disbursed more than \$3.83 billion in humanitarian and development assistance there since. In the March 2025 quarter alone, disbursements totaled \$120 million. SIGAR continued to oversee U.S. funds provided through public international organizations, such as the United Nations (UN) and World Bank, and issued 24 performance audits since August 2021. Over the past year, SIGAR issued several audits examining the Taliban's diversion of U.S. funds in response to a 2023 House Foreign Affairs Committee request. In March 2025, SIGAR reported that the Department of State (State) and the United States Agency for International Development (USAID) needed to strengthen agreements with public international organizations to ensure that U.S. funds are not diverted to terror groups. Although UN shipments of U.S. currency to Afghanistan had stabilized the Afghan economy,

SIGAR found that they also benefited the Taliban. SIGAR's audits contained significant recommendations to mitigate the risk that U.S. funds could be diverted to the Taliban.

SIGAR broke new ground by establishing a Lesson Learned Program (LLP) in 2016 which issued 16 reports identifying numerous lessons to be considered in contingency and reconstruction operations through a long-range, broader-scope, whole-of-government approach that influenced U.S. policy and legislation. In response to several congressional requests, LLP analysts also led SIGAR-wide evaluations on the factors leading to the collapse of the Afghan government and its security forces in 2021, and the challenges for oversight and accountability following the Taliban takeover.

SIGAR deployed auditors and investigators to Afghanistan, who worked under harsh and dangerous conditions. The Council of the Inspectors General on Integrity and Efficiency (CIGIE) recognized SIGAR's work with 34 awards, including four Sentner awards for dedication and courage (e.g., a SIGAR special agent who helped defend a consulate under fire), the Glenn/Roth award for improved legislation to protect Afghan children from assault, and 29 awards for excellence for audit, investigation, lessons-learned, high-risk, and quarterly reports.

Throughout its existence, SIGAR examined reconstruction efforts and programs and identified when U.S. agencies did not achieve their objectives or sufficiently address relevant risks. The cause of the failure is called an "internal control weakness." SIGAR's performance audits and evaluation reports identified 1,911 internal control weaknesses that contributed to or allowed for waste, potential fraud, and abuse. These weaknesses fell generally into six categories: planning/contracting, oversight/monitoring, capacity building, management, judicious spending of funds, and information quality and data reliability.

SIGAR's Audits and Inspections Directorate issued nearly 800 performance audit, evaluations, financial audits, alert letters, inspection reports, and other report types. It made nearly 1,500 recommendations to recover funds, improve agency oversight, and increase program effectiveness, saving the U.S. taxpayer \$2.5 billion. In addition, SIGAR's Investigations Directorate obtained 171 criminal convictions, 141 contractor suspensions, and 582 contractor debarments, with criminal fines, restitutions, forfeitures, and civil settlements resulting in cost savings and recoveries totaling \$1.7 billion. Overall, SIGAR's work to date has resulted in approximately \$4.6 billion in realized and potential U.S. taxpayer savings, including recovered monies, questioned costs, and canceled expenditures.

Following the September 11, 2001, attacks, the U.S. government focused on two key objectives in Afghanistan: disrupting and dismantling al-Qaeda and preventing the country from becoming a haven for terrorists.⁵ However, what began as a relatively contained security mission quickly expanded into a wide-ranging nation-building endeavor. Unlike past reconstruction efforts in places like post-World War II Europe or Japan where the United States sought to rebuild countries with modern economies, industry, and infrastructure that had been degraded by war, Afghanistan was a severely underdeveloped

state. As a result, “reconstruction” there often involved trying to create capabilities, systems, and institutions of a type and quality that Afghanistan had never possessed.

Using a series of lessons-learned reports on several reconstruction sectors, including assistance to Afghan security forces, private sector development, and anticorruption, SIGAR compared U.S. ambitions for Afghanistan with the poor intervention results. SIGAR’s reports revealed fundamental flaws in America’s two-decade long mission in Afghanistan. For example, the U.S. government:

- continuously struggled to develop a coherent strategy for what it hoped to achieve;
- created unrealistic timelines and expectations that prioritized spending quickly, which led to increased corruption and reduced program effectiveness;
- built institutions and created infrastructure that could not be sustained;
- rarely conducted sufficient monitoring and evaluation to understand the impact of its programs;
- failed to understand Afghanistan’s complex social, economic, and political dynamics, and tailor its efforts accordingly; and
- failed to appreciate the negative effect an ongoing war had on the chances that its reconstruction efforts would succeed.⁶

Additionally, several former senior U.S. government officials and other participants in, and observers of, the reconstruction effort, told SIGAR that the seeds of failure in Afghanistan had been sown long before the final withdrawal. More critically, many of them concluded that success—when measured against the ambitious goals set by the United States—may never have been achievable, regardless of the strategies adopted or the resources invested.

Before committing to future reconstruction efforts in other conflict-affected countries, officials and policymakers should understand the factors that contributed to failure in Afghanistan, evaluate the viability of success in similar environments, and determine whether such efforts are worth the sacrifices of blood and treasure they may require.

The outcome in Afghanistan should serve as a cautionary tale for policymakers contemplating similar reconstruction efforts. If there is one overarching lesson to be learned from a tragedy that unfolded over 20 years, it is that any U.S. mission similar in context, scale, and ambition must confront the real possibility of failure.

The U.S. experience in Afghanistan demonstrates the need for sober assessments of what is achievable and what may be beyond the reach of an external intervention. Moreover, those tasked with deriving lessons from such endeavors should be wary of assuming that improvements in technique or tweaks in strategy can compensate for fundamental flaws in a mission’s premise. Without a realistic understanding of, and respect for, the constraints inherent in these situations, attempts to “fix” or refine the approach risk repeating the same mistakes while expecting different outcomes.



CHAPTER 1

INTRODUCTION

This final report from the U.S. Special Inspector General for Afghanistan Reconstruction (SIGAR) has two purposes. The first is to fulfill the requirement in its authorizing statute to prepare, prior to closing, “a final forensic audit report on programs and operations funded with amounts appropriated or otherwise made available for the reconstruction of Afghanistan.”⁷ The second is to provide SIGAR’s final thoughts and observations on the 20-year effort to build a stable, democratic Afghanistan, including an examination of the factors that contributed to its failure.

Since 2001, the United States has been the largest donor to the Afghan people. Following the terrorist attacks of September 11, 2001, until the withdrawal of U.S. forces from Afghanistan in August 2021, the United States appropriated over \$144.7 billion for the reconstruction of Afghanistan. An additional \$763 billion was spent on warfighting. Since August 2021, the United States has appropriated approximately \$3.47 billion for assistance to Afghanistan, largely for humanitarian and development aid. In addition, on February 11, 2022, President Biden issued an executive order freezing and consolidating \$7.0 billion of Afghan government assets in U.S. banks and using \$3.5 billion of that for assistance to the Afghan people through the creation of the Swiss-based Fund for the Afghan People, or Afghan Fund.

Congress created SIGAR in 2008 to provide independent oversight of the U.S. reconstruction effort in Afghanistan.⁸ SIGAR’s enabling legislation required the agency to:

- conduct and supervise audits and investigations related to programs and operations

An Afghan shepherd walks with his flock of sheep along a road in Kandahar on July 29, 2025.
(AFP photo by Sanaullah Seiam)

funded with U.S. money appropriated or otherwise made available for the reconstruction of Afghanistan;

- make recommendations to promote economy, efficiency, and effectiveness of reconstruction programs and operations, and to prevent and detect waste, fraud, and abuse in those programs and operations;
- keep the Congress and the Secretaries of State and Defense fully informed about problems and deficiencies related to activities and oversight of the administration of Afghanistan reconstruction; and
- submit a quarterly report to Congress summarizing for the period of that quarter the activities under programs and operations funded with money appropriated or otherwise made available for the reconstruction of Afghanistan.

Reconstruction, as described in SIGAR's enabling statute, includes any major contract, grant, agreement, or other funding mechanism entered into by any department or agency of the U.S. government that involves the use of amounts appropriated or otherwise made available to any public or private sector entity to (1) build or rebuild physical infrastructure in Afghanistan, (2) establish or reestablish governmental or societal institutions of Afghanistan, or (3) provide products or services to the people of Afghanistan. In short, reconstruction includes any expenditure of U.S. funds for humanitarian, development, and any other assistance to Afghanistan.⁹ SIGAR also had the duties, responsibilities, and authorities of inspectors general under the Inspector General Act of 1978, as amended.¹⁰

SIGAR'S UNIQUE MANDATE AND PRODUCTS

SIGAR was the only office of inspector general focused solely on the Afghanistan reconstruction mission. Unlike other inspectors general, SIGAR was not part of another department or agency, but was independent. No agency head was authorized to cancel any SIGAR audit or investigation. SIGAR was also unique in its authority to look across departmental boundaries and assess reconstruction programs and projects funded by the Department of Defense (DOD), Department of State (State), the United States Agency for International Development (USAID), and all other U.S. agencies involved in Afghanistan. This broad authority enabled SIGAR to take a whole-of-government approach to its oversight work.

SIGAR created unique products that covered the full spectrum of Afghanistan reconstruction spending and activities. SIGAR's *Quarterly Report to the United States Congress* was the single most comprehensive and detailed source of information about Afghanistan reconstruction, and related oversight issues. It became the "go-to" source for information on Afghanistan assistance both here in the United States and around the world, including in Afghanistan and by the United States' coalition allies.

SIGAR was unique among inspector general offices in establishing a Lessons Learned Program that produced a series of reports on whole reconstruction sectors (such as security force assistance and economic development) or high-profile issues (such



SIGAR's director of research and analysis, Deborah Scroggins, interviews President Ashraf Ghani at the presidential palace in Kabul, September 2015. (SIGAR photo by Steven Mocsary)

as donor coordination and monitoring and evaluation). These reports built on the project- and program-level findings from SIGAR's audit work but took a broader view to evaluate the outcome of U.S. reconstruction efforts, identify sector-wide challenges, and determine best practices. These reports also synthesized the work done by other U.S. government and oversight agencies, academic institutions, think tanks, and independent scholars. Most importantly, SIGAR's lessons learned reports incorporated original research, including information obtained in interviews with key U.S. and NATO military and civilian officials, contractors, nongovernmental organizations (NGOs), and former Afghan government officials and civilians.

SIGAR also issued five High-Risk Lists—one at the start of each Congress since 2014—to call attention to areas of the U.S.-funded reconstruction effort that were especially vulnerable to significant waste, fraud, and abuse. Finally, SIGAR testified before Congress 24 times.



CHAPTER 2

THE UNITED STATES APPROPRIATED \$148.2 BILLION FOR AFGHANISTAN RECONSTRUCTION

From 2002 through June 30, 2025, the United States appropriated \$148.2 billion for Afghanistan reconstruction.¹¹ As of June 30, 2025, the United States obligated more than \$138.0 billion and disbursed \$137.3 billion of the appropriated funding. Appropriations funded security (60 percent), development (24 percent), humanitarian (5 percent), and agency operations (11 percent) accounts.¹² Assistance peaked in fiscal years 2009 to 2012 (\$10.4 billion, \$16.6 billion, \$16.3 billion, and \$14.8 billion, respectively), corresponding with surges in U.S. troops and civilian personnel, and accounted for nearly 40 percent of total reconstruction funding. In this peak four-year period, 62 percent of appropriations were directed to security and 28 percent to development accounts.

By the end of 2014, the United States had already committed more funds to reconstruct Afghanistan, in inflation-adjusted terms, than it spent to reconstruct 16 European nations after World War II under the Marshall Plan.¹³ At the time SIGAR made this calculation, the U.S. Congress had appropriated \$104 billion for the reconstruction of Afghanistan.¹⁴ By the time the United States ceased all assistance in Afghanistan in 2025, Congress had appropriated another \$44 billion, or 42 percent more.¹⁵

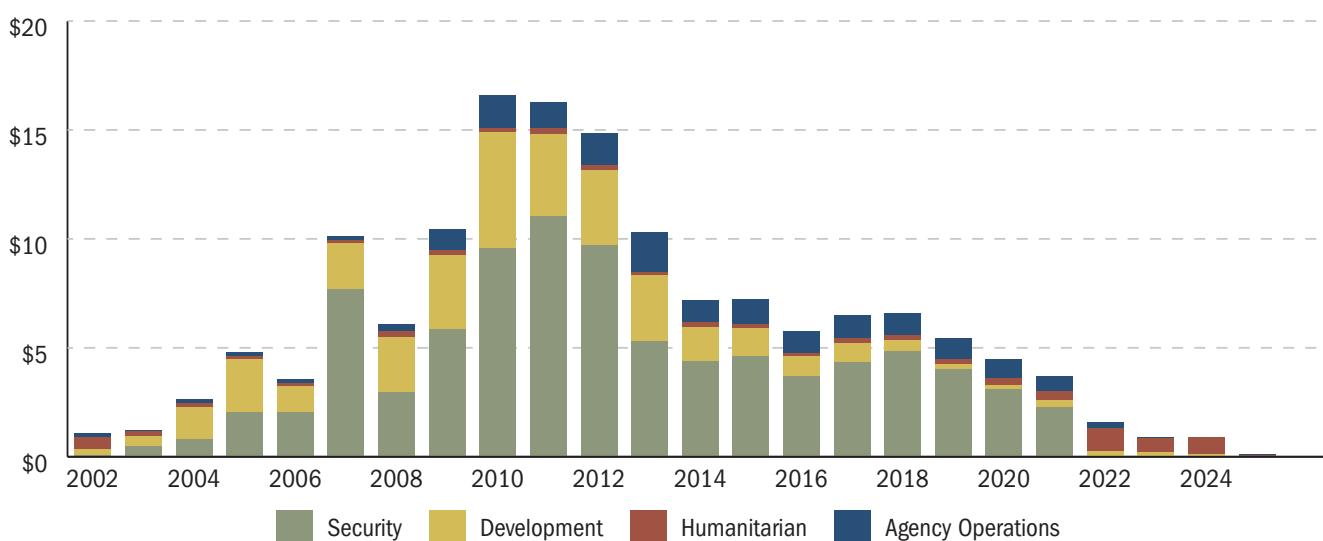
U.S. assistance to Afghanistan continued after the U.S. withdrawal in August 2021, albeit at decreased levels. From October 1, 2021, to June 30, 2025, the United States appropriated nearly \$3.5 billion for Afghanistan, with more than 72 percent earmarked

Afghan children attend a class at an open air school in the Zhari District of Kandahar Province on May 26, 2025. (AFP photo by Sanaullah Seiam)

for humanitarian assistance. In addition to these appropriations, the United States allocated another \$14.2 billion for Afghan refugees to be resettled in the United States, and transferred \$3.5 billion in frozen Afghan central bank assets to the Afghan Fund.¹⁶ Following a review of U.S.-funded foreign assistance programs in the first quarter of fiscal year (FY) 2025, the United States terminated all foreign assistance awards in Afghanistan. As of June 30, 2025, State continued to fund three legacy awards outside of Afghanistan. Figure 1 depicts appropriations for Afghanistan reconstruction by assistance account categories over time.

FIGURE 1

U.S. RECONSTRUCTION APPROPRIATIONS FROM FY 2002 TO JUNE 30, 2025 (\$ BILLIONS)



Source: SIGAR analysis.

Appropriated Funds:

Funding made available for specific purposes. Appropriations for Afghanistan reconstruction were made available to 44 funding accounts across multiple U.S. government agencies.

Obligated Funds: Funds committed for specific purposes. In Afghanistan, reconstruction funds were obligated across 14 reconstruction sectors.

The next two sections discuss in more detail the funds that were **appropriated** and **obligated** for Afghanistan reconstruction. Appropriations provide the legal authority that allow agencies to obligate funds for specific programs or purposes. Obligations are the specific commitments agencies make that draw down that authority. Unless funds are appropriated, agencies cannot obligate or disburse funds. In the case of Afghanistan reconstruction, appropriations were made available to 44 funding accounts across multiple U.S. government agencies, including DOD, State, and USAID. SIGAR grouped these accounts into four categories: security, development and governance, humanitarian assistance, and agency operations. Appropriated funds were then obligated across 14 reconstruction sectors. Appropriations are discussed on pages 7–11, and obligations are discussed on pages 11–13.

THE SIX LARGEST U.S. ASSISTANCE ACCOUNTS COMPRISED \$117.2 BILLION, 79 PERCENT OF TOTAL CUMULATIVE APPROPRIATIONS FOR AFGHANISTAN RECONSTRUCTION

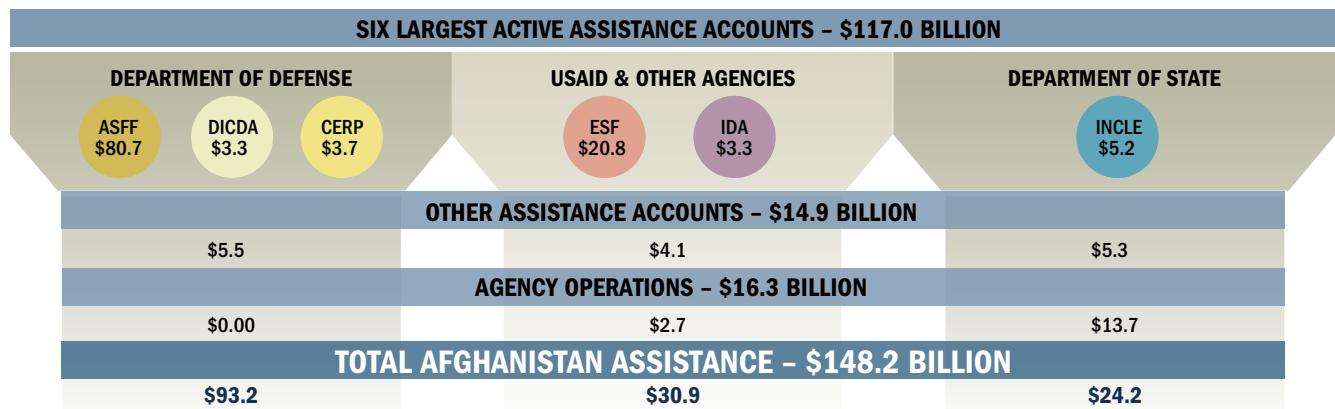
As of June 30, 2025, the United States government appropriated or otherwise made available \$148.2 billion in funds for reconstruction and related activities since FY 2002. Total Afghanistan reconstruction appropriations were allocated as follows:

- \$88.8 billion for security (including \$4.6 billion for counternarcotics initiatives).
- \$35.9 billion for governance and development (including \$4.6 billion for counternarcotics initiatives).
- \$7.1 billion for humanitarian aid.
- \$16.3 billion for agency operations (including \$209.4 million for counternarcotics initiatives).

As shown in Figure 2, the six largest assistance accounts comprised \$117.0 billion, nearly 79 percent of total cumulative appropriations. An additional \$14.9 billion, more than 10 percent of total cumulative appropriations, was made available to another 31 assistance accounts to cover a range of programming purposes.

FIGURE 2

U.S. APPROPRIATIONS SUPPORTING AFGHANISTAN ASSISTANCE, FY 2002 TO JUNE 30, 2025 (\$ BILLIONS)



Note: Numbers have been rounded.

Source: SIGAR, *Quarterly Report to the United States Congress*, SIGAR-2021-QR-4, October 30, 2021, pp. 42–65; SIGAR, *Quarterly Report to the United States Congress*, SIGAR-2025-QR-3, July 30, 2025, pp. 70–88.

Security Funding Accounted for 60 Percent of Total Appropriations

Afghanistan Security Forces Fund (ASFF)

Congress appropriated nearly \$80.7 billion to the Afghan Security Forces Fund (ASFF), which comprised nearly 91 percent of all security-related reconstruction appropriations. Congress established ASFF in 2005 to provide the Afghan National Defense and Security Forces (ANDSF) with equipment, supplies, services, training, and funding for salaries,

as well as facility and infrastructure repair, renovation, and construction. ANDSF components included the Afghan Air Force (AAF), Afghan National Army (ANA), Afghan National Police (ANP), and the Afghan Special Security Forces (ASSF). ASFF appropriations allocated to each of these organizations supported sustainment, infrastructure, equipment and transportation, and training and operations. DOD ceased support of the ANDSF and began closing ASFF contracts following the Taliban takeover in August 2021.¹⁷

Drug Interdiction and Counter-Drug Activities (DICDA)

Congress appropriated \$3.3 billion to Drug Interdiction and Counter-Drug Activities (DICDA) to bolster stabilization efforts in Afghanistan by combating the drug trade and related activities. DICDA supported Afghan Counternarcotics Police Units (mentored by the U.S. Drug Enforcement Administration (DEA) and U.S. Army Special Forces), which were responsible for investigating high-value targets and conducting drug-interdiction operations. Afghanistan's Special Mission Wing (SMW) also received DICDA funding to support its fleet of rotary- and fixed-wing aircraft, to conduct intelligence, surveillance, and reconnaissance operations supporting in-country counterdrug activity.¹⁸

Other Security Funding

As shown in Table 1, the remaining \$4.9 billion in security-sector funding was appropriated to the following accounts: Military Base and Equipment Transfers, Foreign Military Financing (FMF), Afghanistan Freedom Support Act (AFSA), Train and Equip (T&E), NATO Resolute Support Mission (RSM), Voluntary Peacekeeping (PKO), and International Military Education and Training (IMET).

TABLE 1

U.S. APPROPRIATIONS FOR SECURITY ASSISTANCE, FY 2002 TO JUNE 30, 2005 (\$ BILLIONS)			
Account	Agency	Total	Percent of Total
Afghanistan Security Forces Fund (ASFF)	DOD	\$80.7	91%
Drug Interdiction and Counter-Drug Activities (DICDA)	DOD	3.3	4%
Military Base and Equipment Transfers (FERP, FEPP, EDA & ACSA)*	DOD	2.3	3%
Foreign Military Financing (FMF)	State	1.1	1%
Afghanistan Freedom Support Act (AFSA)	DOD	0.6	1%
Train and Equip (T&E)	DOD	0.4	<1%
NATO Resolute Support Mission (RSM)	DOD	0.4	<1%
Voluntary Peacekeeping (PKO)	State	0.1	<1%
International Military Education and Training (IMET)	State	0.0	<1%
TOTAL – SECURITY ASSISTANCE APPROPRIATIONS		\$88.8	

*Military Base and Equipment Transfers include appropriations from the following: Foreign Excess Real Property (FERP); Foreign Excess Personal Property (FEPP); Excess Defense Articles (EDA); Acquisition and Cross-Servicing Agreements (ACSA).

Source: SIGAR, *Quarterly Report to the United States Congress*, SIGAR-2025-QR-3, July 30, 2025, p. 85.

Development Funding Accounted for 24 Percent of Total Appropriations

As of June 30, 2025, the U.S. government appropriated approximately \$35.9 billion to support governance, economic and social development in Afghanistan. Of this funding, 83 percent flowed through three accounts: the Economic Support Fund (ESF), the International Narcotics Control and Law Enforcement (INCLE) account, and the Commander's Emergency Response Program (CERP). Total development funding is depicted in Table 2 below.

TABLE 2

U.S. APPROPRIATIONS FOR DEVELOPMENT ASSISTANCE, FY 2002 TO JUNE 30, 2005 (\$ BILLIONS)			
Account	Agency	Total	Percent of Total
Economic Support Fund (ESF)	USAID	\$20.8	58%
International Narcotics Control and Law Enforcement (INCLE)	State	5.2	14%
Commander's Emergency Response Program (CERP)	DOD	3.7	10%
Afghanistan Infrastructure Fund (AIF)	DOD	1.0	3%
Non-Proliferation, Antiterrorism, Demining & Related Programs (NADR)	State	1.0	3%
Development Assistance (DA)	USAID	0.9	3%
Task Force for Business and Stability Operations (TFBSO)	DOD	0.8	2%
Global Health Programs (GHP)	USAID	0.6	2%
Contributions to International Organizations (CIO)	State	0.6	2%
U.S. Agency for Global Media (USAGM)	USAGM	0.4	1%
U.S. International Development Finance Corporation (DFC)	DFC	0.3	1%
Drug Enforcement Administration (DEA)	DOJ	0.3	1%
Educational and Cultural Exchange Programs (ECE)	State	0.1	<1%
USAID-Other (Other)	USAID	0.1	<1%
Commodity Credit Corp (CCC)	USAID	0.0	<1%
Human Rights and Democracy Fund (HRDF)	State	0.0	<1%
TOTAL - DEVELOPMENT ASSISTANCE APPROPRIATIONS		\$35.9	

Source: SIGAR, *Quarterly Report to the United States Congress*, SIGAR-2025-QR-3, July 30, 2025, p. 85.

Economic Support Fund (ESF)

The ESF account was managed by USAID. ESF programs were intended to advance U.S. interests by helping countries meet short- and long-term political, economic, development, and security needs. In Afghanistan, ESF provided humanitarian and non-humanitarian assistance. Humanitarian assistance included health, food security, education, and livelihoods programming. Nonhumanitarian assistance priorities included programs supporting counterterrorism, bolstering the economy, and helping Afghans navigate political and economic challenges through development, democracy, human rights, and governance programs.¹⁹ From FY 2002 through June 30, 2025, \$20.8 billion was appropriated to ESF, with \$265.5 million made available in the post-U.S. withdrawal period to assist vulnerable populations.²⁰

International Narcotics and Law Enforcement (INCLE)

The INCLE account, managed by State's Bureau of International Narcotics and Law Enforcement Affairs, received allocations of nearly \$5.2 billion from FY 2002 through June 30, 2025. INCLE funded projects and programs for advancing the rule of law and combating narcotics production and trafficking.²¹

Commander's Emergency Response Program (CERP)

DOD established the CERP account to help U.S. military commanders in Afghanistan respond to urgent, small-scale, humanitarian relief and reconstruction requirements in their areas of responsibility by supporting projects that would immediately assist the local population.²² In total, CERP received more than \$3.7 billion in appropriations from FY 2002 through June 30, 2025. CERP funds were intended to be restricted to projects under \$500,000, but many projects exceeded that limit.²³ More than 98 percent of CERP funds were appropriated prior to 2014. Notably, from FY 2008 and FY 2012, CERP appropriations averaged \$687.4 million per year.

Other Development Accounts

Other development accounts received \$6.2 billion in appropriations from FY 2002 through June 30, 2025, representing 17 percent of total development sector appropriations, as shown in Table 2 on page 9.

Humanitarian Funding Accounted for Five Percent of Total Appropriations

As of June 30, 2025, the U.S. government had provided approximately \$7.1 billion for humanitarian purposes in Afghanistan since 2002. Table 3 details humanitarian assistance appropriations across five funding accounts.

TABLE 3

U.S. APPROPRIATIONS FOR HUMANITARIAN ASSISTANCE, FY 2002 TO JUNE 30, 2005 (\$ BILLIONS)			
Account	Agency	Total	Percent of Total
International Disaster Assistance (IDA)	USAID	\$3.3	46%
Migration and Refugee Assistance (MRA and ERMA)	State	2.4	34%
Pub. L. No. 480 Title II	USAID	1.1	15%
USDA Programs (Title I, §416(b), FFP, FFE, ET, and PRTA)	USDA	0.3	4%
Transition Initiatives (TI)	USAID	0.0	1%
TOTAL – HUMANITARIAN ASSISTANCE APPROPRIATIONS			\$7.1

Source: SIGAR, *Quarterly Report to the United States Congress*, SIGAR-2025-QR-3, July 30, 2025, p. 85.

International Disaster Assistance (IDA)

IDA accounted for almost half of all humanitarian appropriations, totaling approximately \$3.3 billion from FY 2002 to June 30, 2025. Most of this funding, \$1.9 billion, was made available after the U.S. withdrawal in 2021.²⁴ USAID's Bureau for Humanitarian Assistance (BHA) administered IDA funds and was responsible for leading and coordinating the U.S. government's response to natural and human-induced disasters. Natural disasters include acts such as floods, drought, tsunami,

and earthquakes. Human-induced disasters include acts of violence, conflict, civil strife or explosions. BHA obligated funding for emergency food assistance projects when there was an identified need, and local authorities lacked the capacity to respond. BHA worked closely with international partners, such as the United Nations Children's Fund (UNICEF), the World Food Programme (WFP), and World Health Organization (WHO), to deliver goods and services to assist conflict and disaster-affected populations in Afghanistan. Since the U.S. withdrawal, 81 percent of IDA disbursements were directed to these and other UN partners.²⁵

Agency Operations Funding Accounted for Eleven Percent of Total Appropriations

As of June 30, 2025, the U.S. government had provided \$16.3 billion for agency operations in Afghanistan. Table 4 details agency operations across five funding accounts.

TABLE 4

U.S. APPROPRIATIONS FOR AGENCY OPERATIONS, FY 2002 TO JUNE 30, 2005 (\$ BILLIONS)			
Account	Agency	Total	Percent of Total
Diplomatic Programs, incl. Worldwide Security Protection (DP)	State	\$12.0	74%
USAID Operating Expenses (OE)	USAID	1.8	11%
Embassy Security, Construction, & Maint. (ESCM) - Capital Costs	State	1.5	9%
Oversight (SIGAR, State OIG, and USAID OIG)*	Multiple	0.8	5%
Embassy Security, Construction, & Maint. (ESCM) - Operations	State	0.2	1%
TOTAL - AGENCY OPERATIONS		\$16.3	

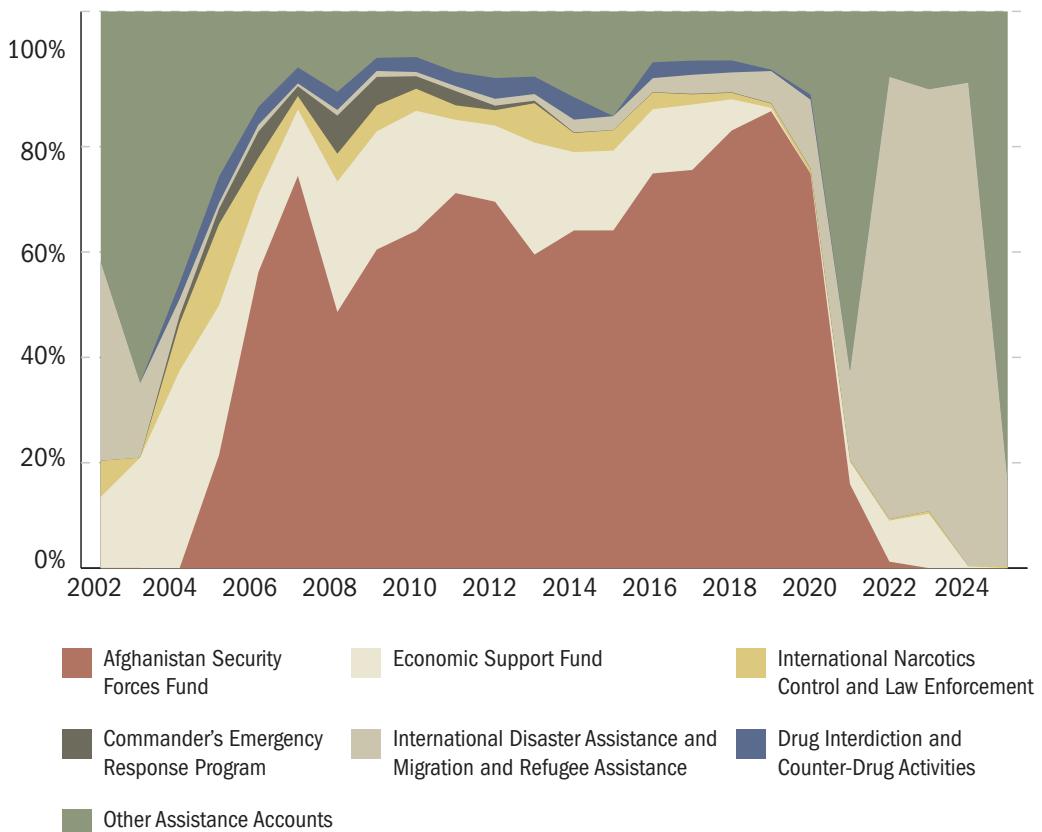
*Oversight numbers exclude DOD Office of Inspector General (OIG) amounts. Despite issuing 55 reports from 2009 to 2020 examining the DOD's support of the ANDSF, DOD OIG indicated that its office had "no operating expenses to support reconstruction efforts in Afghanistan," nor had DOD OIG conducted "activities under programs and operations funded with amounts appropriated or otherwise made available for the reconstruction of Afghanistan."

Source: SIGAR, *Quarterly Report to the United States Congress*, SIGAR-2023-QR-1, January 30, 2023, p. 46; SIGAR, *Quarterly Report to the United States Congress*, SIGAR-2025-QR-3, July 30, 2025, p. 85.

FUNDING OBLIGATIONS

From 2002 through June 30, 2025, U.S. agencies obligated more than \$138.0 billion of appropriated funds for Afghanistan reconstruction. Prior to the U.S. withdrawal from Afghanistan, the security funding accounts comprised 68 percent of total assistance obligations (excluding agency operations). At the end of FY 2021, ASFF was the only security assistance account that remained active for the sole purpose of closing out existing contracts. After the U.S. withdrawal from Afghanistan, programming funded through the two active humanitarian assistance accounts—USAID's International Disaster Assistance and State's Migration and Refugee Assistance—increased, accounting for 84 percent of the nearly \$2.9 billion in post-withdrawal assistance obligations (excluding agency operations). Figure 3 on the next page illustrates these shifts, depicting account obligations as a percent of total funding over time. For example, the dominance of ASFF and the Economic Support fund in the figure shows the U.S. commitment to the security and development sectors until just before the U.S. withdrawal in 2021.

FIGURE 3

ASSISTANCE ACCOUNT OBLIGATIONS AS A PERCENT OF TOTAL FUNDING,
FY 2002 TO JUNE 30, 2025

Note: Figure does not include obligations from the agency operation funds.

Source: SIGAR analysis.

Agencies obligated \$138.0 billion of appropriated funds across 14 sectors (including Agency Operations) for Afghanistan reconstruction.²⁶ The sectors, and their respective cumulative obligations appear in Figure 4 on the next page and Table 5 on page 15.

Security Funding Obligations

Security sector obligations were funded through ASFF, the Train and Equip Foreign Military Financing accounts, International Military Education and Training accounts, Afghanistan Freedom Support Act of 2002 allocations, NATO Resolute Support Mission contributions, and Military Base and Equipment Transfers funds, and were focused on developing and sustaining the ANDSF. Of the more than \$77.9 billion obligated, \$37.1 billion went toward sustainment (48 percent), \$11.5 billion (15 percent) to infrastructure, \$19.7 billion (25 percent) to equipment and transportation, and \$9.5 billion (12 percent) supported training and operations. These allocations are shown in Figure 5 on page 14.

Agency Operations

Agency operations obligations directly funded diplomatic programs and capital and operating costs associated with the U.S. Embassy Kabul. Funds were obligated to provide diplomatic and consular personnel with safe and functional facilities. Mission-related obligations from FY 2002 through June 30, 2025, totaled more than \$13.5 billion. Additionally, agency operations included \$1.5 billion in obligations for USAID operating expenses and \$788.8 million in obligations for oversight.

Capacity Building/Democracy and Governance

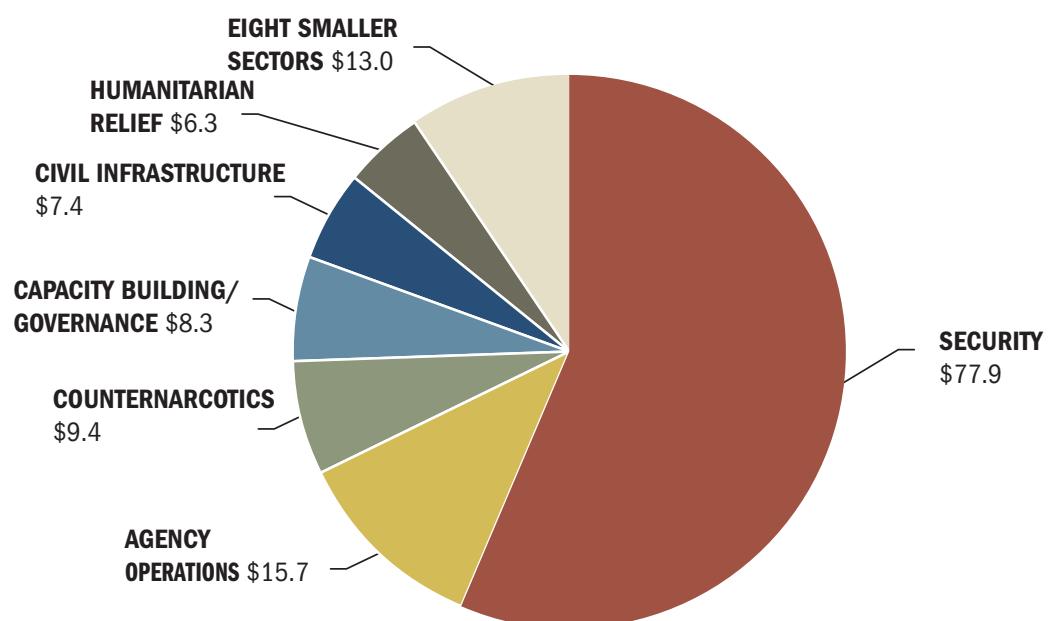
Capacity building/democracy and governance sector obligations invested in establishing a broadly accepted national government intended to promote national unity and serve the needs of the Afghan people. This sector included projects intended to support the rule of law and promote free and fair elections. Eight funding accounts contributed to this sector's total obligations of \$8.3 billion, with 66 percent coming from the Economic Support Fund, and 29 percent coming from the INCLE account.

Counternarcotics

Most of the \$9.4 billion in the counternarcotics sector's obligations were directed at programs that promoted agriculture alternatives to poppy cultivation and efforts to reduce drug trafficking. Counternarcotics obligations flowed through eight funding accounts with DICDA and INCLE obligating \$3.3 billion and \$2.2 billion, respectively. ASFF also obligated \$1.3 billion for counternarcotics activities associated with Afghanistan's SMW.

FIGURE 4

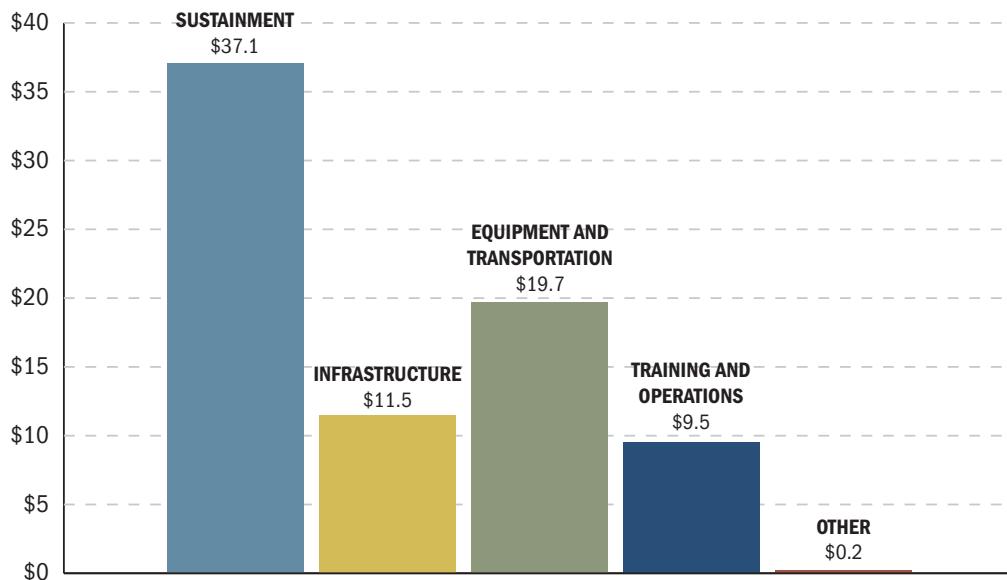
OBLIGATED FUNDS BY SECTOR, FY 2002 TO JUNE 30, 2025 (\$ BILLIONS)



Source: SIGAR analysis.

FIGURE 5

SECURITY SECTOR OBLIGATIONS, FY 2002 TO JUNE 30, 2025 (\$ BILLIONS)



Source: SIGAR analysis.

MULTILATERAL CONTRIBUTIONS TO AFGHANISTAN RECONSTRUCTION

The United States and other donor nations provided significant funding to support Afghanistan reconstruction efforts through the UN's Office for the Coordination of Humanitarian Affairs (UN OCHA), the United Nations Assistance Mission in Afghanistan (UNAMA), the NATO Resolute Support Mission, and four main multilateral trust funds: the Afghanistan Reconstruction Trust Fund (ARTF), renamed in July 2023 to the Afghanistan Resilience Trust Fund, managed by the World Bank Group (WBG), the Law and Order Trust Fund for Afghanistan (LOTFA) managed by the United Nations Development Program, the Afghan National Army Trust Fund (NATF) managed by NATO, and the Afghanistan Infrastructure Trust Fund (AITF) managed by the Asian Development Bank (ADB).

Cumulative contributions to these organizations since 2002 amounted to \$47.6 billion, as of June 30, 2025, with the United States contributing \$13.0 billion of this total. (These contributions are included in the total obligation amounts presented in the previous section.²⁷) As shown in Figure 6 on page 16, the five largest international donors were the United States, the United Kingdom, Germany, Japan, and the European Union. These donors comprised 63 percent of all multilateral contributions. In addition to these amounts, the WBG and the ADB made financial commitments of \$12.16 billion to Afghanistan from 2002 through August 15, 2021.²⁸

UN OCHA continues to lead emergency appeals and annual or multi-year humanitarian response plans for Afghanistan. Donor nations contributed \$8.1 billion to UN OCHA-sponsored programs after the U.S. withdrawal through June 30, 2025, including

TABLE 5

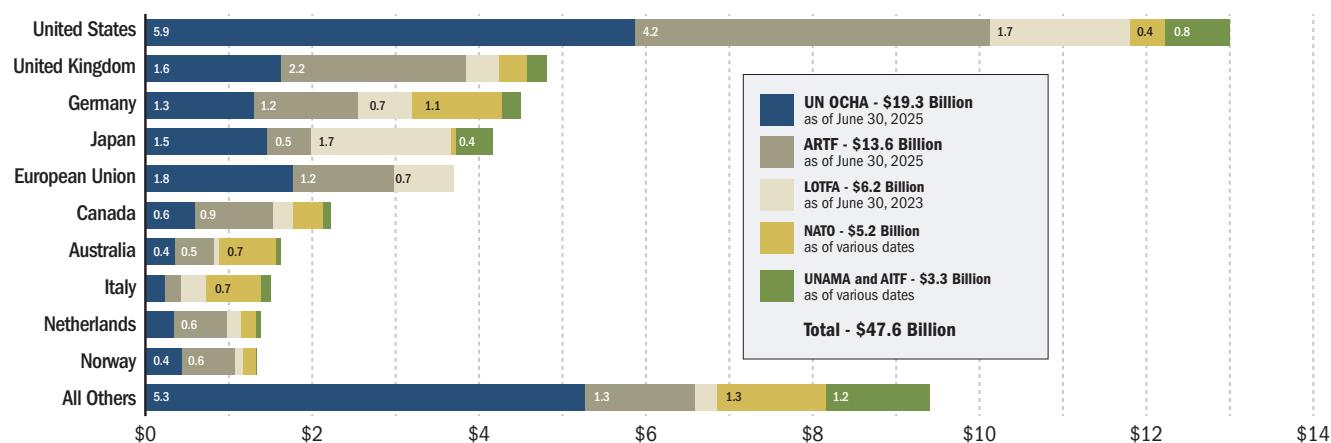
OBLIGATIONS BY SECTOR, FY 2002 TO JUNE 30, 2025 (\$ BILLIONS)			
Sector	Obligations	Percent of Total	Description
Security	\$77.9	56%	Security funds were primarily obligated in support of the ANDSF and included funding for security-related sustainment, infrastructure, equipment and transportation, and training and operations activities.
Agency Operations	15.7	11%	Agency operations included funding for diplomatic programs, embassy construction and operating costs, and oversight.
Counternarcotics	9.4	7%	Counternarcotics programming promoted agriculture alternatives to poppy cultivation and efforts to reduce drug trafficking.
Capacity Building / Democracy and Governance	8.3	6%	Capacity Building/Democracy and Governance obligations supported the establishment of a broadly accepted national government intended to promote national unity and serve the needs of the Afghan people.
Civil Infrastructure	7.4	5%	Civil infrastructure awards expanded and improved citizens' access to economic and social infrastructure. The building and refurbishing of infrastructure were intended to boost economic growth and agricultural yields, connect rural Afghans to services, and provide schools, clinics, and courthouses for Afghan citizens.
Humanitarian Relief	6.3	5%	Humanitarian relief obligations supported the Afghan people through the provision of humanitarian assistance addressing urgent health, nutrition, water, and shelter needs.
Stabilization	4.0	3%	Stabilization awards focused on projects aimed at improving security, extending the reach of the Afghan government, and facilitating reconstruction in priority provinces. Their core objective was to improve stability so that more traditional forms of development assistance could resume.
Economic Growth	2.4	2%	Economic growth award objectives included promoting a thriving economy, led by the private sector, through improving economic policy and the business environment. The awards also were committed to promoting macroeconomic reform, revenue collection, and privatization of state-owned enterprises.
Health	2.3	2%	Health awards aimed to improve the health status of the general population. The activities included training essential health care professionals, educating Afghans about better health habits, enhancing provider care, and developing and implementing quality assurance systems. Basic health care for rural communities was a priority, with an emphasis on women and children's health.
Education	1.7	1%	Education awards supported basic education, higher education, and literacy, combined with productive skills training for out of school youth and adults. Awards focused on improving teaching, enhancing institutional systems that sustain quality teaching, and providing instructional materials.
Program Support	1.4	1%	Program Support awards implemented activities designed to support the achievement of other U.S. program goals and objectives.
Agriculture	0.9	1%	Agriculture assistance concentrated on improving food security, increasing agricultural productivity and rural employment, and improving family incomes and well-being.
Gender	0.3	<1%	Gender awards were designed to help remove constraints on women's potential with the intent to ensure a better future for Afghanistan's women, their families, communities, and the country. Awards supported legal rights for women, helped them gain access to public services and jobs, built their capacity, and encouraged their inclusion in public life.
Other	0.1	<1%	Other awards are those that do not fit into any of the above sectors.
TOTAL OBLIGATIONS	\$138.0		

Source: SIGAR analysis.

humanitarian contributions from the WBG and ADB of \$392.2 million and \$580.6 million, respectively. After the U.S. withdrawal, funding for UNAMA has continued and in March 2025, the UN Security Council renewed UNAMA's mandate through March 17, 2026. The World Bank reported that contributions to the ARTF ceased after the Taliban takeover, but resumed in September 2022. As of June 30, 2025, the ARTF was supporting six active projects with \$1.5 billion in approved grant funding to address health, food security, water, education, community resilience and livelihoods, and empower microfinance providers and enterprises. LOTFA discontinued its projects in August 2021. The NATO Resolute Support Mission terminated in September 2021, and the ADB froze all AITF funded projects on August 15, 2021.

FIGURE 6

CONTRIBUTIONS BY 10 LARGEST DONORS AND OTHERS TO MULTILATERAL INSTITUTIONS IN AFGHANISTAN (UN OCHA-REPORTED PROGRAMS, ARTF, LOTFA, NATO, UNAMA, AND AITF) SINCE 2002 (\$ BILLIONS)



Note: "NATO" consists of NATO ANA Trust Fund (NATF) contributions of \$3.45 billion through January 11, 2022, and NATO member assessments for Resolute Support Mission costs of \$1.78 billion for 2015–2021. UNAMA costs of \$2.89 billion for 2007–2025, and AITF contributions net of refunds of \$0.39 billion (excluding those by NATF of \$0.22 billion) as of March 31, 2023. The Afghanistan Reconstruction Trust Fund changed its name to the Afghanistan Resilience Trust Fund (ARTF) in July 2023.

Source: SIGAR, *Quarterly Report to the United States Congress*, SIGAR-2021-QR-4, October 30, 2021, p. 58; SIGAR, *Quarterly Report to the United States Congress*, SIGAR-2023-QR-3, July 30, 2023, p. 42; SIGAR, *Quarterly Report to the United States Congress*, SIGAR-2025-QR-3, July 30, 2025, p. 82.

ON-BUDGET ASSISTANCE

Prior to the collapse of the Afghan government in August 2021, U.S. reconstruction funding for Afghanistan took two forms. The first was on-budget assistance, which encompassed donor funds aligned with Afghan government plans, included in budgets approved, and managed by the Afghan parliament treasury. On-budget assistance was delivered either bilaterally from a donor government to Afghan government entities, or through multilateral trust funds. As shown in Table 6 on the following page, the United States provided more than \$17.3 billion in on-budget assistance to the Afghan government, nearly \$6.0 billion of which was funneled through multilateral trust funds. After the collapse of the former Afghan government, the United States terminated all on-budget assistance. The second

TABLE 6

form of funding was off-budget assistance, which encompassed donor funds excluded from the Afghan national budget and not managed through Afghan government systems.²⁹ U.S. off-budget assistance disbursements as of June 30, 2025, totaled more than \$104.0 billion.

FUND TRACKING: REQUIREMENTS AND CHALLENGES

SIGAR Statutory Reporting Requirements for Appropriations

Section 1229(i) of the National Defense Authorization Act for Fiscal Year 2008, Pub. L. No. 110-181, as amended, states that the Inspector General shall submit to the appropriate congressional committees a quarterly report summarizing, in part, “the activities under programs and operations funded with amounts appropriated or otherwise made available for the reconstruction of Afghanistan.” The quarterly report was to include, among other things, “operating expenses of agencies or entities receiving amounts appropriated or otherwise made available for the reconstruction of Afghanistan.”³⁰

The report was also required to include information concerning “amounts appropriated or otherwise made available for the reconstruction of Afghanistan,” which included funding for “any major contract, grant, agreement, or other funding mechanism entered into by any department or agency of the United States Government that involved the use of amounts appropriated or otherwise made available for the reconstruction of Afghanistan with any public or private sector entity for any of the following purposes: (A) To build or rebuild physical infrastructure of Afghanistan. (B) To establish or reestablish a political or societal institution of Afghanistan. (C) To provide products or services to the people of Afghanistan.”³¹



Members of Khost Provincial Reconstruction Team meet with engineers and beneficiaries to discuss an upcoming infrastructure project on May 2, 2010. (DOD photo)

U.S. ON-BUDGET ASSISTANCE TO AFGHANISTAN, 2002 TO AUGUST 2021 (\$ BILLIONS)

Assistance Type	Disbursements
Government-to-Government	\$11.4
DOD	10.5
USAID	0.8
State	0.1
Multilateral Trust Funds	6.0
ARTF	4.1
LOTFA	1.7
AITF	0.2
TOTAL ON-BUDGET ASSISTANCE	\$17.3

Source: SIGAR, *Quarterly Report to the United States Congress*, SIGAR-2021-QR-4, October 30, 2021, p. 43.

SIGAR met this statutory mandate in every quarter since October 2008. Most recently, cumulative appropriations are summarized in Table F.10, “U.S. Appropriations Made Available for Afghanistan Reconstruction and Post-Withdrawal Assistance, FY 2002 to June 30, 2025,” in SIGAR’s *Quarterly Report to the United States Congress*, dated July 30, 2025.

DOD Omissions and Misstatements Prevented Complete and Accurate Reporting

The examples below illustrate the challenges in reporting DOD funding data.

DOD’s Reporting on Reconstruction Funding was Incomplete

Despite repeated requests from SIGAR, DOD did not provide an accounting of obligations and expenditures that funded DOD personnel that supported its Afghanistan reconstruction-related mission to train, advise, and assist (TAA) the ANDSF. The ASFF and other DOD accounts generally paid for contractors supporting the ANDSF; however, DOD’s own TAA activities and the associated expenditures related to these activities, while potentially significant, were not reported to SIGAR. Additionally, oversight numbers exclude DOD’s Office of Inspector General (OIG) amounts. Despite issuing 55 reports from 2009 to 2020 examining the DOD’s support of the ANDSF, DOD OIG indicated that its office had “no operating expenses to support reconstruction efforts in Afghanistan,” nor had DOD OIG conducted “activities under programs and operations funded with amounts appropriated or otherwise made available for the reconstruction of Afghanistan.” As such, SIGAR’s reporting does not include DOD activities related to the TAA mission or DOD OIG costs.³²



A U.S. Marine observes an ANA soldier at the Helmand Regional Military Training Center at Camp Shorabak. The U.S. Marine Corps was forced to redeploy to Helmand following the collapse of the ANA 215th Corps in 2015. (U.S. Marine Corps photo by Lucas Hopkins)

DOD's ASFF Reporting Overstated Obligation and Disbursement Balances

A DOD OIG audit of DOD's financial management of the ASFF account, issued in June 2023, found that DOD "mismanaged ASFF appropriated funds." Specifically, with respect to SIGAR, the report found that DOD "misstated the ASFF status of funds reports used to populate congressional reports issued by SIGAR." The misstatements were the result of a series of internal transfers from the ASFF account to the Foreign Military Sales (FMS) Trust Fund and the related management of the transferred funds within the FMS Trust Fund.

The DOD OIG audit report indicated that between FY 2005 and FY 2022, Defense Security Cooperation Agency (DSCA) personnel transferred \$47.5 billion from the ASFF account to the FMS Trust Fund. Within DOD's financial reports, however, the transferred funds were recorded as obligated and disbursed when in fact they had simply been moved from the ASFF account to the FMS Trust Fund as a matter of administrative convenience. This series of transactions overstated obligation and disbursement data in each quarter that funds were transferred.³³

Once the funds were transferred, DSCA gave the obligating authority to six DOD military components, which were responsible for obligating and disbursing the funds. However, not all funds were obligated and once the obligating authority was disbursed, DSCA lost the ability to readily consolidate or track the obligations and disbursements at the award level or in total. At the time this final SIGAR report was issued, DOD had not corrected ASFF reporting to reflect accurate obligation and disbursement balances. As of June 30, 2025, ASFF spending reported to Congress is overstated by at least \$2.9 billion and possibly as high as \$9.1 billion, as shown in Table 7, which details two portions of the overstatement.³⁴

By significantly overstating ASFF obligations and disbursements information over a 15-year period, DOD prevented SIGAR from accurately analyzing ASFF appropriations in its quarterly reports to Congress. The DOD OIG recommended that DSCA and the Office of the Under Secretary of Defense/Comptroller assist SIGAR in reporting restated ASFF obligated and disbursed balances. More than two years have passed since DOD OIG issued its audit; DOD has not addressed its OIG's recommendations and may not be able to do so. ASFF obligations and disbursements remain unreconciled, and DOD has not provided answers to SIGAR's repeated queries related to the potential spending overstatement. With SIGAR sunsetting, it can no longer oversee the closure of DOD's reconciliation efforts. Due to the magnitude of the potential errors, Congress may wish to pursue the matter further.³⁵

TABLE 7

ASFF SPENDING ESTIMATE, AS OF JUNE 30, 2025 (\$ BILLIONS)	
ASFF Reported Disbursements	\$74.5
Reconciling Items	
Funds Not spent in the FMS Trust Fund	(2.9)
Other Expired or Undisbursed Funds	(6.1)
Potential Overstatement	(9.1)
ASFF ESTIMATED SPENDING	\$65.4

Note: Funds Not Spent in the FMS Trust Fund: this line item includes \$2.23 billion in canceled funds returned to the U.S. Treasury, and \$0.7 billion in other amounts that have not yet been obligated or liquidated.

Other Expired or Undisbursed Funds: DSCA indicated that \$6.1 billion in expired or undisbursed funds were returned to the ASFF account. However, at the time this final SIGAR report was issued, DOD could not definitively state if any of the returns were reflected in the cumulative Appropriation Status reports (Army's AR(M) 1002 report) provided to and used by SIGAR to analyze and report ASFF appropriations to Congress. Where DOD recorded the returns impacts the ASFF spending estimate. SIGAR included the entire amount of returns as of June 30, 2025, to show the magnitude of the potential misstatement.

Source: SIGAR, *Quarterly Report to the United States Congress*, SIGAR-2025-QR-3, July 30, 2025, p. 75.



CHAPTER 3

WHAT WAS SAVED, WHAT WAS WASTED, AND WHAT WAS LEFT BEHIND

Since SIGAR's inception in 2008, its oversight of Afghanistan's reconstruction has generated over \$4.6 billion in cost savings to U.S. taxpayers. In addition, SIGAR's audits and investigations identified between \$26 billion and \$29.2 billion of waste, fraud and abuse. Lastly, the United States left behind over \$38 billion in military equipment and military and civilian infrastructure.

Armored vests lie on the ground inside a hangar at the airport in Kabul on August 31, 2021, after the United States withdrew from Afghanistan. The Afghan Air Force's A-29 attack aircrafts are pictured in the background. (AFP photo by Wakil Kohsar)

OVER \$4.6 BILLION GENERATED IN COST SAVINGS TO U.S. TAXPAYERS

SIGAR generated \$4.61 billion in cost savings to U.S. taxpayers. SIGAR's Audits and Inspections Directorate generated \$2.51 billion in cost savings to U.S. taxpayers through 793 performance audits, evaluation, inspection, financial audit, and other reports. SIGAR's Investigations Directorate generated \$2.10 billion in cost savings to U.S. taxpayers through 659 closed investigations. (This includes more than \$400 million in potential recovered costs on a recently concluded prosecution for which financial penalties are pending.)

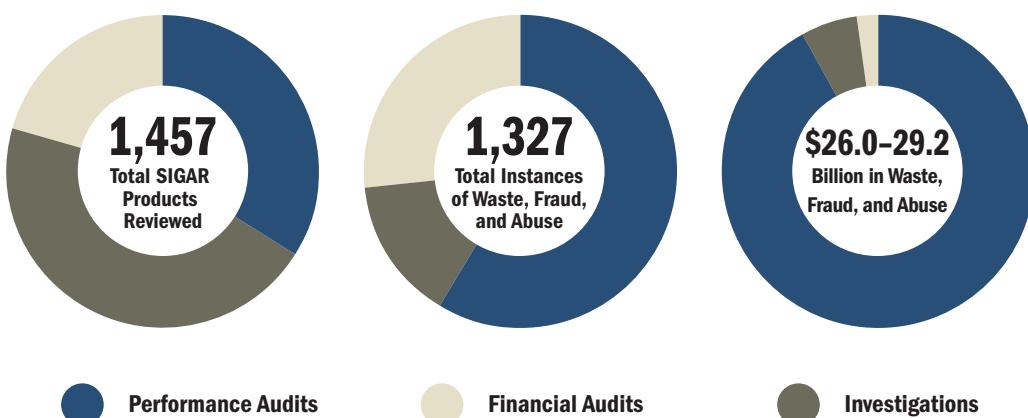
SIGAR IDENTIFIED BETWEEN \$26.0 AND \$29.2 BILLION OF WASTE, FRAUD, AND ABUSE

In September 2017, Congress requested information about the amount of waste, fraud, and abuse uncovered through SIGAR's oversight work. In response, SIGAR issued a report in July 2018 identifying approximately \$15.5 billion in waste, fraud, and abuse uncovered from SIGAR's inception in 2008 through December 31, 2017.³⁶ In October 2020, SIGAR updated that report, providing Congress with information on an additional \$3.4 billion in waste, fraud, and abuse identified from January 1, 2018, through December 31, 2019.³⁷ This section provides Congress with a second update, providing the cumulative total of waste, fraud, and abuse identified in the agency's 793 performance and financial audit reports and 659 closed investigations from SIGAR's inception through September 20, 2025.³⁸

SIGAR identified 1,327 instances of waste, fraud, and abuse totaling between \$26.0 billion and \$29.2 billion in 793 issued reports and 659 closed investigations. Specifically, SIGAR's performance reports identified 730 instances (63 percent of total instances), financial audits identified 352 instances (30 percent of total instances), and closed investigations identified 78 instances (7 percent of total instances). Figure 7 below shows the breakdown of the number of instances of waste and total dollar value associated with each category.

FIGURE 7

NUMBER OF REPORTS REVIEWED AND TOTAL INSTANCES AND ASSOCIATED VALUE OF WASTE, FRAUD, AND ABUSE IDENTIFIED, BY CATEGORY



Source: SIGAR, Data compiled from SIGAR performance reports, financial audit reports, and closed investigations.

Performance Reports Identified at Least \$23.2 Billion in Waste

SIGAR's 496 performance audit reports identified 730 instances of waste totaling between \$23.2 billion and \$26.2 billion.³⁹ These included programs and projects that lacked clear program goals, performance measures, and quality data to support management decisions, as well as assets that were abandoned, not used, or posed safety hazards. Below are six examples—totaling nearly \$14 billion in waste—of the at least \$23.2 billion identified in SIGAR's performance audit reports:

1. **\$7.3 Billion on Ineffective Counternarcotics Programming:** In June 2018, SIGAR reported on the billions spent by the U.S. in Afghanistan on counternarcotics programs that appear to have done little to stem the production and exportation of illicit drugs.⁴⁰ Despite spending \$7.3 billion on counternarcotic programming, Afghanistan was the world's largest opium supplier at the time we wrote our report, producing more than 90 percent of the world's opium in 2018.⁴¹ The narcotics industry in Afghanistan contributed to rampant corruption and fraud, and increased political instability and insecurity, which made U.S. efforts to stabilize the country challenging, if not impossible.
2. **\$4.7 Billion on Ineffective Stabilization Programming:** Beginning in September 2016, SIGAR issued five reports focusing on the United States' failed stabilization efforts in Afghanistan.⁴² The term "stabilization" refers to a specific process designed to keep insurgents out of an area after they were initially expelled by security forces, and subsequent efforts to develop the capacity of legitimate local governments and communities wherein they can peaceably manage conflict and prevent a resurgence of violence. Stabilization programming is transitional in nature, and may include efforts to establish civil security, provide access to dispute resolution, deliver targeted basic services, and establish a foundation for the return of displaced people and longer-term development.

SIGAR's performance reports stated that at the policy level, the U.S. government overestimated its ability to build and reform government institutions in Afghanistan as part of the stabilization strategy and set unrealistic expectations of what could be achieved. As a result, U.S. agencies spent far too much money, far too quickly, in a country woefully unprepared to absorb it. SIGAR found that stabilization programs in Afghanistan were unsuccessful in building and reforming government institutions, and large sums of U.S. stabilization dollars often exacerbated conflicts, enabled corruption, and bolstered support for insurgents. Money spent was often the metric of success, instead of more nuanced performance metrics.

3. **\$675 Million on Ineffective Private Business Development Projects:** In January 2018, SIGAR reported on DOD's TFBSO projects in Afghanistan.⁴³ The report noted that Congress authorized TFBSO to fund projects aimed at reducing violence, enhancing stability, and supporting economic normalcy in Afghanistan through strategic business and economic activities. The report found that the organization's long-term goals were not met because TFBSO did not set clear organization-wide

targets—such as the jobs it expected to create or government revenues it expected to generate—and did not initially establish organization-wide metrics to collect project data and evaluate its own performance. SIGAR also found TFBSO’s poor planning, contracting, and oversight practices to have contributed to incomplete projects, unsatisfactory work, and project delays, which resulted in wasted U.S. taxpayer funds. SIGAR concluded that \$246 million of the \$316 million (78 percent) that TFBSO spent on its projects did not fully achieve their objectives, and that the total \$675 million spent by TFBSO (\$316 million on projects and \$359 million on organizational operating costs) was a waste of U.S. taxpayer funds.

4. **\$486 Million for Unused Aircraft:** In July 2018, SIGAR reported that DOD spent \$486 million to procure 20 G-222 aircraft for the Afghan Air Force that did not meet operational requirements.⁴⁴ The planes were barely flown, and 16 of them were sold and scrapped in Afghanistan for approximately six cents per pound, totaling \$32,000 repaid to the U.S. government.
5. **\$335 Million for an Underutilized Power Plant:** In August 2015, SIGAR reported that USAID constructed a \$335 million power plant that had been severely underutilized since its construction and was operating at less than one percent of its capacity during the examination period.⁴⁵
6. **\$85 Million for an Unfinished and Unused Hotel:** In November 2016, SIGAR reported about serious deficiencies in the management and oversight of \$85 million in loans made by the Overseas Private Investment Corporation (OPIC) for the construction of a hotel and an adjacent apartment building directly across the street from the U.S. Embassy Kabul.⁴⁶ At the time of SIGAR’s inspection, both the hotel and the apartment building were incomplete, abandoned empty shells, and both loans were in default.

Closed Investigations Identified Between \$871 Million and \$1.1 Billion in Waste

SIGAR’s 659 closed investigations reviewed \$25.3 billion in costs and identified 78 instances of waste, totaling between \$871 million and \$1.1 billion.

Identified Instances of Fraud

Since 2008, SIGAR identified 118 instances of fraud totaling \$594 million. These account for nine percent of instances and two percent of the total cost of, waste, fraud, and abuse.⁴⁷ SIGAR’s Investigations Directorate investigated federal procurement fraud, contract fraud, theft, corruption, bribery of government employees and public officials, and a variety of civil matters pertaining to abuse of U.S. government funds.

Identified Instances of Abuse

Cumulatively, SIGAR identified 49 instances of abuse totaling \$1.3 billion, which accounted for four percent of instances and four percent of the total amount, of waste, fraud, and abuse. Specifically, SIGAR’s performance audit reports identified 16 instances totaling \$34.5 million, and closed investigations identified 33 instances totaling \$1.3 billion.

SIGAR's July 2018 report that reviewed USAID's Mining Investment and Development for Afghanistan Sustainability Program, which supported the Afghanistan Ministry of Mines and Petroleum's ability to regulate Afghanistan's extractives production, identified one instance of abuse.⁴⁸ SIGAR found that the program was unable to achieve its objectives due to abuse of power by Afghan government officials, specifically their involvement in illegal mining operations. The success of the program was predicated on the expectation that Afghanistan's parliament had the political will to pass an improved extractives mining law at the project's inception. However, according to a USAID official, there was no political will to crack down on illegal mining operations since they were run by or benefited members of parliament, their families, or other powerful Afghans.

THE UNITED STATES LEFT BEHIND BILLIONS IN MILITARY EQUIPMENT AND MILITARY AND CIVILIAN INFRASTRUCTURE WHEN IT WITHDREW FROM AFGHANISTAN

Billions of dollars spent to develop and equip the Afghanistan National Defense and Security Forces (ANDSF), as well as billions of dollars spent to construct civilian infrastructure were lost when the United States withdrew from Afghanistan in August 2021. Together, the U.S. obligated at least \$38.6 billion equipping and building infrastructure for the ANDSF and constructing civil infrastructure for the benefit of the Afghan people. While SIGAR was unable to inspect any of the equipment or facilities constructed for the ANDSF after the U.S. withdrawal, SIGAR was able to inspect 90 civil infrastructure assets between October 2024 and December 2024.

From fiscal year 2002 through June 30, 2025, the United States obligated \$31.2 billion on infrastructure, equipment, and transportation for the ANDSF. Of the \$31.2 billion, the U.S. spent \$19.7 billion to equip and transport the ANDSF. This funding included the purchase of 96,000 ground vehicles, 51,180 general purpose or light tactical vehicles, 23,825 High Mobility Multipurpose Wheeled Vehicles, nearly 900 armored combat vehicles, 427,300 weapons, 17,400 helmet-worn night vision devices, at least 162 aircraft, and other items. As of July 31, 2021—approximately two weeks prior to the Taliban takeover—DOD records indicated that the Afghan Air Force had 162 U.S.-provided aircraft in its inventory, of which 131 were usable.⁴⁹ The remaining \$11.5 billion of the \$31.2 billion spent by the U.S. was devoted to the construction of infrastructure for the ANDSF, including the construction of headquarters, training facilities, and bases or outposts around the country.

As noted above, due to the Taliban takeover, SIGAR was unable to inspect any of the equipment provided to, or facilities constructed for, the ANDSF following the Afghan government's collapse. However, DOD determined that the United States left behind approximately \$7.1 billion in material and equipment it had given to the ANDSF. Similarly, any remaining ANDSF facilities that were not destroyed, can be assumed to be under Taliban control. These U.S. taxpayer-funded equipment, weapons, and facilities have formed the core of the Taliban security apparatus.

The United States also obligated \$7.4 billion for civil infrastructure construction from FY 2002 through June 30, 2025. This includes civil and electrical infrastructure such as powerlines and transformers, roads and bridges, commercial developments, public facilities, schools, and hospitals. From October 2024 through December 2024, SIGAR inspected 90 locations where the U.S. had spent at least \$1.4 billion constructing civil infrastructure. SIGAR found that 78 of the 90 assets inspected were operational and being used as the U.S. intended—to the benefit of Afghan civilians. SIGAR also found that seven of the assets were operational but not being used as intended, and that five of the assets were no longer operational. For the assets being used but not as intended:

- One pedestrian bridge was used for vehicular traffic;
- One commercial facility was used as a soccer field because it had fallen into disrepair due to a lack of maintenance and theft of equipment;
- One government administrative facility was used to house Taliban security forces instead of government administrators;
- Three women's school dormitories were used to house male students; and
- One hospital was not being used as intended due to staffing and operational issues.

SIGAR's inspections also found that 61 of the 90 civil infrastructure assets showed some evidence of maintenance since the Taliban takeover.

Lastly, in addition to the billions of dollars the United States spent on equipment and infrastructure construction, the U.S. also provided \$17.3 billion in on-budget assistance—funding provided directly to the Afghan government, or through multilateral trust funds—to the Afghan government from FY 2002 through August 15, 2021.⁵⁰ While the amount of on-budget assistance changed over time, the amount of money in Afghan government-controlled accounts changed regularly as funds were added or disbursed.

SIGAR determined that approximately \$57.6 million likely remained in Afghan government-controlled accounts when the Taliban took over in August 2021. The United States was unable to recover these funds and SIGAR determined that it is likely that the Taliban were able to access at least a portion of this money when they took over Afghanistan's Ministry of Finance.

میر مقتش ویژه برای بازسازی افغانستان



غاؤنی لپاره د خانگری میر مقتش (د افغانستان)



CHAPTER 4

MAJOR FINDINGS OF AUDITS AND INSPECTIONS OF U.S. ASSISTANCE TO AFGHANISTAN

INTRODUCTION TO AUDITS AND INSPECTIONS

Enabling legislation mandated that SIGAR provide independent and objective oversight relating to the programs and operations funded with amounts appropriated, or otherwise made available, for the reconstruction of Afghanistan.⁵¹ In response, SIGAR created the Audits and Inspections Directorate, led by an assistant inspector general based at SIGAR headquarters in Arlington, Virginia. The primary mission of the Audits and Inspections Directorate was to conduct audits to prevent and detect waste, fraud, and abuse in programs and operations for the reconstruction of Afghanistan. However, since the withdrawal of U.S. troops from Afghanistan in August 2021, the directorate's reports also focused on the review of U.S. humanitarian assistance provided to Afghanistan to ensure U.S. funds were used as intended and not diverted to the Taliban.

To maximize oversight and prevent duplication, SIGAR participated in a Joint Strategic Planning Group that included inspectors general for DOD, State, and USAID. The group coordinated audit plans and deconflicted any potential overlap in work.⁵²

SIGAR operated in compliance with the Council of the Inspectors General on Integrity and Efficiency Quality Standards for Federal Offices of Inspector General. These standards

Spectators watch as Afghan wrestlers compete during a traditional wrestling competition at a field in Arghandab district of Kandahar Province on May 8, 2025. (AFP photo by Sanaullah Seiam)

set forth the overall quality framework for managing, operating, and performing work conducted by an Office of Inspector General. Specifically, the standards incorporate by reference the professional standards for audits as prescribed by the Comptroller General of the United States for audits of federal entities, organizations, programs, activities, and functions. These standards are set forth in Government Auditing Standards, 2018 Revision, also known as generally accepted government auditing standards, and in the April 2021 technical update to the standards. They require that SIGAR plan and perform its work to obtain sufficient, appropriate evidence to provide a reasonable basis for SIGAR's findings and conclusions based on audit objectives.

To fulfill its legislative oversight mandate, SIGAR conducted performance audits, inspections, evaluations, financial audits, and other reviews. These products document the agency's oversight on a wide range of reconstruction activities, identified problems associated with U.S. reconstruction efforts, and made recommendations to improve efficiency and effectiveness. The products included:

- **Performance Audits**, which provided objective analyses, findings, and conclusions to assist management and those charged with governance and oversight to, among other things, improve program performance and operations, reduce costs, facilitate decision making by parties with responsibility to oversee or initiate corrective action, and contribute to public accountability.
- **Inspections**, which determined whether construction of a building, facility, or other type of infrastructure was conducted in accordance with contract requirements, applicable construction requirements, or other criteria, and whether the building or facility was used and maintained as intended.
- **Evaluations**, which provided factual and analytical information, and determined compliance with applicable laws, regulations, policies, and/or program requirements.
- **Financial Audits**, which examined cost-reimbursable awards issued by DOD, State, USAID, and other U.S. agencies. Cost reimbursable awards authorize contractors and grantees to be reimbursed based on the amount of their allowable incurred costs.⁵³
- **Other** related SIGAR products used to make an inquiry, share observations made during the audit that may not warrant a full audit report, or raise an issue needing immediate attention. Examples include alert letters, inquiry letters, and special project reports.⁵⁴ This category excludes quarterly reports and testimony to Congress.

PERFORMANCE AUDIT, INSPECTION, AND EVALUATION REPORTING

From 2002 through June 30, 2025, U.S. agencies obligated \$138.0 billion of the \$148.2 billion Congress appropriated for Afghanistan's reconstruction.⁵⁵ To provide oversight of the more than \$122 billion the United States obligated for reconstruction programs in Afghanistan, SIGAR conducted 476 performance audits, inspections, evaluations, and other reports from its inception through September 20, 2025. These reports addressed all aspects of Afghanistan's reconstruction. Table 8 on the next page shows the amount of funds obligated for reconstruction by sector and the number of performance audits, inspections, evaluations, and other related reviews the agency conducted.

TABLE 8

SECTORS COVERED BY SIGAR PERFORMANCE AUDITS, EVALUATIONS, AND INSPECTIONS						
Sector	Obligated Amount (\$ Billions)	Number of Performance Reports	Number of Evaluation Reports	Number of Inspection Reports	Number of Other Reports	Total Number of Reports
Security	\$77.9	42	2	38	41	123
Counternarcotics	\$9.4	4	0	0	3	7
Capacity Building and Governance	\$8.3	23	1	0	11	35
Civil Infrastructure	\$7.4	14	1	43	46	104
Humanitarian Relief	\$6.3	2	2	0	1	5
Stabilization	\$4.0	10	0	0	4	14
Economic Growth and Development	\$2.4	9	1	0	3	13
Health	\$2.3	4	0	0	0	4
Education	\$1.7	2	1	0	1	4
Agriculture	\$0.8	1	0	0	3	35
Program Support	\$1.4	2	0	0	0	2
Women's Issues	\$0.3	7	0	0	3	10
Other	\$0.1	29	8	1	58	96
TOTAL	\$122.3	149	16	82	232	452

Note: The table excludes \$15.7 billion in obligations for agency operations. SIGAR's enabling legislation limits its scope of work to funding spent for the reconstruction of Afghanistan. As such, SIGAR did not examine funds spent on overall agency operations.

Source: SIGAR, *Quarterly Report to the United States Congress*, SIGAR-2025-QR-1, December 31, 2024. SIGAR Analysis of SIGAR performance, evaluation, and inspections reports issued from January 28, 2008, the date of SIGAR's enabling legislation, through December 31, 2024.

Security Sector Oversight

SIGAR issued 42 performance audits, 38 inspections, 2 evaluations, and 41 other reports examining the \$77.9 billion in obligations for security sector programming. The majority of U.S. funding in Afghanistan was spent on security in support of the ANDSF, including building infrastructure, supplying equipment, providing training, and supporting operations. SIGAR has reported that the United States lacked the political will to dedicate the time and resources needed to build a sustainable security sector in a war-torn and impoverished country. In addition, the Afghan government was dominated by corruption and people seeking personal gain, further eroding the efficacy of U.S. efforts. As a result, the U.S. government created an ANDSF that could not operate independently and set unrealistic milestones for ANDSF capability development, leading to its eventual collapse and the waste of billions of U.S. government funds. Below are examples of SIGAR's reporting on the security sector.

Salary Payments for Afghan Security Forces: In April 2011, January 2015, April 2015, and July 2022, SIGAR reported on U.S.-funds used to pay for salaries of ANDSF personnel.⁵⁶ The agency's April 2011 report found the personnel and payroll system for the Afghan Ministry of Interior did not provide reliable or consistent data and records of ministry personnel, potentially leading to the waste, fraud, or abuse of U.S. government funds. The agency's January 2015 report examined the Afghan National Police personnel and payroll systems and found "ghost" employees in inflated personnel rosters and salary payments, providing little assurance that U.S. taxpayer funds were not being subjected

to waste, fraud, or abuse. The agency's April 2015 report examined the Afghan National Army's personnel and payroll system and found continued and extensive internal control weaknesses that led to salary payments to "ghost" employees and inflated salary payments, again subjecting U.S. taxpayer funds to waste, fraud, and abuse.

Finally, SIGAR's July 2022 report documented that DOD spent \$64 million on a new consolidated personnel and payroll system that did not work as intended. As a result, U.S. funds continued to be used to make payments to "ghost" employees or for inflated salaries, resulting in DOD making at least \$232 million in improper salary payments. The report concluded that despite DOD not knowing the real personnel strength of the ANDSF, even with red flags indicating significantly overstated personnel numbers, the Department continued to request billions from Congress to fund the ANDSF right up until the collapse of the Afghan government in August 2021, subjecting those funds to waste, fraud, and abuse.

Infrastructure for Afghan Security Forces: In September 2013, SIGAR reported on \$4.7 billion in planned spending for 400 facilities to support the ANDSF.⁵⁷ SIGAR found that while DOD did take some cost saving measures, there were further opportunities to reduce waste. Specifically, DOD was funding the construction of permanent facilities that exceeded the ANDSF's needs. As a result of the report, DOD re-evaluated the number of facilities it intended to build and reduced those that were unneeded, resulting in estimated savings of \$600 million.

Unused Afghan Command and Control Facility: In May 2015, SIGAR reported on DOD's construction of a \$36 million command and control center for Afghan security forces in Helmand Province.⁵⁸ DOD requested funds to construct a facility to support the 2010 U.S. military surge, but the U.S. general in charge of the surge in Helmand requested that the facility not be built, as existing resources were already well-suited to the mission. However, that request was rejected by a higher-ranking U.S. general who believed that it would not be "prudent" to cancel a project for which funds had already been appropriated by Congress. DOD nearly completed the building's construction in April 2013, about seven months after the conclusion of the military surge, and it was never used, wasting \$36 million in U.S. government funding.

Uniforms and Equipment for Afghan Security Forces: In April 2017, SIGAR reported on \$415 million that DOD spent on uniforms and equipment such as helmets, body armor, boots, and sleeping bags for the ANDSF.⁵⁹ DOD's inventory management system relied on questionable or inaccurate personnel, consumption, and inventory data, and the department did not define roles and responsibilities for data input, ordering, and tracking. These issues resulted in DOD having difficulties in supplying and equipping ANDSF personnel, which in turn, affected their operational readiness. SIGAR concluded that DOD could not be certain that money it gave to the Afghan government for uniforms and equipment was spent on those items.

Program Support Efforts for the Sustainability of Afghan Security Forces: From June 2010 through July 2021, SIGAR issued nine reports on the United States' support and maintenance efforts to build ANDSF capacities so it could operate independently and sustain itself.⁶⁰ In September 2021, the Secretary of Defense testified before Congress that the collapse of the ANDSF took the Pentagon "...by surprise, and it would be dishonest to claim otherwise."⁶¹ However, for more than a decade—including only one month prior to the ANDSF's collapse—SIGAR had reported on a range of challenges to sustaining the ANDSF, contrary to the department's statement.

- In June 2010, SIGAR reported that the United States did not have a reliable system to monitor the progress of the ANDSF becoming sustainable, noting serious challenges with security conditions, mentor shortages, and inadequate training. The report also noted systemic ANDSF deficiencies, such as logistics problems, personnel attrition, inadequate personnel authorizations, infrastructure deficiencies, corruption, drug abuse, and illiteracy.
- In October 2012, SIGAR reported that the ANDSF continued to face challenges that would prohibit it from being fully capable of sustaining its facilities after the expected significant decrease in U.S. and coalition support in 2014, subjecting U.S. government funds to waste.
- In January 2014, SIGAR reported that the ANDSF would not meet DOD's goal to be 100 percent literate, especially given its 30 to 50 percent annual attrition rate, and that the literacy training programs in place were not sustainable. SIGAR concluded that the failure of the ANDSF to be 100 percent literate could place its ability to be an effective force at risk, and, consequently, put U.S. taxpayer funds at risk of waste.
- In February 2014, SIGAR followed up on its June 2010 report and found that the United States still did not have a reliable system to monitor ANDSF progress toward becoming a sustainable, effective fighting force.
- In January 2016, SIGAR reported that the ANDSF's engineering brigade was not even "partially capable," citing a lack of literacy and absenteeism as factors, and that it was unlikely that the brigade would be "fully capable" in the near future.
- In October 2018, SIGAR reported again that DOD still could not assess the effectiveness of its training efforts in building the ANDSF's capacity.
- In July 2020, SIGAR reported that the ANDSF could not sustain U.S. intelligence, surveillance, and reconnaissance training and programming; that the ANDSF was losing crucial and costly equipment; and DOD risked wasting U.S. government funds on training and programming that the ANDSF would not use.
- In April 2018 and July 2021, SIGAR reported on DOD's transition of fuel activities to the ANDSF. SIGAR found corruption within the ANDSF, noting that half of all fuel was stolen. SIGAR also found that DOD had not developed a transition plan or ensured that adequate controls and systems were in place so that the ANDSF could effectively and responsibly take control of fuel activities. SIGAR concluded that without fuel, ANDSF operations would cease, and that fuel theft and corruption would worsen.

Counternarcotics Sector Oversight

SIGAR issued four performance audits and three other reports examining the \$9.4 billion in obligations for counternarcotics sector programming. This money was spent on programs to reduce drug trafficking and promote agricultural alternatives to poppy cultivation, a major contributor to violence and insurgency in Afghanistan. The agency's reports found that the United States could not determine the impact of its counternarcotics programming, and without knowing the impact, potentially wasted U.S. funds. In addition, many program gains proved temporary and unsustainable because reductions in cultivation were often only possible under secure conditions. Below are examples of SIGAR's reporting on the counternarcotics sector.

Aircraft for Afghan Special Mission Wing: In June 2013, SIGAR reported on a \$772 million DOD program that purchased a fleet of planes for Afghanistan's special forces to conduct counternarcotics and counterterrorism missions.⁶² SIGAR found that DOD moved forward with its purchase of 48 new aircraft despite a lack of buy-in from the Afghan government, inadequate Afghan personnel to operate and maintain the new fleet, and the Afghan Special Forces failing to achieve full staffing. SIGAR concluded that if DOD continued with the purchase of the new fleet, it would waste U.S. funds as the fleet would go unused and unmaintained. In its comments on the report, DOD stated that it had awarded the contracts to purchase the aircraft and would complete the acquisition.

Drug Treatment in Afghanistan: In July 2019, SIGAR reported on State's \$50 million counternarcotics mission in Afghanistan, which included establishing a drug addiction treatment program, the operation and maintenance of drug addiction treatment centers, developing drug addiction treatment models, and recruiting and training Afghan clinical staff.⁶³ SIGAR found that State could not evaluate the program's performance because State did not follow agency or U.S. government professional standards on how to do so. As a result, State could not make informed decisions about its ongoing drug treatment programs, lacked an understanding of the impact of its programming, and did not ensure that the Afghan government could sustain the programming and facilities.

Narcotics Counter Threat Finance: In March 2021, SIGAR reported on U.S. counternarcotics efforts in Afghanistan, including at least \$22 million spent on counter threat finance efforts against the terrorist narcotics trade.⁶⁴ SIGAR found that DOD, State, and the U.S. Department of Justice (DOJ) were not required to, and thus did not, report the amount of funds spent on counterthreat financing efforts or determine the impact of these efforts. SIGAR also found that U.S. agencies identified challenges in implementing their current and future programming, but only DOD took steps to address those challenges. SIGAR concluded that U.S. agencies were missing an opportunity to learn about counter threat financing in Afghanistan, and without performance data, were also potentially wasting U.S. funds.

Capacity Building and Governance Sector Oversight

SIGAR issued 23 performance audits, 1 evaluation, and 11 other reports examining the \$8.3 billion in obligated funds for capacity building and governance sector programming. These funds were obligated to establish a broadly accepted national government intended to promote national unity and serve the needs of the Afghan people. SIGAR's audits showed that the inability of the Afghan government to reduce corruption and establish a fair and equitable justice system resulted in a failed attempt to promote national unity and garner the support of the Afghan people. Below are examples of SIGAR reporting on the capacity building and governance sector.

Anti-Corruption Efforts: Between December 2009 and August 2021, SIGAR issued six reports on the United States' efforts to reduce corruption within the former Afghan government.⁶⁵ These reports highlighted the powerfully corrosive effect that corruption had on core Afghan institutions, including the ANDSF. The reports noted that the Afghan government took steps to combat corruption but faced significant challenges to achieve tangible and long-lasting reforms, often focusing its efforts on intangible reforms and box-checking exercises that ultimately did little to reduce corruption.

Additionally, the reports found significant barriers to the Afghan government exercising its authority to prosecute powerful individuals suspected of corruption, which reduced trust in the Afghan court system as the powerful often appeared to escape justice. SIGAR also found that well-connected individuals and government officials had enriched themselves at the expense of the nation, and that the Afghan government had not stopped the illegal enrichment of public officials or the largely unregulated markets from fueling corruption. SIGAR concluded that neither the Afghan government nor the international donor community had consistently showed the political will to create an anti-corruption strategy with specific, time-bound, and verifiable targets with meaningful incentives for accomplishing them.

Rule of Law Efforts: In July 2011, January 2014, and July 2015, SIGAR reported on federal efforts to enhance the rule of law in Afghanistan.⁶⁶ SIGAR found that the U.S. government had spent over \$1 billion on rule of law efforts, yet these activities were not guided by a unified, comprehensive strategy, nor did they ensure programming sustainability. SIGAR concluded that without a unified, strategic approach, including specific performance metrics to measure performance, the United States risked spending funds on rule of law programs in a piecemeal, haphazard manner, without any assurance these efforts would achieve their intended goals and objectives. SIGAR concluded that U.S. agencies risked investing U.S. funds in ill-advised or misaligned programs that the Afghan government would not continue after U.S. funds were no longer available, and that the Afghan government should have taken greater responsibility to improve the rule of law. Without Afghan ownership of and capacity to sustain U.S. rule of law programs, the U.S. government would continue to spend taxpayer dollars without any assurance that those programs would have a lasting impact on the rule of law in Afghanistan.

Afghan Civil Servant Salary Support Payments: In October 2010 and July 2017, SIGAR reported on U.S. funds used to pay the salaries of Afghan civil servants.⁶⁷ SIGAR found that State and USAID provided salary support to Afghan government employees and embedded technical advisors without implementing safeguards designed to ensure that the funds were used as intended. By 2017, State and USAID had not implemented SIGAR's recommendations 7 years after they were made. SIGAR concluded in its July 2017 report that by not fully addressing most of SIGAR's recommendations, State and USAID risked providing salary support that would not align with U.S. strategic goals and objectives and increased the risk that funds could be misused or wasted.

Civil Infrastructure Sector Oversight

SIGAR issued 14 performance audits, 1 evaluation, 43 inspections, and 46 other reports examining the \$7.4 billion obligated for civil infrastructure sector programming. These funds were intended to build and refurbish Afghanistan's infrastructure to improve and expand citizens' access to civil services, such as schools, clinics, and courthouses. Overall, SIGAR found that many of these costly projects went unused or fell into disrepair, and, in some cases, were unwanted by the Afghan people, consequently wasting U.S. funds. U.S. agencies also failed to ensure that the projects were sustainable over the long term. Below are examples of the agency's reporting on civil infrastructure sector programming.

Status of U.S.-Funded Capital Assets: In February 2021, SIGAR updated prior reporting on nearly \$7.8 billion in U.S.-funded capital assets, including civil infrastructure.⁶⁸ SIGAR found that while the U.S. investment in Afghanistan's reconstruction had some notable successes, U.S. agencies too often built schools, prisons, hospitals, roads, bridges, and other facilities that were unused or abandoned, used but not as intended, deteriorated, or destroyed. SIGAR determined that U.S. agencies systematically did not consider whether the Afghans wanted or needed the facilities, or whether the Afghan government had the financial ability and technical means to sustain them. This resulted in \$2.4 billion of U.S. funds being wasted, though the actual amount of waste is almost certainly higher because SIGAR did not examine every capital asset that the U.S. funded. This waste occurred despite multiple laws stating that U.S. agencies should not construct or procure capital assets until they can show that the benefiting country has the financial and technical resources, and the capability to use and maintain those assets effectively.

Power Generation and Transmission: In September 2019, SIGAR reported on USAID's \$861 million Power Transmission Expansion and Connectivity project, which was intended to expand and improve Afghanistan's power grid.⁶⁹ SIGAR found that the project was more than 4 years behind schedule and had little to show for its efforts. The project's main accomplishment was constructing power substations that provided reliable electricity to 12,000 Afghan households. However, it did not meet many of its intended objectives and Afghan government officials characterized the project as a wasted opportunity. SIGAR concluded that USAID did not provide effective oversight, exposing U.S. funds to waste, fraud, and abuse, and that there may have been little benefit for either Afghanistan or the United States government in completing the project.

Public Roads: In October 2016, SIGAR reported on the \$2.8 billion spent by U.S. agencies to build Afghanistan's road infrastructure and the country's capacity to maintain it.⁷⁰ Despite this investment, Afghanistan's roads needed repair and efforts to build the Afghan government's capacity to effectively construct and maintain its roads had failed. SIGAR concluded that if the Afghan government did not take tangible actions, including passing legislation, the effective management and sustainment of Afghanistan's road infrastructure would remain an elusive goal, and that the country's crumbling road infrastructure would inhibit commerce and restrict Afghans' freedom of movement.

Public Schools and Dormitories: In April 2017, SIGAR reported on the construction of two four-story dormitories and a cafeteria for 800 female students at Balkh University in Mazar-i-Sharif.⁷¹ SIGAR found that the dormitories were 2 years behind schedule and were yet to be completed, resulting in the university incurring \$16,000 in monthly offsite housing expenses. SIGAR also found numerous construction deficiencies that would cause health and safety issues and determined that the lack of electricity to the dormitory would prevent it from being occupied once completed.

Healthcare facilities: In April 2013, SIGAR reported on USAID's construction of hospitals.⁷² USAID's goal was to expand Afghans' access to healthcare by increasing the number of medical facilities. SIGAR found that USAID could have more effectively used funds if it had coordinated the design of healthcare facilities with the Afghan government. SIGAR noted that because of this lack of coordination, USAID built two hospitals that were more than 12 times larger than their replacements, preventing the Afghan government from affording their operation and maintenance. Additionally, Afghanistan lacked a sufficient number of qualified healthcare professionals, resulting in reduced healthcare services at the USAID-funded facilities.

Humanitarian Relief Sector Oversight

SIGAR issued two performance audits, two evaluations, and one other report examining the \$6.3 billion obligated for humanitarian relief sector programming. These U.S. funds were intended to provide urgent health, nutrition, water, and shelter needs of the Afghan people. Overall, SIGAR found oversight shortfalls that may have reduced the effectiveness of humanitarian assistance, as well as an increased risk of waste, fraud, or abuse. Similarly, SIGAR found that it was difficult to provide humanitarian assistance in Afghanistan without benefiting bad actors, such as the Taliban. Below are examples of SIGAR's reporting on the humanitarian relief sector programming.

Emergency Food Assistance to Afghanistan: In August 2023, SIGAR reported on USAID's oversight of nearly \$900 million in emergency food assistance to feed 18 million Afghans.⁷³ SIGAR found that without that aid, millions of Afghans would have faced more severe food insecurity and even death; however, additional funding was required to fully address the need on the ground. SIGAR also found that the Taliban interfered with food distribution, stealing food supplies, intimidating aid workers, and preventing female employees from working. SIGAR concluded that although USAID provided some oversight of the program, the agency visited only 268 of the more than 3,000 distribution sites, which

prevented USAID from effectively overseeing emergency food assistance distribution, verifying monitoring reports, and providing lessons to inform future decisions.

The UN’s Shipments of U.S. Currency to Afghanistan: In January 2024 and July 2024, SIGAR reported on the UN’s shipment of \$3.8 billion in U.S. currency into Afghanistan to facilitate international donor responses to the humanitarian crisis that followed the Taliban’s August 2021 takeover.⁷⁴ SIGAR, in its January 2024 report stated that following the Taliban takeover, Afghanistan experienced multiple crises, including a liquidity crisis marked by a shortage of domestic currency in circulation. This hindered donors’ ability to cover operating and programming costs for delivering on-the-ground humanitarian assistance. SIGAR described that the UN was the only organization purchasing U.S. currency for use in Afghanistan, and explained the UN’s process for purchasing, transporting, and disbursing U.S. currency in Afghanistan.

SIGAR’s July 2024 report focused on the impact of the UN’s cash shipments on Afghanistan’s economy and humanitarian relief efforts. SIGAR found that the shipments had a positive economic impact, allowed the Taliban-run central bank to implement monetary policies, helped alleviate the negative impacts of Taliban policies, stabilized Afghanistan’s national currency, and lowered the cost of humanitarian relief efforts. However, SIGAR also found that, due to the Afghan economy’s reliance on the cash shipments, their reduction or cessation would reverse economic and humanitarian gains.

Stabilization Sector Oversight

SIGAR published 10 performance audits and 4 other reports examining the \$4.0 billion obligated for stabilization sector programming. These U.S. funds were intended to improve security, extend the Afghan government’s reach to provide services, and facilitate reconstruction in priority provinces in Afghanistan. However, SIGAR found that for many of these projects, U.S. agencies failed to assess the impact of their programs to improve the legitimacy and management capabilities of the Afghan government. The U.S. government also failed to get Afghan government buy-in for these efforts resulting in slow progress, poor management, and wasted funds. Below are examples of SIGAR reports on stabilization sector programming.

DOD’s Commander’s Emergency Response Program: In September 2009, January 2011, and April 2018, SIGAR reported on DOD’s \$2.6 billion CERP, which DOD viewed as a critical tool in conducting counterinsurgency and stability operations. The program implemented small-scale projects aimed at improving economic development, supporting the Afghan government, and undermining the insurgency.⁷⁵ SIGAR found that although DOD had procedures to develop goals and metrics for each small-scale project, the department did not consistently implement them. As a result, DOD could not determine the full extent of the program’s accomplishments or whether it assisted the U.S. government in carrying out its counterinsurgency strategy. SIGAR also found that local communities or governments could not sustain these projects, leading to a waste of U.S. funds.

USAID's Stabilization Efforts: In April 2012, June 2012, and July 2013, SIGAR reported on \$733 million in USAID programming aimed at increasing political, economic, and social stability in Afghanistan.⁷⁶ SIGAR found that stabilization programming was a key building block of the U.S. counter insurgency strategy, and that the programming must succeed in order to achieve short- and long-term military and economic support drawdown goals. However, SIGAR also found that USAID's stabilization programs suffered from multiple challenges including implementation delays, high operating costs, a lack of a withdrawal plan, insufficient program performance measurement, missed targets, and a lack of signed agreements with the Afghan government. SIGAR concluded that local communities and governments did not take responsibility for the projects and were dissatisfied with USAID's programming, potentially jeopardizing their success.

State's Antiterrorism Assistance: In October 2022, SIGAR reported on State's \$95 million program to enhance Afghanistan's ability to deter individuals and groups from engaging in acts of international terrorism.⁷⁷ SIGAR found that State could not provide the required oversight on antiterrorism programming due in part to security issues. As a result, State could not determine whether the program met its targets, achieved strategic antiterrorism goals, or made informed programming decisions. SIGAR concluded that the program undermined its own goals as it transferred up to \$32 million in equipment, including weapons, ammunition, explosives, and vehicles, to the former Afghan government, which is now likely Taliban-controlled.

Economic Growth and Development Sector Oversight

SIGAR issued nine performance audits, one evaluation, and three other reports examining the \$2.4 billion obligated for economic growth and development sector programming. These funds were intended to develop a thriving private sector-led Afghan economy, through improving economic policy and the business environment. SIGAR found that U.S. agencies lacked a coordinated economic development strategy to guide their efforts and failed to garner private investment—a key component of the economic development strategy—due to Afghanistan's physical insecurity and political and economic instability. Below are examples of SIGAR's reports on economic growth and development sector programming.

DOD's Task Force for Business and Stability Operations (TFBSO): In January 2018, SIGAR reported on TFBSO, an organization within DOD whose goal was to reduce violence, enhance stability, and support economic normalcy in Afghanistan through strategic business and economic activities.⁷⁸ SIGAR found that TFBSO was unable to accomplish its overall goals because it lacked a clear mission and strategy—combined with poor coordination, planning, contracting, and oversight—which led to interagency disagreements and waste. SIGAR concluded that TFBSO's goals did not align with its capabilities, and its role within the U.S. reconstruction effort was unclear. While TFBSO hired or contracted with technical experts in agriculture, banking, business development, mining, and energy, it often demonstrated a lack of awareness or understanding about Afghanistan's political, economic, social, and security conditions, which complicated its interventions. SIGAR questioned whether economic development was a proper mission for DOD.

Afghanistan's Extractives Industry: In April 2015 and January 2023, SIGAR reported on U.S. efforts to develop Afghanistan's extractives industry.⁷⁹ Afghanistan's extractives industry presented one of the greatest opportunities for the Afghan government to attract foreign investment, generate royalty income, grow its economy, and provide meaningful employment. However, SIGAR's April 2015 report noted that U.S. efforts lacked an overall strategy and coordination, and that the Afghan government lacked the capacity to effectively manage its extractives industry, putting \$488 million in U.S. funds at risk for waste. Similarly, SIGAR reported in January 2023 that the same issues identified in the 2015 report continued to hinder U.S. efforts to develop Afghanistan's extractives industry. The 2023 report stated that Afghanistan's insecurity, amongst other factors such as a lack of infrastructure, limited foreign investment in the country's extractives industry. SIGAR concluded that Afghanistan's extractives industry never achieved its potential, despite years of U.S. efforts and nearly \$1 billion in funding.

Health Sector Oversight

SIGAR issued 4 performance audits examining the \$2.3 billion in obligations for health sector programming. These funds were intended to improve the general health of the Afghan people, prioritizing the health needs of women and children. SIGAR found improvements in healthcare, but also that U.S. programs struggled to effectively measure their impact, sometimes depending on unreliable data to claim success. After August 2021, much of the health gains, particularly for women and girls, were erased as the Taliban restricted their access to basic healthcare. Below are examples of SIGAR's reports on health sector programming.

U.S. Efforts in Afghanistan's Healthcare Sector: In January 2017 and May 2023, SIGAR reported on the status of U.S. efforts to support Afghanistan's healthcare sector.⁸⁰ SIGAR found improved availability and quality of healthcare in urban and rural areas, and improved capabilities of healthcare staff and patient care. However, SIGAR also found that U.S. agencies lacked reliable data, had incomplete programming assessments, neglected to establish metrics linking U.S. efforts to improvements in health outcomes for Afghans, and conducted poor oversight, making it difficult to determine the effectiveness of U.S. healthcare programming in Afghanistan. SIGAR also found that U.S. agencies' reliance on flawed and inconsistent external health outcome data may have distorted the claimed improvements in health outcomes for Afghans and Afghanistan's healthcare sector.

Education Sector Oversight

SIGAR issued two performance audits, one evaluation, and one other report examining the \$1.7 billion obligated for education sector programming aimed at promoting basic and higher education, literacy, and skills training. Overall, SIGAR found that U.S. efforts to support education in Afghanistan were uncoordinated and did not expand access to education as intended. Student enrollment increased due to U.S. efforts, however that progress was rolled back when the Taliban seized control in 2021, causing educational access and quality in Afghanistan to further deteriorate, especially for girls and women. Below are examples of SIGAR's reports on education sector programming.

U.S. Efforts in Afghanistan's Education Sector: In April 2016 and October 2023, SIGAR reported on the status of Afghanistan's education sector.⁸¹ In April 2016, SIGAR found that U.S. agencies lacked a coordinated education strategy and did not adequately assess their efforts to support education in Afghanistan. In October 2023, SIGAR updated its 2016 report to include the period after the Taliban's takeover of Afghanistan in August 2021. SIGAR found that the Taliban's takeover triggered a decline in the overall access to and quality of education in the country, and that international donors, including the United States, shifted much of their funding and programming efforts toward private schools in Afghanistan. While donor-funded schools intended to expand access to primary-level education in areas with limited public-school facilities or with marginalized populations, their impact was limited in addressing the many issues affecting Afghanistan's weakened education system.

Agriculture Sector Oversight

SIGAR issued one performance audit and three other reports examining the \$866 million obligated for agriculture sector programming. These funds were intended to improve food security and increase agricultural productivity for the Afghan people. SIGAR found that U.S. agencies failed to measure program results and, therefore, could not determine if its funds improved overall food security and increased agribusiness production. SIGAR also found that U.S. agencies did not take into account Afghanistan's ability to sustain improvements to agribusinesses. Below is an example of a SIGAR report on agriculture sector programming.

USAID's Regional Agriculture Development Program: In July 2018, SIGAR reported on USAID's Regional Agriculture Development Program and found USAID could not determine whether the program had made progress toward achieving its goals or agriculture objectives for Afghanistan.⁸² SIGAR also found that USAID and its implementing partner failed to establish and report on programming targets, routinely changed programming targets, inconsistently monitored programming targets, and did not incorporate sustainability into the program's design. SIGAR concluded that because USAID intended to use the program as the cornerstone of its agricultural programming without the knowledge of whether Afghan agribusinesses could sustain the program's activities, the agency could potentially jeopardize U.S. funds.

Program Support Sector Oversight

SIGAR issued two performance audit reports examining the \$1.4 billion in obligations for U.S. programming support. These funds were designed to support the achievement of other U.S. programs' goals and objectives. Below is an example of a SIGAR report on U.S. programming support.

U.S. Agency Management Information Systems: In July 2009, SIGAR reported on U.S. agencies' use and integration of management information systems to track and report on U.S. reconstruction efforts in Afghanistan.⁸³ SIGAR found that while U.S. agencies utilized management information systems for collecting data on their respective agency's reconstruction activities, the United States had no single management information system

to plan, coordinate, monitor, and report on U.S. reconstruction activities in an accurate, timely, and integrated way. SIGAR concluded that without such a system, U.S. officials could not effectively manage U.S. reconstruction efforts, and that implementing a single management information system would provide a complete picture of Afghanistan's operating environment, enhance whole-of-government and agency specific strategies, and provide accountability and transparency of U.S. taxpayer funds.

Oversight of Programming Concerning Women's Rights and Equality

SIGAR issued seven performance audits and two other reports examining the \$252 million obligated for programs concerning women's rights and equality. These funds were intended to ensure a better future for Afghan women and their families by supporting legal rights, improving access to public services and jobs, and encouraging inclusion in public life. Overall, SIGAR found that U.S. efforts to promote women's rights and equality were fragmented, not well coordinated, were not sustainable, and that the United States' largest program did not meet all its programming goals. With the rise of the Taliban government, many reforms and rights achieved through U.S. efforts have been rolled back. Below are examples of SIGAR reports on women's rights and equality programming.

Coordination and Evaluation of U.S. Women's Programming: In July 2010 and December 2014, SIGAR reported on congressional directives for U.S. agencies to support Afghan women.⁸⁴ SIGAR's July 2010 report showed that State and USAID did not coordinate their strategies or reporting on their respective women's rights and equality programming efforts. SIGAR also found State and USAID programming only partially met the congressional directives and did not show linkages to the U.S. government's overall women's rights and equality strategy in Afghanistan. SIGAR's December 2014 report explained that while U.S. agencies took steps to improve intra-agency coordination, responsibility for women's rights and equality programming was still fragmented, and that U.S. agencies had not performed a comprehensive assessment to determine how U.S. efforts had improved the lives of women in Afghanistan.

USAID's Promoting Gender Equity in National Priority Programs: In September 2018, SIGAR reported on USAID's then-largest women's rights and equality program investment (\$216 million) to advance women globally.⁸⁵ SIGAR found that USAID's implementation deviated from the original intent of the program, USAID had not fully assessed the extent to which the program was meeting its overarching goal, and the program was missing its targets. In the report, SIGAR also raised questions about the program's sustainability, which put USAID's \$216 million investment in jeopardy of being wasted.

Oversight of Other Areas of Interest

SIGAR issued 29 performance audits, 8 evaluations, 1 inspection, and 58 other reports examining compliance with laws and regulations. SIGAR found some U.S. funding directly benefited the Taliban and potentially, other terrorist organizations. Below are examples of these reports.

Taxes paid to the Taliban: In May 2024, SIGAR reported on U.S. funds used to pay taxes to the Taliban-controlled government of Afghanistan.⁸⁶ SIGAR found that since the fall of the Afghan government in August 2021, at least \$10.9 million in U.S. funds were used to pay taxes to the Taliban-controlled government on the \$2.8 billion in humanitarian and development assistance delivered to help the people of Afghanistan. While the United States government made exceptions for such types of payments, U.S. agencies inconsistently required its implementing partners to report on taxes paid to the Taliban. Additionally, the agencies were unaware of the millions of dollars in the types of taxes and fees paid to the Taliban. SIGAR concluded that without collecting comprehensive information on taxes and other payments made to Taliban-controlled governing institutions, the U.S. government cannot fully assess the extent to which funding, intended for the Afghan people, was being directed to the Taliban. Without this information, it would be difficult for decision makers to accurately weigh the benefits of humanitarian aid programs against the risks of providing financial benefits to the Taliban.

U.S. Agency Compliance with Anti-Terrorist Financing Laws: In April 2013, July 2013, June 2022, January 2024, and July 2024, SIGAR reported on U.S. agency compliance with laws and regulations requiring agencies to ensure they do not fund or contract with prohibited countries, terrorist groups or with sanctioned organizations, individuals, and entities.⁸⁷ SIGAR found that U.S. agencies had policies and procedures to ensure compliance with such laws and regulations, but did not always adhere to them. Specifically, SIGAR found DOD weaknesses that prevented the department from having reasonable assurance that it identified all contracts held by persons or entities determined to be actively supporting the insurgency and opposing U.S. or coalition forces. SIGAR's June 2022 report documented how 9 years later, DOD had still not implemented all of the recommendations from the April 2013 report, leaving U.S. taxpayer funds vulnerable to U.S. adversaries. Likewise, SIGAR found that USAID's Mission to Afghanistan adhered to USAID's policies and procedures, but USAID's Bureau for Humanitarian Assistance did not vet nongovernmental organizations as required, even as the bureau disbursed nearly \$40 million to those organizations. Additionally, two of five State bureaus could not demonstrate that they complied with agency policies and procedures, which increased the risk that terrorists may have illegally benefited from U.S. taxpayer funds. SIGAR concluded that while the U.S. government continued to provide funding to Afghanistan, it was vital to prevent U.S. funds from benefiting the Taliban or other sanctioned parties.

FINANCIAL AUDIT OVERSIGHT AND REPORTING

The Audits and Inspections Directorate launched its financial audit program in 2012 after a series of performance audit reports identified gaps in U.S. agency compliance with federal requirements to perform financial oversight over programming awards.⁸⁸ Additionally, Congress expressed concerns about similar gaps and the growing backlog of audits for awards supporting Afghanistan's reconstruction. SIGAR's financial audits examined cost-reimbursable awards issued by DOD, State, USAID, and the U.S. Department of Agriculture (USDA).⁸⁹ SIGAR's financial audits did not review fixed-price contracts because costs are negotiated in advance.

Similar to other Audits and Inspections Directorate audits, SIGAR's financial audits were deconflicted with applicable oversight agencies to maximize audit coverage and avoid duplication. However, given limited staffing, SIGAR contracted the performance of financial audits to independent public accounting firms, allowing SIGAR to issue dozens of financial reports annually and maximize its coverage of programming across reconstruction sectors.

Once the independent public accounting firms completed their work, SIGAR reviewed, revised, and approved it to ensure that the financial audits were performed in accordance with U.S. government auditing standards, and then made recommendations to the applicable U.S. agency, as necessary. The audit reports questioned costs charged to U.S.-funded awards that contractors could not provide adequate support for, or that were not in compliance with contract terms or laws and regulations. Based on these results, SIGAR recommended that funding agencies recover any questioned costs determined to be unallowable. SIGAR also recommended that funding agencies address their implementing partners' internal control weaknesses and instances of noncompliance that had either resulted in questioned costs or put U.S. government funds at risk. Additionally, SIGAR's financial audits reported on whether audited implementing partners took adequate corrective action to address prior report findings and recommendations.

From January 1, 2012, through September 20, 2025, SIGAR issued 297 financial audits, examining more than \$10 billion in amounts spent under awards funded by DOD, State, USAID, and USDA. Table 9 shows the number of financial audit reports, total coverage, and the amount of questioned costs for each sector.

TABLE 9

SECTORS COVERED BY SIGAR FINANCIAL AUDIT REPORTS				
Sector	Number of Audits	Audited Amount (in \$ Millions)	Questioned Costs (in \$ Millions)	% Questioned of Audited Amount
Security	44	\$3,224.85	\$269.41	8.35%
Agriculture	25	\$1,287.49	\$39.70	3.08%
Civil Infrastructure	19	\$1,204.67	\$78.75	6.54%
Stabilization	33	\$1,027.86	\$33.40	3.25%
Capacity Building and Governance	39	\$978.28	\$11.80	1.21%
Economic Growth and Development	25	\$630.96	\$30.01	4.76%
Education	27	\$393.60	\$13.15	3.34%
Health	20	\$370.80	\$2.25	0.61%
Program Support	20	\$333.38	\$16.85	5.05%
Counternarcotics	7	\$287.55	\$38.05	13.23%
Humanitarian Relief	20	\$202.22	\$4.39	2.17%
Women's Rights and Equality	12	\$105.74	\$3.32	3.14%
Other	6	\$109.76	\$0.33	0.30%
TOTAL	297	\$10,157.15	\$541.40	5.33%

Note: Of the \$541.4 million in questioned costs, SIGAR financial audits prompted the recovery of more than \$35.0 million in disallowed costs. An additional \$359.678 in questioned costs are being reviewed by funding agencies as of September 20, 2025. The table excludes more than \$15.7 billion in obligations for agency operations because SIGAR's enabling legislation limits its scope of oversight to funding spent for the reconstruction of Afghanistan. SIGAR did not examine funds spent on overall agency operations.

Source: Analysis of SIGAR reports and letters issued from January 1, 2012, through September 20, 2025.

These audits provided assurance that federal funds for Afghanistan reconstruction were properly accounted for and only expended on eligible program activities. Of the more than \$10.0 billion in costs SIGAR reviewed, the agency questioned \$541.4 million. As a result of SIGAR's financial audits, U.S. agencies agreed to recover \$35.0 million (or 7 percent), with an additional \$359,678 in questioned costs under review as of September 20, 2025.

SIGAR found that U.S. agencies allowed costs questioned by SIGAR for four primary reasons: (1) implementing partners provided supporting documentation to U.S. agencies that they did not provide during the audit, (2) services were provided to the government, though the services may not have been at the best price, (3) U.S. agencies determined questions costs complied with the contract terms or regulations, and (4) the costs were approved by the U.S. agency prior to being incurred. If a U.S. agency determined a questioned cost was unallowable, contractors could appeal those determinations without SIGAR's knowledge or involvement. SIGAR's authorizing legislation only provided SIGAR with the authority to identify questioned costs, and not determine their allowability or recovery. Nevertheless, SIGAR rejected some funding agency determinations as incomplete or unfounded, prompted the agencies to reconsider SIGAR's recommendations, or simply closed some recommendations that questioned costs because of the long passage of time and agency inaction. Ultimately, SIGAR financial audits successfully identified hundreds of internal controls deficiencies and compliance problems, and highlighted these issues for funding agency officials.

Financial Audits of the Security Sector

SIGAR issued 44 financial audit reports that examined more than \$3.2 billion in costs for security sector programming and questioned more than \$269.4 million of those costs. An August 2016 report that examined a DOD contract for translation and interpretation management services for U.S. Central Command, found that the implementer could not demonstrate that its hired linguists had successfully passed their counterintelligence and security screening.⁹⁰ This failure to meet contract requirements increased risks to U.S. troops and Afghan National Army personnel. The same audit identified serious issues with the contractor's procurement of goods and services, including awarding subcontracts to entities that were prohibited from receiving federal funding. These results prompted SIGAR to question nearly \$59 million in costs.⁹¹

An audit of a DOD contract, which provided specialized counterinsurgency intelligence experts to mentor and train ANDSF personnel, raised significant concerns about whether the costs claimed by the implementing partner were actually incurred or allowable.⁹² SIGAR found that the implementing partner could not substantiate more than \$134.5 million in expenditures, most of which were paid to a single subcontractor. Consequently, SIGAR determined the contractor was not adhering to its legal responsibility to oversee award costs and called into question if the subcontractor was charging the government for expenses that were not program related.

Alarmed by these findings, the Defense Contract Audit Agency (DCAA) and the U.S. Senate Committee on Homeland Security and Governmental Affairs each independently investigated the contractor and subcontractor and found extensive financial abuses.⁹³ DCAA's investigation found that, among other unallowable costs, the subcontractor spent government funds on luxury cars. It also paid exorbitant salaries, such as assistants being paid an average of \$190,500, and paid "personal assistant" salaries to the spouses of senior company executives. SIGAR issued a July 2017 performance audit report of the program to determine if the contractor and subcontractor successfully performed the tasks required by the contract.⁹⁴ SIGAR found that the contractor misrepresented costs charged to the DOD that the government was not legally responsible to pay. SIGAR also found that the subcontractor had significant deficiencies in its accounting system that should have rendered it ineligible from receiving government contracts.

Financial Audits of the Agriculture Sector

In total, 25 financial audit reports examined nearly \$1.3 billion in costs for agriculture sector programming and questioned nearly \$39.7 million of those costs.

A July 2013 report examining a cash-for-work program questioned more than \$750,000 paid to Afghan recipients.⁹⁵ Specifically, the contractor was required to obtain fingerprints and/or signatures from each Afghan recipient, which acted as a confirmation that the recipient performed the required work and received payment for that work. However, SIGAR found many instances in which the contractor allowed the same fingerprint to be used for multiple Afghan recipients. Although the contractor asserted this was because community leaders received the cash payments on behalf of Afghan recipients, this practice was not in compliance with the terms of the contract and prevented the contracting officer from ensuring Afghan recipients received payment.

Financial Audits of the Civil Infrastructure Sector

In total, 19 financial audit reports examined more than \$1.2 billion in costs for civil infrastructure programming and questioned more than \$78.7 million of those costs.

A February 2014 report examining a project to construct and rehabilitate roads, questioned more than \$14.1 million in costs.⁹⁶ SIGAR found that the contractor billed the U.S. government for work performed after the contract ended, an employee stole more than \$114,000 in cash designated for the program, and billed the contract over \$239,000 in costs incurred from a separate program. Ultimately, the findings cast doubt on whether the contractor had built all-weather gravel roads required by the award. The audit resulted in a fraud referral to SIGAR's Investigations Directorate.

Financial Audits of the Stabilization Sector

In total, 33 financial audit reports examined nearly \$1.03 billion in costs for stabilization sector programming and questioned nearly \$33.4 million of those costs.

A September 2021 report examining a stabilization award, which provided training and equipment to Afghan law enforcement and security organizations to respond to terrorist activities, found numerous administrative issues and identified nearly \$8 million in questioned costs.⁹⁷ For example, the contractor could not demonstrate that the project's consultants met required qualifications and the contractor double charged more than \$600,000 in payroll taxes. A January 2014 report examined a stabilization program intended to address poverty and economic vulnerability to reduce instability and insurgency and identified nearly \$7.3 million in questioned costs.⁹⁸ SIGAR found that the contractor failed to properly monitor program funding, and identified an instance of collusion in which the operations manager and cashier for the cash-for-work program manipulated payment sheets for fictitious laborers. The contractor also failed to report more than \$380,000 in donated and damaged assets to USAID and used program funds to pay for travel visa penalties, gifts, and ceremony expenses.

Financial Audits of the Capacity Building and Governance Sector

In total, 39 financial audit reports examined nearly \$978.3 million in costs for capacity building and governance sector programming and questioned more than \$11.8 million of those costs.

An August 2021 report examining an award that sought to encourage the use of Afghanistan's formal justice system and support the investigation and prosecution of violent crimes questioned nearly \$2.3 million in costs.⁹⁹ SIGAR found that the contractor overcharged the U.S. government more than \$1.1 million and raised substantial concerns about the accuracy of costs charged to the program, including whether the goods and services charged to the award were actually received.

Financial Audits of the Economic Growth and Development Sector

In total, 25 financial audit reports examined nearly \$631 million in costs for economic growth and development sector programming and questioned more than \$30 million of those costs. SIGAR's reports identified a variety of issues and several noted problems with accounting for the salaries of the contractor's employees.

A December 2013 report of a USAID project intended to expand access to credit markets found that employee timesheets were not signed by a supervisor, the employee, or both.¹⁰⁰ In a few instances, SIGAR found that it was not clear whether the employee worked on the project. SIGAR questioned almost \$100,000 in costs and USAID determined that the entire amount billed was improper and sought full recoveries from the contractor.

Financial Audits of the Education Sector

In total, 27 financial audit reports examined nearly \$393.6 million in costs for education sector programming and questioned more than \$13.1 million of those costs.

An August 2024 report examined a State program that provided scholarships to students at an Afghan university. SIGAR found that the university charged U.S.-funded

scholarship students higher tuition rates than students who were self-funded. The audit questioned more than \$1.7 million in scholarship funding.¹⁰¹ A November 2014 report examining television and radio programs designed to promote adult literacy, questioned over \$3.4 million in costs because the contractor was unable to provide support for what those funds were spent on.¹⁰²

Financial Audits of the Health Sector

In total, 20 financial audit reports examined more than \$370 million in costs for health sector programming and questioned more than \$2.2 million of those costs.

A June 2013 report examining a USAID program that provided technical support to the Afghan Ministry of Public Health and addressed national health priorities documented that the contractor charged entertainment expenses to the award.¹⁰³ Specifically, SIGAR found that welcome and farewell parties, as well as holiday celebrations, were charged to the government and recorded as meetings to justify the costs.

Financial Audits of the Program Support Sector

In total, 20 financial audit reports examined more than \$333 million in costs for program support sector programming and questioned nearly \$16.9 million of those costs.

A July 2013 report examining a program, which provided human resources and logistical support to USAID programs throughout Afghanistan, identified numerous issues with the contractor's procurement of goods and services.¹⁰⁴ For example, SIGAR found that the contractor paid subcontractors nearly \$1.5 million before entering into a formal contract and entered into subcontracts without verifying whether the vendors were suspended or debarred from U.S. government contracting. As a result, SIGAR concluded that the contractor risked using U.S. government funds for purchases that may have been unnecessary or unreasonable, while also entering into relationships with vendors who may have been prohibited from U.S. government funding.

Financial Audits of the Counternarcotics Sector

In total, seven financial audit reports examined more than \$287.5 million in costs for counternarcotics programming and questioned nearly \$38.1 million of those costs.

A September 2020 report that reviewed costs incurred to develop and sustain Afghanistan's drug treatment centers identified that nearly a quarter of all costs paid were unreasonable, unnecessary, or prohibited by U.S. laws, regulations and the terms of the awards.¹⁰⁵ Among other expenses, SIGAR found that the contractor overcharged more than \$2.1 million for administrative costs and did not return nearly \$7.2 million in unspent funding.

Financial Audits of the Humanitarian Relief Sector

In total, 20 financial audit reports examined more than \$202.2 million in costs for humanitarian sector programming and questioned nearly \$4.4 million of those costs.

Most SIGAR audits of humanitarian relief awards were issued after the Taliban's August 2021 takeover of Afghanistan. In a September 2023 report examining a grant to support disaster-affected and returnee populations in Afghanistan, SIGAR found that the contractor failed to ensure cash payments to purchase food were received by intended recipients, and that payments were not made to ineligible vendors.¹⁰⁶ SIGAR also found that the contractor overcharged the U.S. government for employee salaries because it paid staff higher than allowable rates.

Financial Audits of Programming Related to Women's Rights and Equality

In total, 12 financial audit reports examined more than \$105.7 million in costs for women's rights and equality sector programming and questioned more than \$3.3 million of those costs.

An October 2015 report examining a program intended to promote and protect Afghan women's rights and reduce violence against women and girls, questioned nearly \$1.1 million in costs.¹⁰⁷ Specifically, the contractor charged the U.S. government for its executive director's income taxes, including fines and tax penalties, and violated U.S. sanctions by using program funds to purchase materials from a prohibited source in Iran.

Financial Audits of Other Sectors

In total, six financial audit reports examined nearly \$109.8 million in costs for other sector programming and questioned more than \$328,000 of those costs.

A November 2014 report examining a USAID program, which aimed to develop independent and accurate news media in Afghanistan, revealed that the contractor overcharged the U.S. government and billed for costs incurred prior to the award without authorization or justification.¹⁰⁸ Specifically, SIGAR found that the contractor overbilled for consultant and personnel costs, and charged rental equipment costs and internet fees to the program that were incurred prior to the beginning of the agreement.

THE AUDITS AND INSPECTIONS DIRECTORATE GENERATED \$2.5 BILLION IN COST SAVINGS

Work completed by the Audit & Inspection Directorate resulted in cost savings of \$2.5 billion to the U.S. taxpayer. Specifically, SIGAR made recommendations that, when implemented, would allow respective U.S. agencies to use their funding more efficiently, including by reducing spending, deobligating funds, preventing costs from being incurred, or other cost savings. Below are six examples of SIGAR's work that generated over \$1.4 billion of the \$2.5 billion in cost savings to the U.S. taxpayer.

1. Stopped \$600 million From Being Spent on Unneeded Infrastructure:

In September 2013, SIGAR reported on DOD's construction of 400 facilities for Afghanistan's security forces, valued at \$4.7 billion.¹⁰⁹ SIGAR concluded that many facilities were not needed because DOD had intended to build permanent structures for a temporary force surge and existing facilities were underutilized. SIGAR recommended that DOD defer building permanent facilities, as appropriate,

to eliminate future excess capacity. As a result of our report, DOD did not build the unnecessary facilities, which were valued at \$600 million, and instead put those funds to a better use.

2. **Stopped \$463 million From Being Spent on Unneeded UH-60 “Black Hawk” Helicopters:** In January 2019, SIGAR reported on DOD’s efforts to modernize Afghanistan’s Air Force by purchasing 159 UH-60 “Black Hawk” helicopters. At the time, the estimated cost of procuring and sustaining the Black Hawk helicopters, and training the crews to fly and maintain them, varied from \$5.8 billion to approximately \$7.0 billion in FY 2017 through FY 2023.¹¹⁰ SIGAR concluded that the Afghan Air Force would not be able to operate all 159 helicopters and recommended DOD consider whether it needed to purchase the intended number of helicopters. In September 2019, the Senate Appropriations Subcommittee on Defense recommended a reduction of \$463.3 million for the ASFF Black Hawk helicopter procurement for FY 2020, and directed the Secretary of Defense to suspend Black Hawk helicopter procurements in FY 2020. This resulted in DOD reducing its order of Black Hawk helicopters from 159 to 53. The reduction resulted in over \$463 million in savings for a single year. Additionally, these procurement reductions had additional, unquantified, savings due to reduced sustainment costs.
3. **Stopped \$190 Million From Being Spent on Commander’s Emergency Response Programs:** In September 2009, SIGAR reported on DOD’s CERP and its internal controls to ensure accountability of programming funds.¹¹¹ SIGAR found that the program lacked internal controls, and that DOD needed to improve its program management and oversight. SIGAR recommended that DOD develop and implement a plan to address how to manage and oversee the increased risks associated with large-scale projects and address the capabilities of the program’s implementing units. As a result of the report, DOD instituted new orders limiting the number and monetary value of projects, resulting in \$190 million of funds put to better use.
4. **Stopped \$94 Million in Unnecessary Fuel Purchases:** In October 2013, SIGAR reported on DOD’s fuel purchasing for Afghanistan’s police forces.¹¹² SIGAR found that DOD was using past fuel purchase amounts to determine future fuel purchases instead of using past fuel consumption data. The report analyzed past DOD data and determined that DOD requested \$94 million more in fuel purchases than necessary for FY 2013. As a result, DOD reduced its fuel purchase orders and put those funds to better use.
5. **Stopped \$40 Million From Being Spent on Unneeded C-130 Aircraft:** In July 2014, SIGAR reported its concerns about DOD’s intent to purchase two additional C-130 cargo planes for the Afghan Air Force, bringing their total number of airframes to four.¹¹³ SIGAR found that the Afghan Air Force was underutilizing the two C-130 cargo planes in its fleet, and that the purchase of two additional planes was unneeded. In October 2014, SIGAR reported that due to the July 2014 report, DOD reevaluated its plan to purchase two additional C-130 cargo planes and subsequently determined that it only needed to purchase one plane due to mission readiness requirements. DOD canceled the purchase of the second plane, saving U.S. taxpayers \$40 million in aircraft, maintenance, and training costs.¹¹⁴

6. **\$35 Million in Cost Recoveries from SIGAR Financial Audits:** As a result of SIGAR's financial audits questioning costs contractors spent on U.S.-funded programming, U.S. agencies agreed to recover \$35 million in disallowed costs.

SIGAR IDENTIFIED MORE THAN 1,900 INTERNAL CONTROL WEAKNESSES, WHICH INCREASED THE RISK OF WASTING U.S. TAXPAYER FUNDS

SIGAR's 149 performance audits and 16 evaluation reports identified 1,911 internal control weaknesses that were the primary causes of the waste, potential fraud, and abuse identified in Chapter 3. This section explains the internal control weaknesses within U.S. agencies that led to that waste, fraud, and abuse. This section also highlights how SIGAR sought to rectify those weaknesses and how SIGAR's work prevented additional waste and put U.S. funds to more productive uses.

Internal Controls and Their Importance

Waste, fraud, and abuse often occur due to failures in program design, implementation, or oversight. These failures are known as "internal control weaknesses." The U.S. Government Accountability Office (GAO) defines an internal control as "...a process effected by an entity's oversight body, management, and other personnel that provides reasonable assurance that the objectives of an entity will be achieved."¹¹⁵ Internal controls are comprised of "...the plans, methods, policies, and procedures used to fulfill the mission, strategic plan, goals, and objectives of the entity. Internal control serves as the first line of defense in safeguarding assets."¹¹⁶ Effective internal controls help organizations and their programs adapt to shifting environments, evolving demands, changing risks, and new priorities, and provide assurances that the organization's objectives will be achieved. A deficiency in an internal control exists when the design, implementation, or operation of the internal control prevents the organization from achieving its objectives and addressing the associated risks.

SIGAR's performance audit reports examined U.S. reconstruction efforts and identified when U.S. agencies or their programs did not achieve their objectives or sufficiently addressed relevant risks. These programmatic failures were described in SIGAR's reports along with the cause of failure, known as an "internal control deficiency." For this report, SIGAR categorized those internal control deficiencies by common themes. Table 10 on the next page lists the six categories of internal control deficiencies and their respective definitions.

SIGAR Identified 1,911 Instances of Internal Control Weaknesses

The 1,911 instances of internal control weaknesses are divided into six categories: Planning/Contracting, Oversight/Monitoring, Capacity Building, Mismanagement, Information Quality and Data Reliability, and Judicious Spending of Funds. Figure 8 on page 53 shows the total number of internal control weaknesses broken down into the six categories.

SIGAR also analyzed internal control weaknesses by agency. Specifically, SIGAR reports examining DOD programs identified 796 internal control weaknesses

TABLE 10

CATEGORIES OF INTERNAL CONTROL WEAKNESS AND THEIR DEFINITIONS	
Planning / Contracting	Programs that did not meet the needs of Afghans, were redundant, were not properly planned, or were not coordinated with other entities to ensure that they are part of larger overall U.S. government objectives. This category also includes instances in which a project requires maintenance but no budget exists, or where a project was executed without consideration for the Afghan recipients' ability to maintain or sustain it.
Oversight / Monitoring	Instances in which quality control or oversight were not present or were insufficient, specifically, as it relates to contract oversight. This category includes factors that prevent program officials from overseeing program progress and execution, such as security concerns.
Capacity Building	Instances in which actions or lack of actions hampered the capacity and ability of an organization to achieve its stated goals and objectives. For example, training staff unsatisfactorily or providing institutional support, such as equipment and supplies, that did not work.
Mismanagement	Instances in which lacking managerial controls or failing to plan threatened program success. This category includes issues such as ill-informed managerial decisions, not establishing performance metrics or other performance data, insufficient document retention, or quality concerns with program data collected.
Information Quality and Data Reliability	Instances in which a lack of appropriate, current, complete, accurate, accessible, and timely information threatened an organization's ability to achieve its objectives. For example, management did not obtain relevant data from reliable internal and external sources in a timely manner based on identified requirements.
Judicious Spending of Funds	Funds spent extravagantly or carelessly, such as instances in which program officials did not provide justification for a noncompetitive bidding process or for not selecting the best value, in accordance with federal acquisition regulations. This category includes programs producing no tangible results.

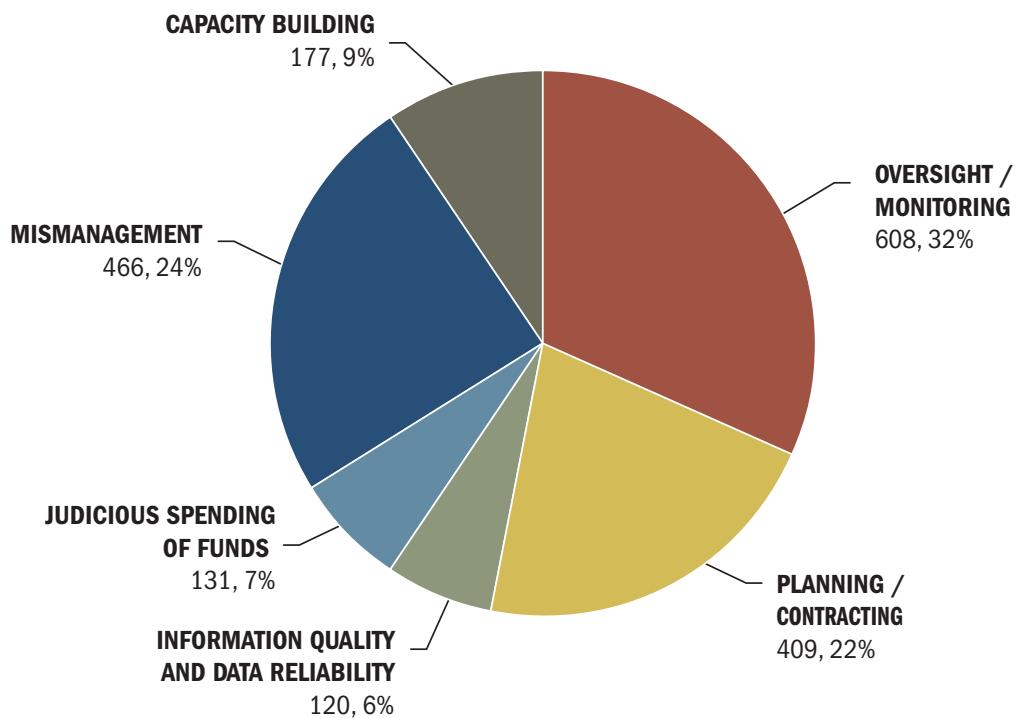
Source: SIGAR analysis.

(42 percent), reports examining multiple agencies included 757 internal control weaknesses (40 percent), reports examining USAID programs found 196 internal control weaknesses (10 percent), reports examining State programs identified 94 internal control weaknesses (5 percent), and reports examining other U.S. agency programs identified 68 internal control weaknesses (4 percent).¹¹⁷ Figure 9 on page 54 shows the total number of internal control weaknesses by agency level, broken down by the six categories. Figure 10 on page 55 presents the same information in a different format: the total number of internal control weaknesses by category, broken down by each agency.

SIGAR reports identified recurring internal control weaknesses within U.S. agencies operating in the same sector or engaging in similar activities in Afghanistan over the last 15 years. For example, SIGAR had multiple reports, spanning 11 years, that examined DOD's payroll processes for Afghan military personnel. SIGAR found a lack of oversight resulting in systemic internal control weaknesses, poor planning and contracting practices, and the injudicious spending of funds. SIGAR's four reports on salary payments for ANDSF personnel noted that DOD paid over \$3 billion to the Afghan government for ANDSF personnel salaries and determined the payments included salaries for nonexistent ANDSF personnel, known as "ghost soldiers." SIGAR's assessments showed that DOD continued to disregard recommendations to implement appropriate and effective internal controls and management of payroll processes to accurately calculate salary payments. Internal control weaknesses resulted in DOD overpaying more than \$500 million in U.S. taxpayer funds to the Afghan government; however, the actual amount was likely higher.¹¹⁸

Likewise, State and USAID had similar systemic internal control weaknesses related to payroll for Afghan government employees. SIGAR's October 2010 report noted that multiple internal control weaknesses led to the U.S. government overpaying the salaries of Afghan government officials and making payments to nonexistent employees, and made 10 recommendations to protect U.S. taxpayer money.¹¹⁹ Seven years later, SIGAR determined in its July 2017 report that State and USAID had not implemented all of SIGAR's previous recommendations. As a result, State and USAID were still making salary payments for Afghan government employees without establishing SIGAR's recommended safeguards to protect U.S. taxpayer funds.¹²⁰

FIGURE 8
INTERNAL CONTROL WEAKNESSES, BY CATEGORY



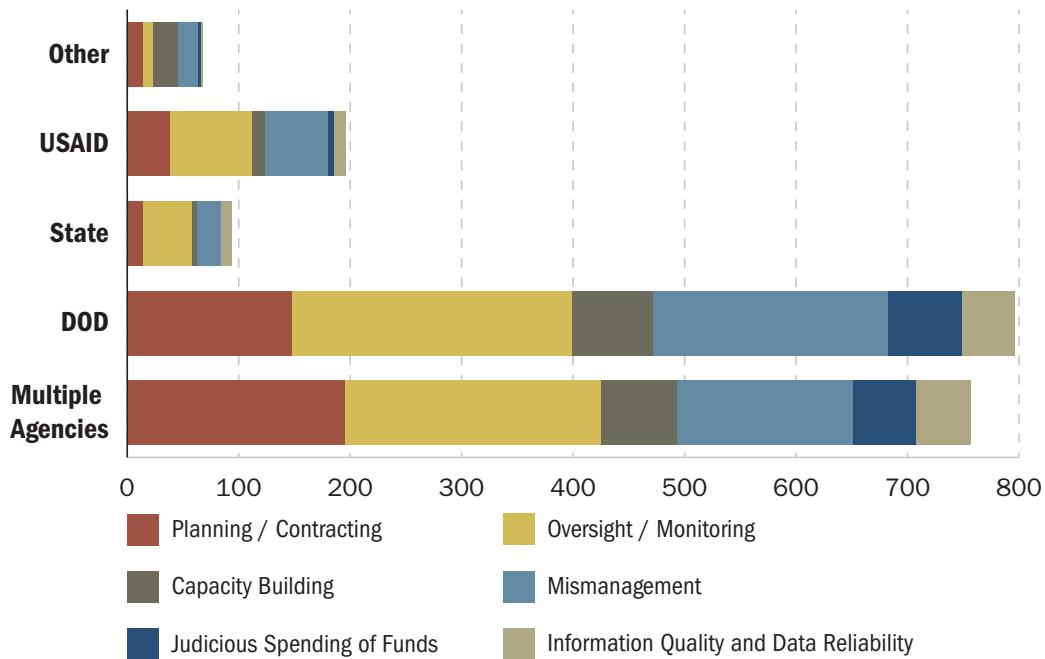
Source: SIGAR analysis.

SUMMARY OF SIGAR REPORT RECOMMENDATIONS AND THEIR STATUS

SIGAR's oversight mission included providing recommendations to promote economy, efficiency, and effectiveness.¹²¹ Additionally, SIGAR was required to keep "the Secretary of State and the Secretary of Defense fully and currently informed about problems and deficiencies relating to the administration of such [reconstruction] programs and operations and the necessity for and progress on corrective action," as well as keep Congress informed through reports every 90 days.¹²²

FIGURE 9

TOTAL NUMBER OF INTERNAL CONTROL WEAKNESSES, BY AGENCY AND CATEGORY



Source: SIGAR analysis.

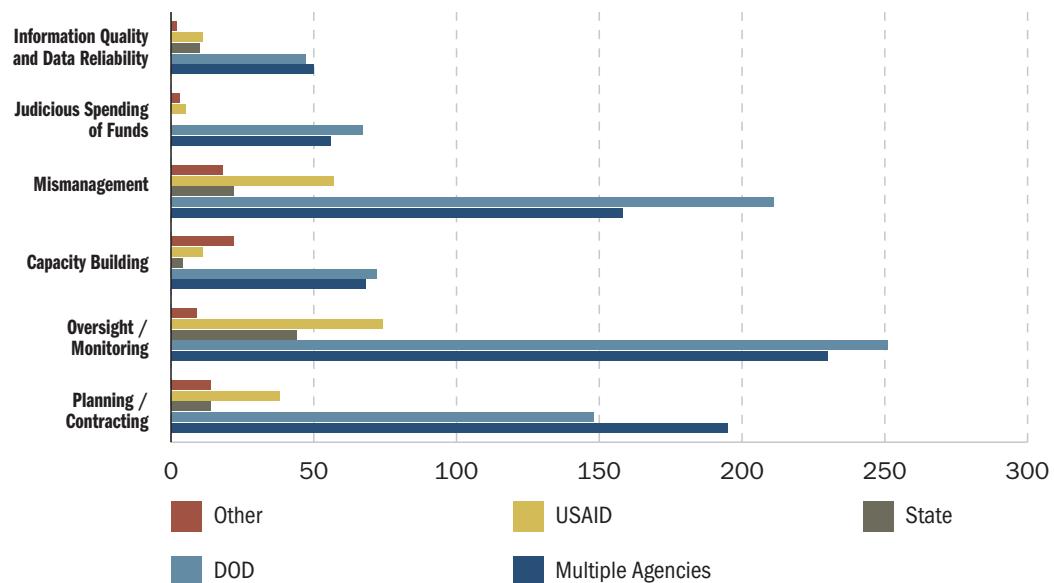
Historically, SIGAR fulfilled these reporting requirements through its *Quarterly Report to the United States Congress*, which included a description of recommendations for corrective action SIGAR made during the reporting period and a list of each recommendation SIGAR made during previous reporting periods for which U.S. agencies did not take corrective actions. However, because SIGAR determined that additional reporting would allow the agency to provide more in-depth analyses and better inform Congress on the status of the agency's recommendations, in 2014 and 2015, SIGAR reported on the status of SIGAR recommendations as implemented by DOD, State, and USAID.¹²³ In 2020 and 2021, SIGAR provided updates to those reports while also assessing DOD, State, and USAID's recommendation tracking and follow-up processes used to resolve SIGAR recommendations.¹²⁴ This section serves as a final update and provides the status of SIGAR recommendations as of September 20, 2025.¹²⁵

SIGAR grouped its recommendations to U.S. agencies into five categories:

1. **Infrastructure Compliance and Safety:** Recommendations that direct U.S. agencies to improve infrastructure by complying with contract requirements or safety best practices. This category primarily comprises recommendations from SIGAR's inspection reports.
2. **Contract Oversight:** Recommendations that direct U.S. agencies to provide oversight of contracts that it manages. This category primarily comprises recommendations from financial audits.

FIGURE 10

TOTAL NUMBER OF INTERNAL CONTROL WEAKNESSES, BY CATEGORY AND AGENCY



Source: SIGAR analysis.

3. **Improving Program Effectiveness:** Recommendations that direct U.S. agencies to take actions that will improve a program's effectiveness. This category primarily comprises recommendations from performance audits.
4. **Monitoring, Evaluation, and Lessons Learned:** Recommendations that direct U.S. agencies to monitor or evaluate a program's performance, or to produce lessons learned reports for completed programs. This category primarily comprises recommendations from performance audits.
5. **Regulation Compliance:** Recommendations that call for U.S. agencies to comply with U.S. laws or agency regulations, policies, or procedures. This category primarily comprises recommendations from performance audits.

SIGAR tracked the recommendations it made and (1) recorded whether the respective U.S. agency responded to SIGAR's recommendations, and if so, whether the U.S. agency provided the documentation to support its actions; (2) determined the status of each SIGAR recommendation; and (3) documented any costs savings or recoveries that resulted from each SIGAR recommendation. SIGAR personnel who conducted recommendation follow-up, coordinated with the SIGAR team who made the recommendation to determine whether the respective U.S. agency provided sufficient relevant information to resolve the recommendation. If the documentation was insufficient or did not meet the intent of a recommendation, it remained open. This process continued until SIGAR received sufficient documentation to close the recommendation. For recommendations U.S. agencies had not resolved within two years, SIGAR notified the respective U.S. agency that SIGAR would close the recommendation as unimplemented unless it could resolve the recommendation within 90 days.

SIGAR Made Nearly 1,500 Recommendations to U.S. Agencies

SIGAR made nearly 1,500 recommendations in performance, evaluation, inspection, and financial reports. As of September 20, 2025, U.S. agencies had implemented 1,085 (73 percent) of SIGAR's recommendations, leading to enhanced program outcomes, increased mission effectiveness, and at-risk U.S. taxpayer funds put to better use or at reduced risk of falling victim to waste, fraud, or abuse.¹²⁶ DOD implemented 321 out of 543 SIGAR recommendations (59 percent); State implemented 263 out of 354 SIGAR recommendations (74 percent); and USAID implemented 494 out of 577 SIGAR recommendations (86 percent). As of September 20, 2025, five of SIGAR's recommendations remained open, all of which were associated with financial audits. These five recommendations were transferred to the Office of Inspector General for the relevant U.S. agency.

U.S. Agencies' Were Slow to Implement SIGAR Recommendations

As part of SIGAR's 2020 follow-up reports, SIGAR examined U.S. agencies' compliance with U.S. Office of Management and Budget (OMB) and other federal regulations that required them to track the status of audit recommendations and any corrective actions taken in response within 12 months of the recommendations being made. SIGAR's reports found that DOD and State were not fully compliant with these regulations, despite corrective action being essential to improving the effectiveness and efficiency of government operations and for reducing waste, fraud, and abuse.

DOD: SIGAR determined in its April 2020 follow-on report that DOD was not complying with the required OMB and other federal regulations regarding audit recommendations. Of the open recommendations SIGAR examined, 80 percent were older than 12 months, and on average had been open for 20 months. Of the closed recommendations the report examined, DOD implemented only 57 percent within 12 months. On average, DOD took 30 months to close these recommendations. SIGAR also found that DOD did not designate a top-level audit follow-up official to respond to SIGAR recommendations, as required by OMB, despite doing so for DOD OIG and GAO recommendations.

State: SIGAR determined in its October 2020 follow-on report that State was not complying with required OMB and other federal regulations regarding recommendations. Of the open recommendations the report examined, 39 percent were older than 12 months. Of the closed recommendations, State implemented 76 percent within 12 months; however, State took, on average, 28 months to close the other 24 percent of closed recommendations. SIGAR also found that while State had designated a top-level audit follow-up official to respond to SIGAR recommendations, State was not storing recommendation closure supporting documentation, as required.

THE AUDITS AND INSPECTIONS DIRECTORATE FACED FOUR RECURRING CHALLENGES IN PERFORMING OVERSIGHT OF RECONSTRUCTION EFFORTS

Over 17 years, the Audits and Inspections Directorate faced many challenges to effectively conducting oversight of U.S. assistance programs in Afghanistan. While many of these were unique, there were four major challenges conducting oversight that repeated across assistance efforts and timeframes. These were (1) a lack of agency cooperation, (2) poor record retention by U.S. agencies, (3) difficulty physically accessing programming sites in Afghanistan, and (4) frequent staff turnover at U.S. agencies implementing reconstruction efforts. Each of these challenges impacted the timeliness of work and often required SIGAR to develop novel solutions, but did not prevent the agency from carrying out its oversight mandate.

Challenge One: Lack of U.S. Agency Cooperation

The primary challenge SIGAR faced was lack of cooperation from U.S. agencies whose efforts SIGAR was examining. Since SIGAR's inception, U.S. agencies and their officials did not always cooperate in good faith with the agency's oversight responsibilities, leading to delays and difficulties in obtaining timely and complete information.

The lack of cooperation took many forms, including deliberately slow responses to requests for information, providing incomplete responses, restricting access to U.S. agency officials with pertinent information, restricting access to information deemed sensitive or classified despite SIGAR staff holding adequate clearance designations, and challenging SIGAR's legal authority to carry out its oversight activities. These actions had the consequence of making SIGAR's reports less informative and timely, and in turn, less valuable to Congress and the U.S. taxpayer in ensuring the efficacy of U.S. reconstruction efforts and in preventing waste, fraud, and abuse.

Challenge Two: U.S. Agencies' Poor Record Retention

The second challenge SIGAR faced was the failure of U.S. agencies to retain required contract and programming documentation. From the outset, the directorate reported on U.S. agencies' poor record retention and made recommendations to ensure compliance with federal laws and agency requirements for record retention. SIGAR found that U.S. agencies often had difficulty locating records, improperly destroyed records, or did not retain required records on multiple occasions, especially at the beginning of U.S. reconstruction efforts when paper records were kept rather than in digital formats. However, digital records storage was not foolproof, as many agency records were lost or destroyed following the evacuation of the U.S. embassy in August 2021. Similarly, SIGAR found that contractors did not always create or retain required documentation. As a consequence of this poor record management, SIGAR could not fully evaluate the performance of every U.S. reconstruction program and its reports took longer to complete, resulting in less timely information.

Challenge Three: Difficulties Physically Accessing Programming Sites

Due to Afghanistan's operating environment and security demands, SIGAR had difficulty physically accessing some programming sites. Prior to 2013, SIGAR had a greater

ability to travel within Afghanistan to conduct programming site visits and inspections. However, due to Afghanistan's deteriorating security environment, including bombings of local establishments and attacks on U.S. government personnel, SIGAR staff faced increasing travel restrictions around Afghanistan beginning in 2013. In July 2014, SIGAR began reporting on how security concerns and travel restrictions began to affect its ability to perform oversight.¹²⁷ As time progressed, traveling within Afghanistan became even more difficult, especially when the United States began transitioning security responsibilities to the Afghan government and reducing its military presence. In March 2020, all in-country travel ceased because of the COVID-19 pandemic, and in August 2021, all SIGAR staff left Afghanistan due to the collapse of the Afghan government and the evacuation of the U.S. embassy in Kabul.

Challenge Four: Frequent Staff Turnover at Implementing Agencies

Frequent staff turnover at DOD, State, and USAID made SIGAR's work more difficult. At a January 2020 hearing of the U.S. House Committee on Foreign Affairs, SIGAR testimony described this challenge: "...in Afghanistan, most military, embassy, and civilian personnel rotate out of country after a year or less. This means that new people are constantly arriving, all with the best of intentions, but with little or no knowledge of what their predecessors were doing, the problems they faced, or what worked and what didn't work."¹²⁸ DOD in-country officials turned over every six to nine months, and State and USAID in-country officials typically turned over every 12 months. This rotation schedule meant U.S. officials implementing multiyear reconstruction programs lacked knowledge of historical challenges. This was compounded by U.S. agencies lacking an effective transfer process to preserve historical knowledge and ensure a smooth transition, as well as the lack of record retention described above.



U.S. Marine Corps Lt. Col. William McCollough, second from right, commander of the 1st Battalion, 5th Marine Regiment, talks with members of the USAID team at Patrol Base Jaker in Nawa District, Helmand Province, on August 16, 2009. (DOD photo by S. Sgt. William Greeson, U.S. Marine Corps)

CONCLUSION

SIGAR's Audits and Inspections Directorate provided extensive oversight of U.S. reconstruction efforts in Afghanistan, issuing nearly 800 performance audit, evaluation, financial audit, inspection, and other reports examining each reconstruction sector and U.S. agency compliance with federal laws and agency policies. SIGAR also answered congressional requests. Key to its success was SIGAR's status as an independent special inspector general answerable directly to Congress. SIGAR's independent mandate meant that the agency could freely examine reconstruction efforts with a "whole of government" approach and provide Congress with visibility on the progress and challenges the United States faced in Afghanistan that other agency-specific inspectors general could not provide. For example, SIGAR was able to examine U.S. efforts to build Afghanistan's judiciary, which encompassed joint and separate programming by State, USAID, DOD, and DOJ, oversight beyond the abilities of any one agency's inspector general.¹²⁹ This allowed SIGAR to discover and report on significant deficiencies in U.S. programming that might have been missed by a traditional inspector general structure. Similarly, SIGAR's independent authority also meant the agency was not beholden to any U.S. agency, competing interests within an agency, or agency funding and staffing limitations. This allowed SIGAR to report unvarnished facts, without needing the approval of an agency's leadership prior to issuance.

While poor agency cooperation, record retention, and agency turnover repeatedly hampered SIGAR's oversight efforts, SIGAR was able to adapt to changing circumstances and develop novel solutions that allowed access to the information needed to conduct timely, effective, and impactful oversight. SIGAR's reports generated \$2.5 billion in cost savings to the U.S. taxpayer, identified over 1,300 instances of waste, fraud, and abuse totaling between \$26.0 and \$29.2 billion, identified over 1,900 internal control weaknesses that may have contributed to waste, and made nearly 1,500 recommendations to U.S. agencies.



CHAPTER 5

INVESTIGATING THE THEFT OF U.S. TAXPAYER DOLLARS

When Congress created SIGAR, it did so in part to “provide for the independent and objective conduct and supervision of...investigations relating to the programs and operations funded with amounts appropriated or otherwise made available for the reconstruction of Afghanistan.”¹³⁰ Specifically, SIGAR was expected to investigate “overpayments” and “any potential unethical or illegal actions of Federal employees, contractors, or affiliated entities,” and report the results “to the Department of Justice to ensure further investigations, prosecutions, recovery of further funds, or other remedies.”¹³¹ Congress anticipated vigorous, effective criminal investigations of wrongdoing related to Afghanistan reconstruction.

In accordance with its authorizing statute, SIGAR created the Investigations Directorate to plan, initiate, and carry out investigations leading to criminal prosecutions and companion civil actions, such as recovery of funds lost through waste, fraud, and abuse. The directorate was led by an assistant inspector general based at SIGAR headquarters in Arlington, VA.

The directorate recruited a cadre of experienced professionals to carry out its mission. These included criminal investigators (agents), analysts, management support specialists, attorneys who handled suspension and debarment actions, and attorneys who served as Special Inspector General Prosecutors (SIGPRO).¹³² The directorate also

An Afghan money changer counts U.S. dollars at the currency exchange Sarayee Shahzada market in Kabul on December 17, 2015. (AFP photo by Wakil Kohsar)

hired local Afghans, known as foreign service nationals (FSN), who participated in investigations under the direction and supervision of SIGAR agents.

At its peak in 2014, the directorate employed 61 people, split between SIGAR headquarters and various locations in Afghanistan, including Kabul, Bagram and Kandahar Airfields, Camp Leatherneck, Herat, and Mazar-e Sharif.¹³³ By 2019, consistent with a broader U.S. military and civilian drawdown in Afghanistan, only six Investigations personnel remained in-country. Following the collapse of the Afghan government in August 2021, the directorate comprised 31 people, most of whom were based at SIGAR headquarters in Virginia.¹³⁴

SIGAR’S INVESTIGATIONS RESULTED IN 171 CRIMINAL CONVICTIONS AND \$1.67 BILLION IN RECOVERED FUNDS AND SAVINGS TO THE U.S. GOVERNMENT

The vast scale of U.S. assistance to Afghanistan created an environment where reconstruction theft was both extensive and varied. SIGAR investigated cases involving contract fraud, collusion, bribery, bid rigging, and conspiracy to defraud the U.S. government, among others.

Those cases resulted in criminal accountability for at least some of the perpetrators and their accomplices, as well as forfeiture of some of the proceeds of their illegal activity, recovery of the loss of reconstruction funds in some instances, remediation, and, uniquely, suspension and debarment of some of those responsible. The repeated use of the word “some” is purposeful: investigating waste, fraud, and abuse in Afghanistan, especially during an active military conflict, came with enormous challenges. As a practical matter, it was often not possible to prosecute criminals in the United States or in Afghanistan, even when convincing evidence of crime was uncovered.

Despite these and other obstacles, SIGAR’s criminal investigations helped convict 171 defendants in the United States and Afghanistan, and generated \$1.7 billion in criminal fines, asset forfeitures, civil settlements, recoveries and savings to the U.S. government. SIGAR also referred 1,076 individuals and companies to appropriate authorities for suspension and debarment. In some cases, lives may have been saved. For example, the discovery of defective work on culvert grates prevented a repeat of what led to the deaths of two U.S. soldiers, an action we discuss at the end of this chapter.

SEVERAL FACTORS PRESENTED CHALLENGES TO SIGAR INVESTIGATIONS AND PROSECUTIONS

Successfully conducting investigations and prosecutions in Afghanistan was difficult. SIGAR faced challenges due to four factors:

1. The Afghan government’s reluctance to prosecute corrupt Afghan contractors and public officials.
2. Problems obtaining evidence from inadequate and uncooperative sources.

3. Issues with U.S. interagency coordination and cooperation.
4. The lack of a single contracting database.

Afghan Government Reluctance to Prosecute Corrupt Afghan Contractors and Public Officials Often Prevented Convictions and Asset Recoveries

As a U.S. law enforcement agency, SIGAR had no legal authority to prosecute Afghans in Afghan courts and therefore conducted investigations in cooperation with the Afghan Attorney General's Office. However, during the course of its work, SIGAR found that for investigations involving corrupt Afghan contractors and public officials, Afghan prosecutors simply declined to prosecute or were prevented by their superiors from taking a case or pursuing recovery of criminal proceeds.¹³⁵ If Afghan prosecutors came too close to exposing wrongdoers in power (or their friends or associates), they were removed from their positions or otherwise faced personal and professional repercussions.¹³⁶ Afghan prosecutors were often reluctant to investigate or bring a criminal case independently if they believed it might jeopardize their or their family's safety, or their personal or professional interests.

Although Afghan law allowed for the confiscation of criminal proceeds in some cases, the reluctance of Afghan prosecutors to exercise this authority required SIGAR to pursue forfeiture actions outside of Afghanistan, targeting defendants and assets located in the United States or any other jurisdiction where it was feasible.¹³⁷ Afghanistan's constitution and Afghan law also allowed for extradition and mutual legal assistance in limited circumstances, but neither worked in practice.¹³⁸ Because the United States would not extradite U.S. nationals to Afghanistan, Afghanistan was reluctant to extradite Afghans to the United States for prosecution.¹³⁹

Given the costs, security concerns, and reluctance of Afghan authorities to permit travel for witnesses who might testify against well-connected Afghans, it was difficult to provide evidence for U.S. legal action against Afghans. Even if Afghan witnesses could travel, they were understandably hesitant to testify, fearing their cooperation could endanger themselves or their families. The difficulty in authenticating Afghan documents without in-person testimony effectively prevented the use of such evidence in U.S. courts. Consequently, U.S. prosecutors were less inclined to prosecute Afghans even when they were located in the United States and were rarely willing to use U.S. civil forfeiture laws to recover reconstruction funds lost to fraud.

Initially, SIGAR pursued criminal cases involving the most significant amounts of money and key perpetrators, whether they were Afghan or not, with some success. However, SIGAR shifted to building cases against people who could be found and prosecuted in the United States when it became increasingly apparent that Afghan officials were unwilling or unable to prosecute criminal cases against well-connected Afghans, and that Afghan nationals were unlikely to be prosecuted in the United States. SIGAR also intensified efforts to pursue cases with the potential to prevent or mitigate financial loss, producing, among other things, evidence for suspension and debarment, and for recovering money through civil forfeiture actions that did not require a criminal conviction.

Usable Evidence from Afghan Sources Proved Difficult to Obtain

Because SIGAR agents could not move freely within Afghanistan to visit crime scenes, collect evidence, or meet witnesses, SIGAR often asked potential sources to come to the U.S. Embassy Kabul for interviews. The embassy required visitors to disclose their names and the purpose of their visit before entry, which caused legitimate concerns for Afghans who feared being branded as informants if seen entering. Some were also turned away for refusing to surrender their phones before passing through the gate. The fear of revealing their identity or being spotted by hostile observers deterred many Afghans from coming to military sites or offsite locations to meet SIGAR agents.

These concerns hindered SIGAR's ability to initiate investigations when leads originated from Afghans or through SIGAR's Hotline. Since this type of information was often based on tips, innuendo, rumor, or gossip, it needed verification before being acted upon. Travel restrictions within Afghanistan, language barriers, distrust, cultural pressure, and the risk of being discovered by coworkers or others, further complicated the development of reliable sources. Despite these challenges, SIGAR agents recruited 140 confidential sources and dozens of others who provided valuable information, leads, and assistance. SIGAR agents also established and maintained strong relationships with Afghan officials at the working level who, at personal peril, supplied crucial context and usable information that advanced investigations.

Obtaining records from Afghan entities posed significant challenges that were more difficult to overcome. For example, the use of reconstruction funding to advance the Afghan First Initiative (AFI), which aimed to support U.S. counterinsurgency objectives by boosting Afghan employment and improving the economy, meant that many contractors and vendors the United States used were Afghan nationals, some of whom were corrupt and protected by local and national officials. Consequently, AFI funds often went to people and businesses over whom the United States had limited oversight, making it difficult for SIGAR to obtain records or compel cooperation. This was generally true in all areas of reconstruction spending.

Additionally, obtaining financial records was challenging due to the often-impenetrable recordkeeping practices of banks and other financial institutions in Afghanistan. Bank records were sometimes incomplete or not current. Additionally, they generally could not be authenticated in ways that would make them admissible in U.S. courts. The more sophisticated targets of SIGAR's investigations protected their activities and assets by using banks in countries unlikely to cooperate with U.S. financial investigations such as the United Arab Emirates, China, Russia, Turkey, and Iran. Many Afghans used the informal money-transfer system (*hawala*) to move money in and outside the country. These money-transfer businesses (*hawaladars*) are largely unregulated and rely on handwritten records that are difficult to obtain and decipher without cooperation from those involved, which was rarely forthcoming.¹⁴⁰ Even when SIGAR managed to obtain Afghan financial records, translating these documents was often time-consuming, expensive, and required hard-to-find resources.

Notwithstanding these challenges, SIGAR was the first known investigative entity to obtain certified Afghan bank records deemed admissible in a U.S. court. Such records were first used to build a case against dual U.S.-Afghan citizen Azam Doost, who was convicted of multiple counts of fraud and money laundering in 2018.

U.S. Agencies Cooperating with SIGAR Did Not Always Share the Same Priorities

Occasionally, U.S. agencies, such as DOJ and DOD, assisted SIGAR. Such support included helping SIGAR agents get into the field and providing records and other information, sometimes classified. However, competing interests and priorities sometimes hindered the consistent support SIGAR needed. At the U.S. Embassy Kabul, SIGAR agents purposefully fostered and maintained close working relationships with various embassy sections, including the consular, economic and political sections, and the DOJ and Department of the Treasury (Treasury) Attaché offices. These connections were especially helpful in the Hikmat case (see pages 72–75) and other investigations involving fuel theft and issues covered by Treasury’s Office of Foreign Assets Control (OFAC).¹⁴¹

Unfortunately, U.S. embassy officials were preoccupied by political and diplomatic considerations and objected to the investigation and prosecution of some prominent Afghans. They were particularly concerned that SIGAR’s efforts might complicate relationships with Afghan leaders or interfere with matters they considered more important than SIGAR’s mission. For example, in 2013, the Deputy U.S. Ambassador in Kabul instructed a DOJ official working with SIGAR to drop further investigation of Mahmoud Karzai (President Hamid Karzai’s brother) and First Vice President Fahim Kahn, both of whom were connected to a nearly \$1 billion fraud scheme that resulted in the near-collapse of Afghanistan’s largest bank in 2010.¹⁴² At times, embassy officials treated SIGAR investigations as time-consuming distractions that demoralized embassy staff.¹⁴³

Meantime, U.S. intelligence agencies were often more focused on their own missions than on supporting SIGAR’s investigations of waste, fraud, and abuse. For example, although the Afghan Threat Finance Cell (ATFC)—set up to identify, disrupt, and eliminate illicit financial networks in Afghanistan—was helpful, it used its considerable collection and analytical capabilities primarily to produce actionable intelligence for the U.S. military.¹⁴⁴

The assistance the U.S. military provided to SIGAR agents was essential, especially transportation to various locations throughout Afghanistan. However, military support varied depending on International Security Assistance Force (ISAF) senior leadership and U.S. Forces-Afghanistan (USFOR-A) commanders.¹⁴⁵ Although ISAF and USFOR-A did seek to address corruption that affected the military mission and cooperated in the investigation and prosecution of some fuel-theft cases, “ghost soldier” pay issues, and compromised culverts on Highway 1, U.S. commanders understandably concentrated primarily on ensuring coalition troops and their Afghan partners received uninterrupted supplies of fuel, food, water, and other needs for their warfighting mission.¹⁴⁶

Back home, a lack of adequate support from U.S. prosecutors meant that, while multiple SIGAR cases were successfully prosecuted in the United States, others ended without convictions or forfeiture. At times, SIGAR was hindered by DOJ policies on which cases should be prosecuted, personnel constraints with prosecutors hired under the Special Inspector General Prosecutor (SIGPRO) program, and the difficulties in finding a jurisdiction and venue for timely prosecution.

Assistant U.S. Attorneys:

Federal prosecutors who work in civil-servant positions under presidentially appointed U.S. attorneys.

SIGAR cases were screened for prosecution by attorneys in the Fraud Section of DOJ's Criminal Division, SIGAR-hired or DOJ-detailed SIGPROs, or **Assistant U.S. Attorneys (AUSA)** in one of the 93 U.S. Attorney's Offices.¹⁴⁷ Working with the Fraud Section gave SIGAR access to prosecutors with specialized knowledge and experience in fraud investigations and prosecutions, but proved discouraging. Notably, the Fraud Section was slow to act with several cases languishing for seven to nine years before a decision on prosecution was made. Policies such as not charging corporations unless individuals could also be charged frustrated SIGAR's efforts to get cases prosecuted.

SIGPROs were either employed directly by SIGAR or detailed to SIGAR from various U.S. Attorney's Offices. Initially, the SIGPRO model worked well, providing SIGAR agents with direct access to their own prosecutors who could offer advice and bring criminal and civil cases wherever jurisdiction could be found. Many of the early SIGPROs were former AUSAs or veterans of one of the military Judge Advocate General corps. Over time, however, SIGPROs were comprised of less-experienced attorneys who were forced to learn on the job and had little or no experience handling the international issues associated with many of SIGAR's cases.¹⁴⁸

As a result, SIGAR agents frequently found themselves "shopping" cases in the United States to AUSAs in districts where jurisdiction and venue for prosecution could be found. Most successful prosecutions and forfeitures were handled this way. Conflicts between U.S. Attorney's Offices over jurisdiction, as well as with the DOJ, sometimes led to delays and errors. U.S. Attorney's Offices were understandably focused on different priorities from SIGAR and did not always allocate the resources necessary to successfully prosecute SIGAR's cases.

The U.S. Government's Use of Multiple Contracting Databases Made Fraud More Difficult to Detect

U.S. reconstruction funds for Afghanistan came from numerous government sources, each employing a variety of methods for soliciting, awarding, and managing contracts, and disbursing funds. It was often unclear how Afghan bidders were vetted, whether they had the capacity and resources to fulfill the contracts, whether the process was being manipulated, or whether they had satisfactorily performed on prior contracts. In addition to the System for Award Management (SAM), an official U.S. government system for contract and assistance award listings, USAID, DOD, and State maintained their own independent contracting databases. International agencies and organizations involved in reconstruction projects (e.g., the UN, ADB, World Bank) also kept independent databases unavailable to SIGAR investigators.

U.S. contracting authorities used as many as six different methods to announce contract solicitations to the Afghan business community and at least seven separate databases to vet contractor ownership and capacity.¹⁴⁹ This system came with a cost. Without a centralized database or website to consolidate contracting information, it was not always possible to thoroughly vet bidders before contracts were awarded. As a result, bidders who understood how to exploit and manipulate the weaknesses in the vetting process were able to secure contracts, even if they had previously been involved in fraud or had performed poorly.

SIGAR'S EXPERIENCE CONDUCTING INVESTIGATIONS AND PROSECUTIONS REVEALS SEVERAL LESSONS

Multiple lessons emerged from SIGAR's experience conducting investigations and pursuing prosecutions in Afghanistan. First, having investigative staff physically present in-country can significantly improve the chances of successful investigation and prosecution. Second, an aggressive bank-asset seizure program can help recover taxpayer money. Third, special attention to suspension and debarment can help mitigate waste, fraud, and abuse. Finally, expertise from across the U.S. government can assist investigations and prosecutions in complex environments.

An In-Country Presence Provides Investigative Dividends

SIGAR deployed a significant contingent of investigators to Kabul for as long as the U.S. embassy there remained open. Additionally, SIGAR maintained a hotline anyone in Afghanistan or elsewhere with a complaint or a tip could use to report waste, fraud, and abuse. Two native Dari and Pashto speakers who had previously worked as FSNs for SIGAR in Kabul helped field and process what was reported to the hotline. Tips received by SIGAR often resulted in actionable information leading to investigations that ended in successful prosecutions, asset recovery, remediation, and suspensions and debarments.

While SIGAR's Hotline and other outreach programs were vital tools, SIGAR emphasized nurturing and expanding an already extensive network of sources within Afghanistan and the United States to compensate for the difficulty SIGAR had in moving around a war zone. In particular, SIGAR investigators maintained robust outreach programs to Afghan government officials. Some of SIGAR's best cases succeeded using high-placed sources that SIGAR investigators developed and nurtured.¹⁵⁰

A SIGAR Special Agent Was Recognized for Heroism During a 2013 Attack on the U.S. Consulate in Herat

SIGAR's in-country presence was exemplified by one Special Agent's participation in the defense of the U.S. Consulate in Herat during an early morning attack.

At 5:30 a.m. on September 13, 2013, a large truck drove up to the front gate of the consulate and detonated a massive bomb, killing the guard force there and causing extensive damage to the consulate building. SIGAR Special Agent Jeffrey M. Millsagle, who was assigned to the consulate and was one of the few armed personnel there, was given specific duties in case of an attack to defend the building and protect and evacuate employees until the U.S. military could respond.

Millsagle was asleep when the attack began and was blown out of his bed. Nevertheless, he immediately grabbed his service pistol and began evacuating consulate staff. Then, insurgents initiated a secondary attack and the building was struck by rocket propelled grenades and machine gun fire. Millsagle continued evacuating personnel and retrieved his service rifle, ballistic helmet, and vest from SIGAR's destroyed office. He returned fire at the invading insurgents outside the building. Once all consulate staff were secured, Millsagle was given a machine gun and assigned to protect the back door of the building. Millsagle stayed at this position until the U.S. military arrived and eventually secured the compound.

As a result of the attack, SIGAR's office and much of the consulate building were destroyed. Due to the extensive damage and lack of security, the consulate was moved to the Herat Airport and the old consulate was abandoned.

In recognition of his actions, Special Agent Millsagle received the U.S. Department of State Award for Heroism and the CIGIE Sentinel Award for Dedication and Courage. Millsagle had previously survived a separate, very serious coordinated attack while stationed by SIGAR at a military base in Khost Province in eastern Afghanistan.

An Aggressive Bank-Asset Seizure Program Can Help Recover Taxpayer Money

SIGAR initiated the first ever attempt to seize assets held in an Afghan bank account in an innovative effort to fight corruption. The bank account was owned by a corrupt Afghan trucking contractor who defrauded the United States of more than \$70 million by charging inflated prices for trucking contracts to deliver U.S. military supplies. The contracts were obtained through bribery, kickbacks, and bid rigging.

Working with DOJ, SIGAR obtained a court order in Washington, DC, to seize the assets held in the contractor's bank accounts in Afghanistan. By the time the warrant was executed by the Afghan attorney general, the bulk of the assets had been transferred to banks in Dubai and elsewhere. Undeterred, SIGAR served arrest warrants on several major correspondent banks in New York and was ultimately able to recover \$25 million. According to DOJ, no one had ever tried this before in Afghanistan.¹⁵¹



In this photo from Da Afghanistan Bank's X (formerly Twitter) account, workers unload purported cash for humanitarian assistance at Kabul Airport. SIGAR routinely checks DAB's social media posts; however, we cannot verify their accuracy. Additionally, the date and time of the post may not correspond to the date and time the photo was taken. (Da Afghanistan Bank (@AFGCentralbank), X, November 2, 2022, 5:17 a.m.).

Following the U.S. Withdrawal, SIGAR Examined Capital Flight Connected to the Afghan Government's Collapse

After the U.S. withdrawal from Afghanistan, SIGAR continued its research and criminal investigations into corruption-related theft of U.S. taxpayer monies spent on reconstruction. For example, SIGAR engaged with law enforcement agencies and DOJ to initiate criminal inquiries and gather evidence as part of SIGAR's "Follow the Money" and "Capital Flight" initiatives.

Beginning in 2022, SIGAR's "Follow the Money" and "Capital Flight" initiatives included:

- (1) identifying all financial institutions in Afghanistan that U.S. reconstruction funds were deposited into for the 18-month period prior to the collapse of the Afghan government;
- (2) working with financial agencies and law enforcement partners to identify monetary outflows from Afghanistan likely connected to former Afghan government officials, politically connected Afghans, and others involved in suspicious transactions; and
- (3) developing networks and contacts to uncover the identity of individuals, entities, and shell corporations used by individuals who may have benefited from the theft of reconstruction funds or capital flight from Afghanistan.

As a result of these initiatives, SIGAR made criminal referrals to U.S. law enforcement agencies and presented specific findings to federal prosecutors. Additionally, results from the intelligence gathering efforts were incorporated into a successful Global Magnitsky Sanctions designation of two former senior Afghan government officials for perpetrating a complex procurement corruption scheme resulting in the misappropriation of millions of dollars from U.S. government-funded contracts.

Special Attention to Suspension and Debarment Can Help Prevent Waste, Fraud, and Abuse

In addition to seeking criminal convictions and asset recoveries, an innovative program unique to SIGAR sought to suspend or debar any contractor who engaged in wrongdoing from conducting future business with the United States. Although SIGAR did not have direct authority to suspend or debar contractors from receiving government contracts, SIGAR referred many poor performers and bad actors to U.S. agencies for suspension and debarment.

SIGAR's suspension and debarment program covered all aspects of contracting in Afghanistan, notwithstanding the nationality of the contractor, who the contract awardee, or the location of the contracted work to be performed. SIGAR designated attorneys experienced with suspensions and debarments to work with investigators on case development and provide guidance on the use of suspensions and debarments. Although not all of the cases SIGAR investigated resulted in a criminal prosecution, asset recovery, or cost savings, no SIGAR case was closed unless it was first reviewed by one of the staff attorneys for possible suspension and debarment referral. By doing this in-house, SIGAR was able to ensure this important tool was not overlooked. SIGAR required its criminal investigative agents to provide officials in responsible agencies with a complete set of records and memoranda that met the requirements for supporting suspension and debarment so decisions could be made quickly and potentially avert further damage.

SIGAR's suspension and debarment focus was effective in preventing waste, fraud, and abuse. From 2008 to 2021, SIGAR referred 582 individuals and 494 companies for suspension and debarment. These 1,076 referrals resulted in 141 suspensions and 582 finalized debarments or special entity designations. An additional 31 individuals and companies entered into administrative agreements with the U.S. government in lieu of exclusion from contracting.¹⁵² Implementing a suspension and debarment program similar to SIGAR's would help mitigate waste, fraud, and abuse in future contingency environments.

SIGAR Worked with the UN to Jointly Vet Hundreds of Individuals, Companies, and Nongovernmental Organizations

The United States was the largest single financial contributor to the United Nations, which played a major role in humanitarian and development assistance to Afghanistan. The UN became the primary conduit for U.S. aid to Afghanistan after the 2021 Taliban takeover. Beginning in 2013, SIGAR maintained a robust contractor vetting initiative with various UN agencies to address aid-related fraud, theft, and corruption. These UN agencies and SIGAR routinely exchanged aid-related contractor intelligence to detect and prevent fraudulent contracting activity and identify criminal individuals and entities. SIGAR and its UN partners jointly vetted hundreds of individuals, companies, and nongovernmental organizations. That vetting resulted in significant financial savings (estimated by the UN Development Programme at \$25 million) to both the UN and the U.S. taxpayer.¹⁵³

Expertise from Across the U.S. Government Can Assist Investigations and Prosecutions in Complex Environments

SIGAR's agents were typically retired federal and local law enforcement officers with at least 20 years of investigative experience. To augment their work, SIGAR sought investigative and prosecutorial support from other agencies. As previously described, due to competing priorities, other U.S. government entities often did not assist SIGAR to the extent desired. However, in instances where there was significant cooperation, SIGAR benefited greatly.

For example, SIGAR agents often relied on their counterparts within the U.S. law enforcement community at post in Kabul or within the embassy community (e.g., FBI, DEA, Defense Criminal Investigative Service (DCIS), USAID OIG, State OIG, State Bureau of Diplomatic Security) for information and actionable intelligence on subjects of interest to SIGAR. This ranged from working jointly on investigations, routine sharing of intelligence (document exploitation and information obtained by means of electronic intercepts conducted by Afghan units supervised by DEA), participating in briefings, and conducting joint interviews.

SIGAR's investigations benefited significantly from cooperation and assistance its agents received from their counterparts in other U.S. law enforcement agencies both in Afghanistan and in the United States. This was especially true of SIGAR's participation in the International Contract Corruption Task Force (ICCTF). The ICCTF was originally created in 2006 as a collaborative effort between seven U.S. agencies tasked with investigating fraud associated with reconstruction and humanitarian efforts in Iraq and Afghanistan.¹⁵⁴ SIGAR joined the ICCTF in 2009. Some of SIGAR's earliest investigations, which it worked jointly with ICCTF agents, resulted in successful prosecutions in the United States. The ICCTF is an example of how close cooperation between law enforcement partners worked in a complex environment like Afghanistan.

The assistance SIGAR received from the U.S. military was essential, and SIGAR's relationship with the Combined Security Transition Command–Afghanistan (CSTC-A), the military organization that oversaw the training and equipping of Afghan forces, was especially helpful given that a significant amount of military reconstruction aid and assistance in Afghanistan was delivered by CSTC-A. CSTC-A commanders and SIGAR agents met regularly to exchange information and discuss concerns. Outside Kabul, SIGAR agents assigned to military sites maintained relationships with senior military leaders and others on the ground, for example, at Bagram, Kandahar, Mazar-e Sharif, and Camp Leatherneck. These relationships advanced investigations of waste, fraud, and abuse by making it possible for agents to get out to see what was going on and meet the people implementing reconstruction projects and using reconstruction funds. Also, military commanders and others in field locations had access to SIGAR staff on site to raise concerns about the misuse of reconstruction funds.

In one example, senior military officials encouraged SIGAR to investigate the construction of a 64,000 square foot command and control facility at Camp Leatherneck because they believed it exemplified a larger problem with wasteful military construction. A senior U.S. military official told SIGAR that the building had never been used and would probably be torn down or transferred to the Afghan government who had no way of using or maintaining it.¹⁵⁵

FIVE CASES ILLUSTRATE THE CHALLENGES AND SUCCESSES OF CRIMINAL PROSECUTIONS IN AFGHANISTAN

As previously described, the theft of U.S. taxpayer dollars in Afghanistan took a variety of forms. SIGAR’s investigations involved contract fraud, collusion, bid rigging, theft of funds, and conspiracy to defraud the U.S. government, among other crimes.

In one contract fraud case, SIGAR investigated an Afghan company that deliberately installed substandard grates on culverts, leading to the deaths of two U.S. soldiers. In a collusion case, SIGAR investigated an Afghan fuel supplier who bribed U.S. military personnel to accept false invoices for fuel the company did not deliver and instead sold on the black market. In a bid-rigging case, SIGAR investigated an Afghan businessman who cornered the market on delivering essential goods to U.S. bases in Kandahar and overcharged the United States by \$52 million. In a theft of funds case, SIGAR investigated the owner of an Afghan mining company, who attempted to steal U.S. funds distributed by the OPIC, a U.S. government development-finance institution. In a tax and conspiracy case, SIGAR jointly investigated, with the Internal Revenue Service, what DOJ described as “the biggest tax evasion case in DOJ history.” Each of these cases is described further below.

Case #1: A SIGAR Investigation Saved Lives by Holding a Contractor Accountable for Faulty Culvert Gates

As part of a U.S.-funded project to improve Highway 1, a route frequently used by U.S. and Coalition forces in Ghazni Province, the U.S. military decided to install tamper-proof grates over the openings of culverts running beneath the highway. This “culvert denial” effort was undertaken to stop insurgents from planting explosives in the culverts. An Afghan-owned company, Afghan Mercury Construction Company (AMCC), was awarded a contract in 2012 to install the grates. In July 2012, two U.S. soldiers were killed when insurgents triggered an improvised explosive device concealed in one of those culverts.

By the time the soldiers were killed, AMCC’s owners had already been paid for work that was substandard or never completed. Their fraud resulted in the installation of 122 culvert-denial systems that were not anchored with concrete, as required by the contract, were spot welded in ways that made them easy to breach and had gaps around the edges of the rebar grills that made the grates easy to circumvent. The company’s deceit and shoddy work made it possible for insurgents to bypass the grates and plant the explosives that killed the two soldiers.¹⁵⁶

This case proved to be another example where the security situation presented an obstacle to SIGAR in accessing crime scenes. It took months to get a military convoy approved and organized to take a SIGAR agent “outside the wire” of a military base to personally examine, photograph, and confirm the fraud. However, based on evidence developed by SIGAR, the Afghan Attorney General’s Office arrested Abdul Anas Sultani, the president of AMCC, on January 27, 2013, on charges of fraud and negligence in the deaths of the two soldiers. The charges alleged that Sultani failed to install the grates as contracted and lied about it to get paid. In February 2013, a subcontractor of AMCC was also arrested by the Attorney General’s Office for fraud. The investigation prompted efforts elsewhere in Afghanistan to prevent a repeat of what happened on Highway 1.

Case #2: SIGAR Special Agents Uncovered a \$1.25 Million Bribery Scheme

For some time before 2010, an Afghan businessman operating AAA Trucking stole large amounts of U.S. fuel—known as “liquid gold” in Afghanistan—that was meant for a military base near Jalalabad Airport in northeast Afghanistan. Forward Operating Base (FOB) Fenty relied on the fuel to support U.S. and Afghan security operations in an especially dangerous part of Afghanistan.¹⁵⁷ Over time, the Afghan owner of AAA Trucking paid \$1.25 million in bribes to U.S. servicemembers to get them to accept false invoices and other documents so he could steal the fuel meant for FOB Fenty to sell on the black market.¹⁵⁸

SIGAR agents worked with other federal law enforcement agencies on an investigation that culminated in the indictment and conviction of eight people in the United States—seven servicemembers and a civilian contractor—all of whom received significant prison sentences.¹⁵⁹ The defendants were ordered to forfeit \$1.25 million, representing the amount they were paid in bribes.¹⁶⁰ The U.S. government denied payment of \$470,000 owed to AAA Trucking and debarred it from future contracts.¹⁶¹ As was typical, the Afghan Attorney General’s Office failed to prosecute.¹⁶²

Case #3: A SIGAR Investigation of Fuel Overpayments in Kandahar Province Resulted in a \$25 Million Recovery

As part of its Afghan First Initiative, the United States used Afghan contractors to deliver fuel, food, bottled water, and other essential goods by truck to various locations throughout Afghanistan, including coalition bases in Kandahar. Reliable delivery of supplies was vital to the success of the U.S. reconstruction mission. The United States funded these operations while NATO administered the funds by hiring a German firm to manage the program.

Among the 12 subcontractors used by the German company was a young, politically well-connected Pashtun entrepreneur from Kandahar, Hikmatullah Shadman (Hikmat), who claimed to own Hikmat Shadman Construction Company. When he first came to SIGAR’s attention in 2012, Hikmat was in military detention in Kandahar, suspected of, among other things, helping to finance the Taliban.¹⁶³

From 2010 through 2012, Hikmat bribed and paid kickbacks to program managers and others, and engaged in bid rigging to ensure he was regularly relied upon for making

the fuel deliveries the United States needed in Kandahar. He won more than one-third of the transportation requests for Kandahar and was paid nearly \$71 million, nearly half of all disbursements made under the NATO contract. He exploited his position to greatly overcharge for his services.¹⁶⁴ As a result, the United States paid as much as \$52 million more than it should have for the needed supplies. At the same time, Hikmat was suspected of helping support the insurgency.¹⁶⁵

After protracted litigation, the United States recovered \$25 million of the \$52 million Hikmat realized from his scheme.¹⁶⁶ In 2019 Hikmat's company entered a corporate guilty plea to conspiracy and bribery in U.S. District Court for the District of Columbia. The company was put on five years' probation, ordered to forfeit \$190,000, and pay an \$810,000 fine.¹⁶⁷ Six members of the U.S. Special Forces involved in Hikmat's scheme eventually pleaded guilty to bribery and other offenses and were sentenced to prison terms ranging from four to 10 years.¹⁶⁸

The outcome SIGAR achieved in the Hikmat case was the result of a civil forfeiture action by the Asset Forfeiture Money Laundering Section of DOJ's criminal division. This case demonstrates the possibilities of rigorous criminal investigations in Afghanistan, the advantages of close cooperation between SIGAR and DOJ, and the impediments confronted by SIGAR's agents.¹⁶⁹ In this case, SIGAR was able to help recover a substantial portion of what Hikmat took from the United States. But this result came only after successfully solving the problems associated with his "Law of Armed Conflict" detainee status, dealing with potential diplomatic complications, overcoming the difficulty of acquiring control of the proceeds of Hikmat's crimes, and working around the corrupt influence of senior Afghan officials. These included then-Afghan President Hamid Karzai, who interfered to unfreeze Hikmat's accounts after they were first blocked.¹⁷⁰

Case #4: A SIGAR Fraud Investigation Relating to a \$15.8 million OPIC Loan Resulted in Imprisonment of a Dual Afghan-U.S. Citizen

Too often in Afghanistan, loans made by U.S. lenders were either not used for their intended purpose or loan applications were supported by false documents. With the assistance of foreign governments that helped make relevant records and witnesses available to SIGAR, a successful prosecution for this kind of fraud was brought against Azam Doost, a dual U.S. and Afghan citizen residing in the United States.

In 2006, the Afghan government awarded Doost's company, Equity Capital Mining (ECM), the rights to mine marble at the White Dove Marble Mine in Chishti-i-Sharif, Herat Province.¹⁷¹ To finance the mining operation, ECM obtained a loan from OPIC.¹⁷² Under the terms of the loan agreement, proceeds were to be used only for the development, maintenance, and operation of the mine. ECM and Doost were required to inform OPIC of arrangements they had with any vendor they used in connection with the work.¹⁷³

In 2010, ECM submitted vendor invoices to OPIC ostensibly for goods and services supplied to operate the mine. OPIC disbursed \$15.8 million in loan proceeds directly to the vendors' foreign bank accounts.¹⁷⁴ A SIGAR investigation, conducted with the

support of several cooperating agencies, revealed that at least some of the invoices were fraudulent, that payments were made to entities in which Doost had an undisclosed interest, and that money paid to other vendors was transferred to Doost.¹⁷⁵

As part of the investigation, DOJ issued Mutual Legal Assistance Treaty requests and Letters of Request to obtain corporate and banking records from Italy, Afghanistan, and the United Arab Emirates. The Emirates failed to produce any admissible records, but Italy's help was substantial, including providing vendor's records and access to witnesses whose recorded testimony were later presented at trial. Significantly, this investigation marked the first time the Afghan government produced bank records that could be used in U.S. courts.¹⁷⁶

Those records showed Doost's relationship to several vendors and documented the flow of the OPIC loan proceeds first to the vendors and then to Doost-affiliated bank accounts. Relying principally on the records, prosecutors indicted Doost on multiple counts of fraud and money laundering under various federal statutes.¹⁷⁷ In 2018, Doost was prosecuted in the United States due to his dual citizenship. He was convicted on all but three counts (those three counts were connected to money laundering in the UAE) and sentenced to 54 months imprisonment and 36 months of probation. He was also ordered to pay over \$8.9 million in both restitution and forfeiture.¹⁷⁸

Case #5: SIGAR and the IRS Jointly Investigated One of the Largest Tax Evasion and Tax-Crimes Conspiracy Cases in DOJ History

One of SIGAR's most prominent investigations involved a former defense contractor, Douglas Edelman, and his wife, Delphine Le Dain, who together carried out a decades-long scheme to defraud the United States and evade taxes on hundreds of millions of dollars in income from his contracts with DOD. DOJ has described this case as "the biggest tax evasion case in DOJ history," with \$418 million in potential recovered costs.

The income was largely made while Edelman was a defense contractor during U.S. military efforts in Afghanistan and the Middle East from 2003 to 2020. Edelman was arrested in Spain in July 2024 and extradited to the United States that September. In May 2025, he pleaded guilty to tax crimes related to his scheme.

Four former employees and executives from Mina Corporation and Red Star Enterprises, the sister defense contractor companies Edelman half owned, also pleaded guilty to federal tax evasion and other related criminal charges. Two former colleagues involved in Edelman-owned businesses pleaded guilty as well. Mina and Red Star received more than \$7 billion from DOD contracts to provide jet fuel to U.S. troops in Afghanistan and the Middle East.

DOJ tasked SIGAR and the IRS Criminal Investigation with investigating Edelman and his wife in September 2018. SIGAR's work was crucial to bringing conspiracy to defraud the U.S. government charges against Edelman and his colleagues, which carry a greater criminal penalty than tax evasion.

As a Result of Intelligence Gathered by SIGAR, Treasury Sanctioned Two Former Senior Afghan Government Officials for Transnational Corruption

In December 2023, following their nomination by SIGAR under the Global Magnitsky Human Rights Accountability Act, two former senior Afghan government officials were sanctioned by Treasury's Office of Foreign Assets Control for widespread involvement in international corruption.

Initially signed in 2012 and expanded in 2016, the Global Magnitsky Act targets perpetrators of significant human rights abuses and corruption globally. As a result of the OFAC sanctions, all property and interests on property of the former officials—Mir Rahman Rahmani and his son, Ajmal Rahmani—that were in the United States or in the possession or control of U.S. persons were blocked. In addition, among other consequences, any entities that were 50 percent or more owned by them were also blocked.

The Rahmanis were involved in fuel theft and other crimes in Afghanistan. Their criminal activity was extensive and included artificially inflating the price of contracts to deliver fuel to Afghan security forces; fraudulently importing and selling tax-free fuel owed on their contracts; and bribing their way into seats in the Afghan Parliament, where they used their positions to perpetuate their corruption.

The Rahmanis' schemes involved bid rigging and eliminating competition on contracts funded by U.S. taxpayers. For example, in 2014, several families involved in the fuel business, including the Rahmanis, colluded to inflate fuel prices on U.S.-funded contracts by more than \$200 million and eliminate competitor bids. The Rahmanis also under-delivered on their companies' fuel contracts, enhancing their corrupt fuel profits. One of their companies, Secure Movement Logistics, bribed Afghan National Army personnel to hide their non-delivery of fuel, allowing at least 11 million liters of fuel to go undelivered.

Although their corrupt activities occurred in Afghanistan, the Rahmanis maintained an international corrupt network. Treasury designated 41 entities under the Global Magnitsky Act as being owned or controlled by, or for having acted or purported to act for or on behalf of Ajmal Rahmani. The sanctions signified that bad actors who engaged in rampant corruption and abuse on a global scale had been brought to justice and made to suffer severe consequences.

CONCLUSION

SIGAR's criminal investigators faced a multitude of challenges. Despite these challenges, SIGAR agents helped convict 171 defendants in the United States and Afghanistan and produced \$1.67 billion in criminal fines, restitutions, asset forfeitures, civil settlements, recoveries and cost savings to the U.S. government. SIGAR also referred 1,076 individuals and companies to appropriate U.S. government authorities for suspension and debarment. In some cases, lives were likely saved.

Several lessons emerge from SIGAR's experience that may be useful for entities tasked with guarding against the theft of U.S. tax dollars in future conflict zones:

- A robust, in-country presence is critical to establishing a network of local sources to overcome the difficulty of conducting on-site investigations amid an ongoing war.
- An aggressive bank-asset seizure program can reap dividends, particularly with innovative approaches such as serving warrants on U.S.-based correspondent banks to mitigate jurisdictional limitations that would otherwise prevent recovery of stolen funds.
- Special attention to suspension and debarment can help prevent waste, fraud, and abuse by preventing law-breaking contracting entities and individuals from obtaining additional U.S. contracts.
- Expertise from across the U.S. government—including from interagency task forces, the intelligence community, and the military—can significantly assist investigations and prosecutions in complex environments.



CHAPTER 6

MULTIPLE FACTORS CONTRIBUTED TO THE FAILURE OF THE U.S. EFFORT TO BUILD A STABLE, DEMOCRATIC AFGHANISTAN

Over two decades, the United States invested billions of dollars and incurred thousands of casualties in a mission that promised to bring stability and democracy to Afghanistan, yet ultimately delivered neither.¹⁷⁹ The rapid collapse of the Afghan government in August 2021 laid bare the fragility that had been concealed by years of confident assertions of progress. The gap between ambition and reality was vast, with deteriorating conditions continually stymying objectives that proved to be unrealistic.

An Afghan burqa-clad woman looks for alms as she sits in the middle of the road after the Eid al-Adha prayers in Kabul on June 7, 2025. (AFP photo by Wakil Kohsar)

This chapter examines the factors that contributed to the failure of the 20-year armed nation-building campaign in Afghanistan.¹⁸⁰ It also explores some key questions:

- Was the outcome of the U.S. nation-building effort in Afghanistan inevitable given the obstacles to success?
- Did any one factor or combination of factors determine that outcome?
- Could U.S. efforts have succeeded if different decisions had been made?

While difficult to answer, these questions are worth asking. Before committing to future reconstruction efforts in other conflict-affected countries, officials and policymakers need to understand the factors that contributed to failure in Afghanistan, evaluate the viability of success in similar environments, and determine whether such efforts are worth the sacrifices of U.S. blood and treasure they may entail.

SIGAR investigated these questions through two avenues. First, relying primarily on its own prior reporting and institutional understanding of U.S. reconstruction, SIGAR compared U.S. ambitions for Afghanistan with the poor results of the intervention. Much of this analysis is based on SIGAR’s series of lessons-learned reports that evaluated whole reconstruction sectors, including assistance to Afghan security forces, private sector development, anticorruption, stabilization, and counternarcotics. These reports revealed fundamental flaws in America’s two-decade long mission in Afghanistan. For example, the U.S. government:

- continuously struggled to develop a coherent strategy for what it hoped to achieve;
- created unrealistic timelines and expectations that prioritized spending quickly, which led to increased corruption and reduced program effectiveness;
- built institutions and created infrastructure that could not be sustained;
- rarely conducted sufficient monitoring and evaluation to understand the impact of its programs;
- failed to understand Afghanistan’s complex social, economic, and political dynamics and tailor its efforts accordingly; and
- failed to appreciate the negative effect an ongoing war had on the chances that its reconstruction efforts would succeed.¹⁸¹

Second, SIGAR interviewed former senior U.S. government officials and other participants in, and observers of, the reconstruction effort, probing whether the myriad conditions that led to the collapse were so deeply entrenched that success was never truly an option.¹⁸² While interviewees varied on when the U.S. mission in Afghanistan became futile, a common conclusion emerged: The seeds of failure had been sown long before the final withdrawal. More critically, success—when measured against the ambitious goals set by the United States—may never have been achievable, regardless of the strategies adopted or the resources committed.

The chapter begins with a brief overview of the beginning of the U.S. effort in Afghanistan. The next section discusses U.S. attempts to build a stable, democratic Afghanistan by improving its economy and establishing credible elections, rule of law, and independent and effective security forces. The chapter then presents perspectives on whether failure of the reconstruction effort was inevitable and on key decisions that might have changed the outcome. It concludes with an appeal to policymakers facing hard decisions in the future to carefully consider the limits of U.S. nation-building in severely underdeveloped countries with active conflicts.

Highlight: SIGAR Issued Two Evaluation Reports on the Collapses of the Afghan Government and its Security Forces

SIGAR issued two evaluation reports following the 2021 collapse of the Afghan government and its security forces. These reports looked at the factors that contributed to the collapses.

The first report, *Why the Afghan Government Collapsed*, was issued in 2022. In it, SIGAR identified six factors that contributed to the collapse of the Afghan government in August 2021. First, the Afghan government failed to recognize that the United States would actually leave. The result was that the Afghan government was fundamentally unprepared to manage the fight against the Taliban as the United States military and its contractors withdrew. Second, the exclusion of the Afghan government from U.S.-Taliban talks weakened and undermined it. Third, despite its weakened position, the Afghan government insisted that the Taliban be effectively integrated into the Republic, making progress on peace negotiations difficult. Fourth, the Taliban were unwilling to compromise. Fifth, former Afghan President Ashraf Ghani governed through a highly selective, narrow circle of loyalists, destabilizing the government at a critical juncture. And finally, the Afghan government's high level of centralization, endemic corruption, and struggle to attain legitimacy were long-term contributors to its eventual collapse.

The second report, *Why the Afghan Security Forces Collapsed*, was issued in 2023. In it, SIGAR found that the decision by two U.S. presidents to withdraw U.S. military forces from Afghanistan fundamentally altered every subsequent decision by U.S. government agencies, the Ghani administration, and the Taliban. Actions taken by each ultimately accelerated the collapse of the ANDSF in August 2021. But the stage had been set for that collapse long before this time, by the failure of the U.S. and Afghan governments to create an independent and self-sustainable ANDSF, despite 20 years and \$90 billion of international support.

THE U.S. RECONSTRUCTION EFFORT ATTEMPTED TO TRANSFORM A WAR-TORN, UNDERDEVELOPED COUNTRY INTO A MODERN, PROSPEROUS DEMOCRACY

Following the September 11, 2001, attacks, the United States focused on two key objectives in Afghanistan: disrupting and dismantling al-Qaeda and preventing the country from becoming a haven for terrorists.¹⁸³ However, what began as a relatively contained security mission quickly expanded into something much broader. Although called a “reconstruction” mission—as reflected in SIGAR’s acronym—the U.S. intervention in Afghanistan was essentially a nation-building endeavor. Unlike past reconstruction efforts in places like post-World War II Europe or Japan where the United States sought to rebuild countries with modern economies, industry, and infrastructure that had been degraded by war, Afghanistan was a severely underdeveloped state. As a result, “reconstruction” there often involved trying to create capabilities, systems, and institutions of a type and quality that Afghanistan had never possessed.

U.S. ambitions were evident as early as April 2002 when President George W. Bush called for a post-World War II-style Marshall Plan for Afghanistan during a speech at the Virginia Military Institute.¹⁸⁴ The subsequent Afghanistan Freedom Support Act passed by Congress in December 2002 codified the U.S. shift toward nation-building, calling for the creation of a new democratic government that was “broad-based, multi-ethnic, gender-sensitive, and fully representative.”¹⁸⁵ This vision was repeatedly reflected in subsequent U.S. strategic documents, and the goal of establishing a stable, democratic, and accountable Afghan government remained a central focus for 20 years.¹⁸⁶

The theory of change went something like this: If the United States could help the Afghan government successfully restore security, improve rule of law, expand access to public goods such as roads, electricity, education, and healthcare, and rehabilitate the economy, Afghans would perceive the government as capable and legitimate. This, in turn, would reduce public support for—and eventually defeat—the Taliban, thereby decreasing the chances of al-Qaeda’s resurgence.¹⁸⁷ However, this theory masked deeper contradictions in the U.S. approach. Ultimately, the relentless pursuit of reconstruction resulted in perpetual Afghan government dependency, fueled corruption, and in some cases strengthened the very insurgency it sought to undermine. When it came to nation building in Afghanistan, the eventual outcome was complete U.S. failure.

Afghanistan’s history is a testament to the futility of external attempts to impose control or implement unwanted reforms. From the British in the nineteenth century to the Soviets in the twentieth, every foreign power that has sought to reshape Afghanistan to its liking was met with fierce resistance and, ultimately, failure.¹⁸⁸ Following the Taliban takeover in 2021, Boston University Afghanistan expert Thomas Barfield reflected, “The United States was now the fourth world power to invade Afghanistan during the past 180 years with the expectation of transforming it and to depart when that project became a political liability at home.”¹⁸⁹ Furthermore, contended Carter Malkasian, former special assistant for strategy to the chairman of the Joint Chiefs of Staff, in his history of the U.S. war in Afghanistan, “Through the centuries, fighting invaders became part of what it meant to be Afghan.”¹⁹⁰

The Soviet invasion in 1979, followed by more than two decades of internal conflict, laid the groundwork for an enduring cycle of violence that, by 2001, had rendered Afghanistan’s sociopolitical landscape extraordinarily complex.¹⁹¹ The United States entered Afghanistan amid this protracted civil war. From the onset, the U.S. found itself attempting to navigate an intricate web of entrenched rivalries, shifting alliances, and a deeply ingrained culture of resistance to foreign intervention and centralized authority. These conditions were not merely challenges; they were structural barriers that consistently undermined the U.S. mission.

In 2001, Afghanistan also faced a staggering humanitarian crisis. According to UN reporting from October 2001, the country’s social and economic indicators

were comparable to, or even lower than, those of sub-Saharan Africa. Among 187 countries, only seven, including war-torn Sierra Leone and Zambia, had a lower life expectancy than Afghanistan. Roughly 70 percent of the Afghan population was estimated to be undernourished. The country also had one of the highest child mortality rates, with one in four children not surviving to their fifth birthday; only three nations—Angola, Niger, and Sierra Leone—fared worse in this regard. Literacy rates were equally dire, with nearly two-thirds of Afghan adults unable to read or write; only five countries had worse literacy statistics. Moreover, as of 1999, less than one-third of Afghan children were enrolled in school, a figure that positioned Afghanistan far behind other nations, particularly, the UN said, as the only country in the world where girls were prohibited from attending school.¹⁹² As the World Bank summarized in March 2002, “Afghanistan’s humanitarian, reconstruction, and development needs are immense. Its economy is in a state of collapse, its infrastructure destroyed, its formal state institutions severely undermined or nonexistent, and its social indicators the worst in the world.”¹⁹³

Despite little to no foundation to build upon, U.S. policymakers and leaders maintained extraordinarily high hopes for the country’s transformation. Secretary of State Condoleezza Rice declared in 2007 that while “we face historic challenges” in Afghanistan, “America will continue to stand with those courageous leaders and citizens who are striving to ensure that democracy, tolerance, and the rule of law succeed in their country.”¹⁹⁴ Former President George W. Bush summarized the U.S. effort in Afghanistan as “the ultimate nation-building mission,” one that involved “helping the Afghan people build a free society.”¹⁹⁵

BUILDING A STABLE DEMOCRACY FROM SCRATCH WAS EASIER SAID THAN DONE

To achieve the U.S. strategic vision of creating a stable, prosperous, and democratic Afghanistan, which remained a central focus for 20 years, the reconstruction effort sought to help the Afghan government provide security, rehabilitate the economy, and expand access to public goods, such as roads, electricity, education, and healthcare. This would prove much easier said than done.

In its 2021 report, *What We Need to Learn: Lessons from Twenty Years of Afghanistan Reconstruction*, SIGAR found that instead of being a society deconstructed to its foundation by conflict and primed for the introduction of western political, economic, and judicial systems, Afghanistan was a complex society with ingrained traditions and an incorrigible political economy. These traditions were neither easy to uproot and replace, nor could they be shoehorned into a Western institutional framework, as evidenced by attempts to use strongmen and warlords to build a nascent bureaucracy.¹⁹⁶

U.S. Alliances with Corrupt, Human-Rights-Abusing Powerbrokers Undermined the Mission and Bolstered the Insurgency

Throughout the intervention, the U.S. military relied on Afghan proxies to pursue its counterterror and counterinsurgency objectives.¹⁹⁷ Many of these proxies were known human rights abusers.¹⁹⁸ Lt. Gen. David Barno, the senior American commander of U.S. and Coalition forces in Afghanistan from 2003 to 2005, told SIGAR:

... of the Afghans I was interacting with ... a large number of ... those that would have been characterized as warlords had dirty hands in some way, shape, or form. They were involved with [the] drug trade. They had been involved with atrocities in previous Afghan wars. They were doing things that were probably human rights violations in terms of how they were running their particular province.¹⁹⁹

Some of these individuals and groups exploited their positions to pursue personal vendettas, reframing local disputes as part of the larger U.S.-led counterterrorism effort.²⁰⁰ Illustratively, UK Army General Nick Carter, who served multiple tours in Afghanistan between 2002 and 2013, said of Kandahar Province Governor Gul Agha Sherzai, “He made us flatten a whole load of people he wanted to get rid of. He claimed they were all Taliban, and we believed him. And the upshot of that is that we drove people into the arms of the insurgency.”²⁰¹ As the Taliban reconstituted themselves in the years following the U.S. occupation, they found support from Pashtun communities that had been victimized by these predatory U.S.-backed strongmen.²⁰² With the insurgency gaining strength, U.S. dependence on militia groups and strongmen only deepened.²⁰³

In response to the Taliban’s resurgence, the U.S. military embraced counterinsurgency (COIN) guidance enshrined in U.S. Army Field Manual 3-24. According to the manual, “The primary objective of any COIN operation is to foster development of effective governance by a legitimate government.”²⁰⁴ However, once DOD deemed money as a “weapons system” in 2009, commanders were often judged by the amount of Commander’s Emergency Response Program money they spent. With insufficient attention to impact and a frequent assumption that more money spent would translate into more progress, these projects may have exacerbated the very problems commanders hoped to address.²⁰⁵

COIN doctrine also cultivated the perception that the United States was conducting a benign form of warfare in Afghanistan, a compassionate intervention aimed at winning hearts and minds while minimizing harm to civilians. The reality was often one of brutal violence and strategic trade-offs in which predatory individuals or groups deemed essential to security objectives were able to act with impunity.²⁰⁶ As COIN-critic and Naval Postgraduate School professor Douglas Porch wrote of the U.S. surge in Afghanistan,

General David Petraeus’ reliance on decapitation and scorched-earth tactics supported by warlords and their networks of militia mafias to stabilize a manifestly corrupt and illegitimate regime in Afghanistan laid bare the vacuity of sunny COIN hearts and minds formulae for seducing biddable populations with benevolent acts and good governance.²⁰⁷

The U.S. alliance with Abdul Raziq is a stark example of a tradeoff that cast the COIN approach in a hypocritical light. A powerful police commander in Kandahar, Raziq

was widely accused of overseeing a regime of terror marked by extrajudicial killings, systemic torture, and forced disappearances. Despite these actions, the United States largely viewed Raziq as a necessary evil—an indispensable ally in the fight against the Taliban. His effectiveness in maintaining a semblance of order in a volatile region outweighed the glaring ethical costs in the eyes of U.S. officials. As former Combined Security Transition Command-Afghanistan commander Lt. Gen. Dan Bolger noted, “Where Raziq was in charge, there was absolute security, because he killed anyone who crossed him...That’s the guy to get stuff done in Afghanistan.”²⁰⁸

Raziq received millions of U.S. dollars to help fund and train his police, facilitating his meteoric rise in the south. Raziq’s forces were mentored by U.S. Special Forces and trained by contractors at a U.S.-funded center in Spin Boldak. DOD provided weapons, vehicles, and communications equipment, and paid the fighters’ salaries. Raziq received visits from such senior U.S. officials as Ambassador Karl Eikenberry and Generals Stanley McChrystal and David Petraeus. Faced with little oversight by Afghan or U.S. officials, Raziq continued to operate with impunity until his assassination by the Taliban in October 2018.²⁰⁹

The U.S. military’s tacit acceptance of sexual violence by Afghan allies further illustrates its willingness to abandon a supposed commitment to human rights for the sake of perceived security gains. This included tolerating the practice of *bacha bazi*, or “boy play,” which refers to the widespread sexual abuse of young boys by authority figures, including members of the Afghan security forces. A *New York Times* article from September 2015 indicated that U.S. soldiers in Afghanistan were instructed to turn a blind eye to sexual violence to maintain relationships with key local warlords and commanders. “The bigger picture was fighting the Taliban,” a former Marine lance corporal told the *Times*. “It wasn’t to stop molestation.” The spokesman for the American command in Afghanistan, Col. Brian Tribus, told the *Times*, “Generally, allegations of child sexual abuse by Afghan military or police personnel would be a matter of domestic Afghan criminal law.” He added that “there would be no express requirement that U.S. military personnel in Afghanistan report it.”²¹⁰

Ultimately, the U.S. mission to combat the Taliban was fatally undermined by its own actions. While official narratives praised the mission as a crusade for good governance and human rights, the United States simultaneously backed and empowered notorious warlords whose brutality and corruption stood in direct opposition to those very ideals. By legitimizing these strongmen with political and financial support, the United States not only entrenched a corrupt power structure but also perpetuated the impunity of malign actors.²¹¹ Michael Semple, a former UN officer in Afghanistan, observed that the Taliban “fed upon [the coalition’s] mistakes...and our failure to rein in the alienating practices of the people in the new establishment.”²¹² As the intervention dragged on, security steadily deteriorated. Despite more than \$80 billion in U.S. appropriations to build the Afghan security forces, by the late stages of the war, the Taliban controlled more territory than at any other point in the conflict, enemy-initiated attacks were on the rise, and Afghans’ fear for their personal safety had crescendoed.²¹³

U.S. Efforts Failed to Significantly Improve Economic and Social Conditions in Afghanistan

Improving Afghanistan's economy and development standards was supposed to be a cornerstone of the reconstruction mission, a crucial step in building a stable and self-reliant nation. In its 2018 report, *Private Sector Development: Lessons from the U.S. Experience in Afghanistan*, SIGAR found that economic growth was seen as a key driver of security, based on the assumption that a robust economy would keep young men in the workforce and out of the insurgency, create confidence in the government, and generate revenues that would enable the Afghan government to deliver services and mitigate its dependency on foreign donors.²¹⁴ Yet these efforts ultimately proved ineffective. By the time the government collapsed in August 2021, Afghanistan remained mired in poverty and underdevelopment.

Early success in generating private sector investment and economic activity proved fleeting. Between 2001 and 2012, per capita income increased nearly fivefold, from \$117 in 2001 to a peak of \$669 in 2012. However, these economic gains were driven by lavish spending by the international community and were therefore unsustainable. A list of "stubborn barriers to trade" from SIGAR's 2018 report on private-sector development illustrated the number and diversity of obstacles to organic economic growth: (1) the lack of substantial progress in product diversification, value-added processing, production scalability, and quality control across all sectors; (2) lack of government capacity and infrastructure; (3) lack of productivity; (4) difficulties with customs reform; (5) high staff turnover within the U.S. and international effort to increase Afghan trade capacity; (6) insecurity; (7) poor facilities maintenance; and (8) corruption.²¹⁵ In other words, Afghanistan's licit economy was fundamentally uncompetitive and not positioned, even after two decades of assistance, to become competitive on any realistic timeline envisioned by the United States. As SIGAR summarized little more than two weeks prior to the Taliban takeover in 2021, "Afghanistan remains poor, aid-dependent, and conflict-affected."²¹⁶

As evidence of its dependency, Afghanistan consistently had insufficient domestic revenues to cover government expenditures, a problem solved only with perpetual subsidies in the form of donor grants. This problem worsened as government expenditures steadily increased over time while domestic revenues stagnated.²¹⁷ World Bank data published in April 2021 indicated that, in 2020, the Afghan government received approximately \$8.6 billion in donor grants (covering both security and civilian assistance). That figure was almost four times the amount of Afghan government revenues (approximately \$2.28 billion) and equivalent to nearly 76 percent of total public expenditures.²¹⁸

The 2010 near-collapse of Kabul Bank, the country's largest private bank, underscored the immense challenges to promoting economic growth amidst pervasive corruption and governmental dysfunction. Kabul Bank Chairman Sher Khan Farnood admitted that the bank operated as a massive pyramid scheme: hundreds of millions of dollars had been fraudulently lent to fictitious companies in transactions that benefited politically

connected Afghan shareholders who never paid back those loans. U.S. government funds for Afghan National Army and Afghan National Police salaries regularly moved through Kabul Bank, which used that money to cover customers' withdrawals, concealing the bank's steadily diminishing reserves. Meanwhile, deposits by ordinary Afghan citizens were used to fund the fraudulent loans. Two of the scheme's principal beneficiaries were Mahmoud Karzai and Haseen Fahim—the brothers of President Karzai and Vice President Marshal Mohammed Fahim, respectively. The extent of the theft was estimated to be roughly \$982 million.²¹⁹

Although the Afghan economy experienced growth over the course of American involvement there, ultimately that growth did not translate into substantial reductions in unemployment or poverty.²²⁰ By the end of the U.S. intervention, development standards in Afghanistan remained shockingly low across several critical areas. In 2021, food security conditions deteriorated to alarming levels, with 12.2 million Afghans—one-third of the population—facing “crisis” or “emergency” levels of food insecurity, placing Afghanistan among the three countries with the highest proportion of food-insecure people, alongside Yemen and South Sudan.²²¹ Other humanitarian needs also escalated dramatically, with approximately half of Afghanistan's population requiring aid in 2021—nearly double the number from 2020 and six times higher than just four years earlier.²²² In addition, health outcomes remained among the worst globally. In 2020, Afghanistan had the lowest life expectancy in the world at just 52.1 years.²²³ These dire statistics underscore the failure of development efforts over two decades, revealing a country still struggling with widespread poverty, corruption, and institutional weaknesses despite massive international investment.²²⁴

U.S. Goals for Bringing Democracy and Good Governance to Afghanistan Proved Unrealistic

Establishing democratic elections and enforcing the rule of law was seen as essential to fostering long-term stability and good governance in Afghanistan. The promise of free and fair elections was meant to empower Afghans, giving them a voice in shaping their future and solidifying democratic principles in a nation scarred by decades of war. This vision never materialized.

In its 2021 report, *Elections: Lessons from the U.S. Experience in Afghanistan*, SIGAR found that insecurity alone was a major hurdle to widespread political participation.²²⁵ In addition, Afghan elections were regularly subject to fraud and manipulation through bribes, threats, or both.²²⁶ Ultimately, the elections that did take place were marred by accusations of fraud, low turnout, corruption, and voter manipulation. Far from fostering genuine democracy, these electoral processes often ended with the United States stepping in to broker deals among rival candidates to keep the facade of democracy intact.²²⁷

U.S. strategy documents consistently linked democracy, elections, and popular representation to the overarching goal of a stable and legitimate Afghan government.²²⁸ But Afghans had no experience participating in elections, much less administering them.²²⁹

As U.S. Army War College professor and former provincial reconstruction team political officer, Chris Mason, told SIGAR, “I want to emphasize...just how far-fetched the project in Afghanistan—to try to create a stable Jeffersonian democracy there—was.”²³⁰

Afghanistan’s 2019 presidential election—its last before the collapse of the U.S.-backed government—exemplified the extent of dysfunction. During that election, only an estimated 10 percent of eligible voters went to the polls. Afterward, allegations of fraud at all levels of the electoral process caused a five-month delay in announcing the results. On February 18, 2020, Afghanistan’s Independent Electoral Commission declared President Ashraf Ghani the winner. Ghani’s opponent, Abdullah Abdullah, asserted that he had won the largest number of “clean votes,” as opposed to what he said were fraudulent or irregular votes.²³¹ “The truth,” recounted former Secretary of State Mike Pompeo, “was that Ghani simply had bribed more voters and vote counters than the other candidates had. Now Ghani and Abdullah were fighting about who would be the next president without regard for whether there would even be a government to lead.”²³²

Afghanistan’s previous presidential election in 2014, also contested by Ghani and Abdullah, had been resolved only after Secretary of State John Kerry brokered a deal in which Abdullah was given a position—Chief Executive—with no basis in the Afghan constitution.²³³ Despite U.S. efforts to negotiate another last-minute power-sharing deal, Kabul hosted the spectacle of two parallel presidential inaugurations on March 9, 2020. Senior U.S. officials, including Afghanistan envoy Zalmay Khalilzad and U.S. Forces-Afghanistan Commander General Austin Scott Miller, attended Ghani’s inauguration and snubbed Abdullah’s ceremony, effectively legitimizing Ghani’s victory.²³⁴ Noting low voter turnout, substantial fraud, and the months-long delay in announcing the winner, former U.S. Ambassador to Afghanistan Michael McKinley told SIGAR that the 2019 Afghan presidential election “should have been the biggest red flag on earth that there was no legitimacy to the political system that was in place in Afghanistan.”²³⁵

The U.S. Effort to Establish a Western-style Court System Ran Counter to Afghanistan’s Traditional Justice Norms

Further eroding any meaningful progress toward effective governance, efforts to establish Afghanistan’s justice system were ineffective, thwarted by corruption and a pervasive lack of accountability. Moreover, U.S. officials chose to pursue a vision for Afghanistan’s justice system that reflected American values and preferences, without sufficient regard for what was practical or possible. It was assumed that advocating for a more informal and traditional dispute resolution would have put the United States dangerously close to endorsing outcomes that would have violated Western norms of human rights.²³⁶ The result was a formal court system established through foreign intervention that was slow, corrupt, and foreign to Afghan customs of community-level dispute resolution mechanisms.²³⁷

Often, that system produced exactly the outcomes the U.S. sought to avoid. It was not uncommon, for example, for a woman fleeing an abusive household to wind up being charged with *zina*, having sex outside of marriage—meaning that women encouraged

to seek redress via the formal justice system for domestic abuse or other violent crimes could instead find themselves facing judicial punishment. This common occurrence reflected a broader issue within the justice sector: the Afghan government punishing women and girls for so-called “moral crimes” and acts that have “no grounding in codified law.” According to 2013 estimates from Human Rights Watch, “Half of all women in prison and about 95 percent of girls in juvenile detention in Afghanistan have been arrested on ‘moral crimes’ charges.”²³⁸

The Impunity Enjoyed by U.S.- and Afghan-government Aligned Powerbrokers Undercut Notions of Accountability

The cases of Mohammad Zia Salehi and General Abdul Rashid Dostum reveal the extent to which U.S. and Afghan officials were willing to overlook serious abuses by individuals considered essential to counterterrorism and counterinsurgency efforts. In 2017, while serving as vice president of Afghanistan, Dostum was accused of kidnapping and torturing a political rival. His alleged victim, Ahmad Ishchi, described a brutal ordeal in which he was sodomized with an assault rifle.²³⁹ “As I fell face down on the floor,” Ishchi explained, “it felt like I was unconscious for a few seconds. All of a sudden, I felt a pain that made me involuntarily scream.”²⁴⁰ According to the *New York Times*, Dostum had abducted him, beat him severely, and attempted to rape him, before ordering his guards to sexually assault him with their weapons. “Seven of General Dostum’s guards were sentenced to five years in prison,” the *Times* reported, adding, “Court documents, which presented interviews with dozens of eyewitnesses as part of the evidence, left no doubt that the crime had happened.”²⁴¹

Though Dostum denied the allegations and briefly went into exile in Turkey, he faced no prosecution and later received a military promotion to Marshal, a position only awarded twice before in Afghan history.²⁴² The situation was further compounded when senior American officials, instead of condemning his actions, engaged with him publicly, posing for photographs and presenting him with gifts, including a commander’s coin and a NATO pin.²⁴³ Dostum is the same U.S. ally who is said to have presided over the suffocation of hundreds of Taliban prisoners in shipping containers after they surrendered in November 2001.²⁴⁴

Mohammad Zia Salehi—an aide to President Hamid Karzai—was also above the law. In January 2010, Afghan investigators raided the offices of the New Ansari Money Exchange, a money transfer firm (*hawaladar*) that moved money into and out of Afghanistan. New Ansari was suspected of moving billions of dollars out of Afghanistan for Afghan government officials, drug traffickers, and insurgents. Investigators estimated that as much as \$2.78 billion was taken out of Afghanistan by New Ansari couriers from 2007 to 2010. In the course of the investigation, a wiretap recorded Salehi soliciting a bribe in exchange for obstructing the investigation into New Ansari. In late July 2010, Salehi was arrested. But, within hours of the arrest, President Karzai ordered Salehi’s release and the case was eventually dropped.²⁴⁵

The *New York Times* reported that Salehi, who had once worked for Dostum, was “being paid by the Central Intelligence Agency, according to Afghan and American officials.”²⁴⁶ If true, this would suggest a U.S. intelligence agency was paying an individual as an intelligence asset even as U.S. law enforcement agencies were building a major corruption case against him. Barnett Rubin, Afghanistan expert and former senior advisor to Richard Holbrooke, former Special Representative to Afghanistan and Pakistan, noted that in making such payments for information and collaboration, “One part of U.S. policy corrupted Afghan officials while other parts tried to investigate and root out corruption. Given the interest that defined the mission, concerns about corruption did not trump those of covert action.”²⁴⁷ According to Andrew Natsios, former USAID administrator from 2001 to 2006, “We created a culture of corruption because of the CIA operating system. Our operating systems between the State Department, the CIA, the Defense Department, and USAID clashed hourly, every single day, seven days a week, for 20 years.”²⁴⁸

Despite \$90 Billion Allocated to Afghanistan’s Security Over 20 Years, Afghan Security Forces Collapsed Quickly Without a Sustained U.S. Military Presence

In its 2023 report, *Why the Afghan Security Forces Collapsed*, SIGAR found that despite 20 years and \$90 billion of U.S. support, the U.S. and Afghan governments failed to create an independent and self-sustainable Afghan National Defense and Security Forces (ANDSF).²⁴⁹ Rather, the ANDSF remained reliant on the U.S. military in part because the United States designed the ANDSF as a mirror image of U.S. forces, which required a high degree of professional military sophistication and leadership. This created long-term ANDSF dependencies.²⁵⁰

As a result of those dependencies, the decision to withdraw all U.S. military personnel and dramatically reduce U.S. support to the ANDSF destroyed the morale of Afghan soldiers and police.²⁵¹ The government’s collapse commenced on August 6 with the fall of Zaranj, the capital of Nimroz Province, the first provincial capital taken by the Taliban. A parliament member from the province said the Taliban took control without a fight, as ANDSF and government officials fled into neighboring Iran.²⁵² On August 15, 2021, former President Ghani—long criticized for his ties to the West—boarded a helicopter and fled the country. With that, the two-decade long U.S. effort to transform Afghanistan ended.²⁵³

Despite ANDSF Weaknesses, Senior U.S. Officials Remained Publicly Optimistic in the Months Before the Afghan Government Collapsed

Even as the U.S. military prepared to depart Afghanistan, senior U.S. officials publicly expressed optimism about the ANDSF’s performance. In April 2021, when President Biden announced his decision to complete the U.S. withdrawal, he claimed, “We have trained and equipped a standing force of over 300,000 Afghan personnel today and hundreds of thousands over the past two decades. And they’ll continue to fight valiantly, on behalf of the Afghans, at great cost.”²⁵⁴

In July 2021, President Biden again asserted that Afghan security forces “have 300,000 well-equipped [troops]—as well-equipped as any army in the world—and an air force against something like 75,000 Taliban. [The outcome] is not inevitable.”²⁵⁵ Three days later, Pentagon Press Secretary John Kirby contended that Afghan security forces “know how to defend their country.”²⁵⁶ At the time of this statement half of Afghanistan’s districts were under Taliban control, many having given up without resistance, and about half of Afghanistan’s 34 provincial capitals were threatened.²⁵⁷ On August 9, 2021—just six days before the Afghan government collapsed—Kirby further contended, “I have the proof that [Afghan security forces] have a force of over 300,000 soldiers and police.” “They have a lot of advantages that the Taliban don’t have,” he added.²⁵⁸

The personnel numbers cited by the Biden administration were highly questionable. Prior SIGAR work had highlighted concerns about “ghost” soldiers and police—that is, nonexistent personnel on Afghan security-force payrolls, created so that corrupt officers and officials could pocket their salaries.²⁵⁹ Afghan National Police personnel figures from August 2021 demonstrate just how tenuously the United States grasped the strength of Afghanistan’s security forces. According to DOD-provided data, on June 24, 2021, there were 111,850 Afghan National Police recorded in the security force’s personnel and payroll system, with 96.5 percent present for duty. On August 14, the day before the Afghan government collapsed there were 112,924 police personnel listed in the payroll system, with 93.5 percent present for duty—highly improbable figures given that the Taliban had already seized most of the country.²⁶⁰ “We did not have [a] police and army that amounted to over 300,000. That was all a lie; we never reached those levels,” former Acting Minister of Finance Khalid Payenda told the Afghanistan Analysts Network. “My conclusion right now, [is that] at best, [there were] maybe 40 to 50 thousand. The rest were all ghosts.”²⁶¹



An Afghan Uniform Police instructor (right) shows an officer where in a vehicle to search for weapons or explosives during training at Combat Outpost Matun Hill in Khost Province, Afghanistan. (DOD photo by Sgt. Kimberly Trumbull)

WAS FAILURE INEVITABLE?: MULTIPLE FORMER SENIOR OFFICIALS BELIEVED SUCCESS WAS UNLIKELY

As part of this final report, SIGAR interviewed multiple former senior U.S. officials who had worked on or in Afghanistan at some point during the two-decade long U.S. intervention. Several of these interviewees expressed the view that entrenched challenges in Afghanistan were so pervasive that they precluded any real possibility of success. As former Assistant Secretary of State for South and Central Asian Affairs Richard Boucher said, “I think by [the time of the collapse] I decided it was pretty much inevitable—that our strategy had been flawed all along and we’d never created a government that could hold its own and deliver for its people.”²⁶²

Many of those SIGAR interviewed felt that U.S. efforts in Afghanistan were unlikely to succeed years before the final collapse of the Afghan government. Former U.S. ambassador to Afghanistan (2007–2009), William Wood, told us, “Even in my early days, at least I had a sense that we were kidding ourselves.”²⁶³ Former U.S. ambassador to Afghanistan (2014–2016), Michael McKinley, elaborated, “We were talking about [the collapse of the Afghan government] five years before it happened. I don’t mind telling you it was a minority opinion [that the Afghan government might collapse], but it wasn’t one that was an opinion of two people. There were others in government who saw this as an eroding stalemate.”²⁶⁴ James Dobbins, former U.S. Special Representative for Afghanistan and Pakistan stated, “The option of winning in Afghanistan was probably off the table by 2014 or 2020.”²⁶⁵ Carter Malkasian, former special assistant for strategy to the chairman of the Joint Chiefs of Staff told us that, “My sense was that by 2012, very few people thought that the insurgency could be defeated and that we could leave with the Afghan government fully in control of things.”²⁶⁶

Among those SIGAR interviewed was a shared view that the problems faced were not just temporary setbacks, but fundamental issues that undermined the entire effort. Some interviewees argued that decisions made by the United States in the early years of the intervention—such as partnering with warlords and neglecting to include the Taliban at the Bonn conference—set the course for inevitable failure, embedding flaws that could not be corrected later. Others concluded that success was unlikely based on what they witnessed during their time in the country, citing poor interagency coordination, corruption, and a disconnect between U.S. goals and Afghan realities. Several interviewees contended that the 2020 Doha Agreement, which set the terms for the U.S. withdrawal, ultimately sealed Afghanistan’s fate by undermining the Afghan government’s legitimacy and emboldening the Taliban. Altogether, these perspectives share a belief in the inevitability of failure; they differ only on when failure became unavoidable.

Some Believed That Excluding All Taliban from the Political Process at the Outset Made Future Reconciliation Unlikely

Some interviewees identified critical decisions that, had they been made differently, might have altered the trajectory of the effort and prevented a collapse. One of the most consequential decision points involved the possibility of pursuing early political reconciliation with the Taliban. After 9/11 and the Taliban’s initial removal from power,

the Taliban were excluded from the Bonn Conference and barred from any legitimate participation in Afghan politics. Carter Malkasian observed that “a conference for a political settlement without one of the most important parties seems to have struck no one as odd.”²⁶⁷ In hindsight, several U.S. officials agreed that this exclusion altered the trajectory of the conflict: the Taliban, though militarily defeated and removed from power, maintained politically significant popular support in some regions of the country.²⁶⁸ Former deputy national security advisor for Iraq and Afghanistan Douglas Lute told SIGAR that this exclusion “set the fuse...that essentially slowly burned towards the fall of Kabul in August 2021.”²⁶⁹

Alternatively, as noted by former U.S. Ambassador to Afghanistan Ronald Neumann, “To say it’s a mistake, you have to say, ‘Was it reasonably possible to know it, and was it politically feasible to have done otherwise?’” According to Neumann, in 2002, “the war looked won. The Taliban had basically dissolved. … So, what is the level of foresight required to say that this defeated army somehow still needs to be kept as a political factor?” Calling the exclusion of the Taliban from the post-2001 political order a mistake, Neumann summarized, is equivalent to saying, “I didn’t have perfect foresight for years in the future.”²⁷⁰

Some Viewed the U.S. Decision to Invade Iraq as a Distraction; Others Saw It as Inconsequential to an Already Flawed Mission in Afghanistan

Several interviewees pointed to the invasion of Iraq as a pivotal moment that redirected vital resources and attention away from Afghanistan, fundamentally altering the course of the conflict. As Lt. Gen. David Barno, former senior American commander of U.S. and coalition forces in Afghanistan, noted, “Without the war in Iraq, you would, I think, have had a very different policy outcome in the [Afghanistan] war.”²⁷¹ James Dobbins, former special representative for Afghanistan and Pakistan, echoed this view. Bush administration officials soon “recognized that they had to resource [Iraq or Afghanistan] more substantially, [and] they chose Iraq because the situation there had degenerated more quickly,” he said. The result was that “you had several years of calculated neglect [in Afghanistan]…It was intentional.”²⁷² Similarly, former deputy national security advisor Lute argued that a key inflection point was “somewhere around the point when the Bush administration decided it was going to invade Iraq…All the valuable low-density, high-demand military assets, so Predator orbits, special forces A-teams, brigade combat teams, all these key assets, ISR [intelligence, surveillance and reconnaissance] assets, always went first to Iraq.” Afghanistan, he said, “was always going to be the secondary theater.”²⁷³

Others argued that by the time the Iraq invasion occurred, many of the counterproductive policies in Afghanistan were already in place, suggesting that additional attention and resources might have worsened the situation rather than improved it. As co-director of the Afghanistan Analysts Network Kate Clark noted, “Many people say, ‘Well, if only the Americans kept their eye on the ball and not [gotten] distracted by Iraq it would’ve gone better.’ I actually don’t think so. I think, compared to Iraq, Afghans probably got off lightly at that point, with a lightish American footprint. But the footprint that was there was not helpful.”²⁷⁴ Former U.S. Naval War College professor Jacqueline Hazelton agreed. “Pouring more of the same kind of resources and effort into Afghanistan would only have intensified

the problem,” she said. “It was wrongheaded from start to finish, and more resources would only have made it more wrongheaded and caused more suffering for Afghans.”²⁷⁵

Researchers from Tufts University’s Afghanistan Assumptions Project summarized similar views in their work:

In popular mythology, the US decision to invade Iraq in 2003—and take its proverbial eye off the ball in Afghanistan—was the decisive factor that allowed the Taliban to return. But such arguments ignore what the United States was actually doing in Afghanistan and how its actions spurred the return of the Taliban. America’s errors were not ones of omission, but rather commission.²⁷⁶

Opinions Varied on the U.S. Decision to Withdraw, But Staying Longer Carried Little Guarantee of Success

Finally, many interviewees argued that the United States should have delayed its withdrawal from Afghanistan and maintained a long-term investment of troops and resources to avoid the catastrophe that happened. As former U.S. Secretary of Defense James Mattis told SIGAR, achieving this required a slow drawdown over a “generational timeline.”²⁷⁷ Hugo Llorens, former U.S. special chargé d’affaires for Afghanistan, added that the continued presence of U.S. and NATO allies was both affordable and sustainable, and that there was no immediate need for withdrawal. “There was no victory to be had in the short term,” he said, “but we were on the winning end.” According to Llorens, the South Asia Strategy, if given time, could have driven the Taliban to the negotiating table, potentially leading to a political settlement.²⁷⁸

Others expressed deep frustration with the U.S. decision to withdraw, arguing that it represented a form of self-defeat. According to Ronald Neumann, the United States was not beaten; it simply ran out of political will to continue the mission.²⁷⁹ Andrew Natsios, former USAID administrator, emphasized that a small, continued U.S. presence, similar to the military deployments in Japan or South Korea, would have been sustainable indefinitely.²⁸⁰ Llorens concurred, stating that a long-term presence would have helped stabilize the region and maintain leverage over the Taliban.²⁸¹ For these interviewees, the sudden withdrawal not only undermined years of effort, but also forfeited a potentially stable and sustainable endgame for Afghanistan.

Others disagreed, contending that the strategy was inherently ineffective, and the withdrawal merely expedited the end of an untenable situation. Former U.S. Naval War College professor Jacqueline Hazelton criticized those who spoke of a “generational effort,” saying that such a term implied an outcome that was always out of reach: “People like Petraeus say, ‘Oh, it’s the effort of generations,’ which implies a certain end state that was never attainable in the first place,” she said.²⁸² Former U.S. Ambassador to Afghanistan Michael McKinley sharply criticized the notion that an indefinite U.S. presence could have propped up the Afghan government or prevented the Taliban’s return to power. “Those who argue we could have stayed,” he stated, “just can’t accept that 20 years of an American commitment to Afghanistan was coming to an end in abject failure—or they have blinders on.” Even the argument of a “low-casualty war”

was misleading, he said. “I really find it shocking when people say, ‘Well, they were relatively low-casualty wars.’ Well, they weren’t for Afghans. And I would argue that the [thousands of] dead Americans and 40,000-plus wounded… there’s hundreds of thousands if not a couple of million families in this country who would beg to differ.”²⁸³

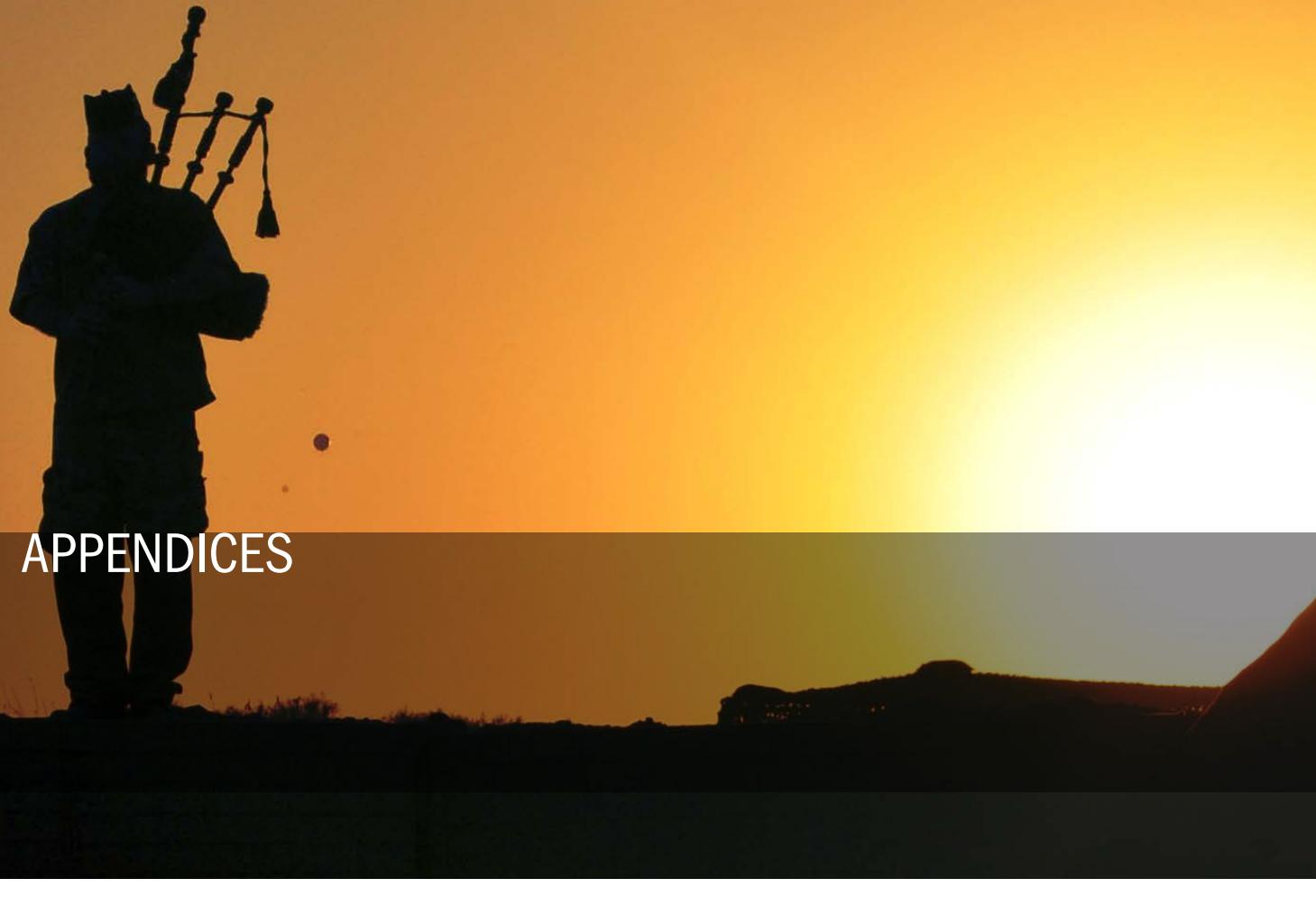
Carter Malkasian is among those who do not believe that staying would have resulted in success. “If we hadn’t said we were going to withdraw, would the Afghan forces have succeeded? There is very little evidence that one could find to support that hypothesis.” He added that “the Taliban were never going to agree with [an extended occupation]. It was never in the cards.”²⁸⁴ Michael Cohen, senior fellow with the Center for Strategic Studies at Tuft’s Fletcher School, called it “absurd” for anyone to claim that staying longer could have led to success. “What makes you think that us staying longer would have prevented that outcome?” he asked. “How much money did we spend? How much training did we provide? It wasn’t going to make any difference at all. And I think the nature of how quickly the government fell after it was clear that we were leaving proves that point.”²⁸⁵ Former Congressman John Tierney also dismissed the belief that the United States could have succeeded with more time: “Unless you were going to go in with about 900,000 or 1,000,000 troops, and take over the country, and colonize it, what the hell do you think you’re doing there?”²⁸⁶

CONCLUSION

The outcome in Afghanistan should serve as a cautionary tale for policymakers contemplating similar reconstruction efforts in the future. If there is one overarching lesson to be learned from a tragedy that unfolded over 20 years, it is that any U.S. mission similar in context, scale, and ambition must confront the real possibility of failure.

When considering whether interventions like Afghanistan’s can succeed, it is important to specify that the comparison applies to similarly ambitious nation-building efforts in underdeveloped, conflict-ridden countries. Unlike past reconstruction efforts in places like post-World War II Europe or Japan where the United States successfully rebuilt countries whose modern economies, industry, and infrastructure had been degraded by war, Afghanistan was a severely underdeveloped state. U.S. efforts there were often trying to create capabilities, systems, and institutions of a type and quality the country had never possessed. As noted by former U.S. Ambassador Ronald Neumann, “We have an American approach to this, which is absolutely repeatable from Vietnam, to Iraq, to Afghanistan. Where the locals won’t do it, we will come up with a plan, and then we will try to sell it to you. And we have an almost perfect record of failure.”²⁸⁷

In sum, the U.S. experience in Afghanistan demonstrates the need for sober assessment of what is genuinely achievable and what, conversely, may be beyond the reach of external intervention. Moreover, those tasked with deriving lessons from such endeavors should be wary of assuming that improvements in technique or tweaks in strategy can compensate for fundamental flaws in a mission’s premise. Without a realistic understanding of, and respect for, the constraints inherent in these situations, attempts to “fix” or refine the approach risk repeating the same mistakes while expecting a different outcome.



APPENDICES

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This report presents SIGAR's concluding thoughts on the more than 20-year-long U.S. reconstruction effort in Afghanistan. The report highlights key findings, trends, and failures documented by SIGAR over the course of its 17-year existence. It compiles and presents themes found in the varied products issued by SIGAR's numerous directorates, including audit reports, inspection and evaluation reports, investigations, special projects, lessons-learned and quarterly reports, high-risk lists, congressional testimony, speeches, and other products, as applicable. The report incorporates contributions from across SIGAR, including its Audits and Inspections (A&I), Investigations (INV), Research and Analysis (RAD), and Lessons Learned Program (LLP) directorates, as well as the agency's senior leadership.

SIGAR's authorizing statute, the 2008 National Defense Authorization Act, states, "The Inspector General shall, prior to the termination of the Office of the Special Inspector General for Afghanistan Reconstruction ... prepare and submit to the appropriate congressional committees a final forensic audit report on programs and operations funded with amounts appropriated or otherwise made available for the reconstruction of Afghanistan."²⁸⁸ In this report, SIGAR fulfills that statutory requirement. Additionally, SIGAR describes obstacles encountered and best practices developed while conducting oversight during an active conflict, including guidance for conducting investigations and prosecutions in contingency environments.

A man plays the bagpipes as a shura concludes and the local Afghan villagers head home in Lashkar Gah, Helmand Province. (Resolute Support photo)

SIGAR focused on the entirety of the U.S. reconstruction effort in Afghanistan, from September 2001 to September 2025. SIGAR's objectives were to:

1. Determine the total amount of waste, fraud, and abuse identified in SIGAR's published products and closed investigations.
2. Summarize the Audit and Inspection Directorate's oversight of U.S. reconstruction efforts in Afghanistan.
3. Identify and summarize the challenges and best practices for conducting investigations and prosecutions in Afghanistan.
4. Identify and summarize the outcomes and final lessons of U.S. efforts to reconstruct Afghanistan.

SIGAR conducted its work for this report in Arlington, Virginia, and via virtual telecommunication methods from January 2024 through September 2025. Although SIGAR does not consider this unique, final report to be a traditional evaluation, it nonetheless conducted research in accordance with the *Quality Standards for Inspection and Evaluation*, published by the Council of the Inspectors General on Integrity and Efficiency. Those standards require that SIGAR plan and perform research to obtain sufficient, appropriate evidence to provide a reasonable basis for findings and conclusions based on objectives. SIGAR believes that the evidence obtained provides a reasonable basis for its findings and conclusions. SIGAR conducted its work under the authority of Public Law No. 110-181, as amended, and the Inspector General Act of 1978, as amended.

Below, SIGAR presents further information about the methodologies employed to meet each report objective.

Objective 1: Determine the Total Amount of Waste, Fraud, and Abuse Identified in SIGAR's Published Products and Closed Investigations

SIGAR's first objective was to identify and summarize the total amount of waste, fraud, and abuse identified in SIGAR's published products and closed investigations. To achieve this objective, SIGAR reviewed its published reports and closed investigations, and compiled information on the total dollar amounts of waste, fraud, and abuse, and the total dollar amount of cost savings from SIGAR's recommendations.

To ensure accuracy and completeness of compiled information, SIGAR incorporated various processes to ensure it compiled and analyzed information consistently and accurately. First, SIGAR utilized standard terminology and definitions from GAO's Government Auditing Standards, known as the Yellow Book, as well as prior SIGAR reports, to define waste, fraud, abuse. Second, SIGAR used standardized input prompts to ensure compiled information was captured consistently in order to eliminate the risk of inconsistent data entry inputs. Lastly, SIGAR incorporated several levels of reviews in data entry and analysis. Compiled data inputs were reviewed to ensure (1) the accuracy of the compiled data, (2) all of a report's findings were identified, (3) the accuracy of each report's data input analysis on whether a finding was due to an internal control weakness, and (4) the accuracy of the categorization of each internal control weakness. In instances

where SIGAR's review identified inaccuracies, SIGAR performed an additional review to ensure the accuracy of the compiled information and its analysis of it.

To determine the total amount of waste, fraud, and abuse identified in its reports, SIGAR followed the methodology used in its 2018 and 2020 waste reports.²⁸⁹ SIGAR created an integrated project team of auditors, investigators, and program analysts to analyze SIGAR's performance audit, evaluation, inspection, special project, alert letter, and lessons learned reports issued since SIGAR's inception, as well as 659 closed investigations. SIGAR also used the definitions of waste, fraud, and abuse developed by GAO in its 2018 Yellow Book, which were the same definitions used in its 2018 and 2020 waste reports. GAO's definitions of waste, fraud, and abuse are listed in Table 11 below.

TABLE 11

GAO DEFINITIONS OF WASTE, FRAUD, AND ABUSE	
Waste (2018 Version)	Waste is the act of using or expending resources carelessly, extravagantly, or to no purpose. Importantly, waste can include activities that do not include abuse and does not necessarily involve a violation of law. Rather, waste relates primarily to mismanagement, inappropriate actions, and inadequate oversight.
Fraud	Fraud is the act of obtaining something of value through willful misrepresentation. Whether an act is, in fact, fraud is determined through the judicial or other adjudicative system and is beyond an auditor's professional responsibility.
Abuse	Behavior that is deficient or improper when compared with behavior that a prudent person would consider a reasonable and necessary business practice given the facts and circumstances, but excludes fraud and noncompliance with provisions of laws, regulations, contracts, and grant agreements. Abuse also includes misuse of authority or position for personal financial interests or those of an immediate or close family member or business associate. Because the determination of abuse is subjective, auditors are not required to perform procedures to detect abuse in performance audits. Auditors may discover that the abuse is indicative of potential fraud or noncompliance with provisions of laws, regulations, contracts, and grant agreements.

Source: GAO, *Government Auditing Standards 2018 Revision*, GAO-15-5686, July 17, 2018.

In keeping with its 2018 and 2020 waste reports' methodologies, SIGAR quantified the amount of waste, fraud, and abuse associated with each instance using a dollar range to capture the minimum amount and maximum amount of funds subjected to waste, fraud, or abuse. According to GAO, waste, fraud, and abuse can be the result of noncompliance, failures in internal control, or the result of decisions that are contrary to existing policies. As a result, waste, fraud, and abuse may not always have an associated dollar value.

Objective 2: Summarize the Audits and Inspections Directorate's Oversight of U.S. Reconstruction Efforts in Afghanistan

SIGAR's second objective was to summarize the Audit and Inspection (A&I) Directorate's oversight of U.S. reconstruction efforts in Afghanistan, to include identified systemic internal control weaknesses, generated cost savings to U.S. taxpayers, status of report recommendations, identified operational challenges, and recommendations to improve the efficiency and effectiveness for oversight on future U.S. reconstruction efforts. The scope of this objective included reports issued by SIGAR's A&I Directorate through September 2025. This portion of the report draws information and data from (1) SIGAR's issued reports, (2) congressional testimony, (3) SIGAR internal policies and procedures, and (4) interviews of current and former A&I personnel.

To summarize how the directorate provided oversight over U.S. reconstruction funds, it first compiled a compendium of the directorate's products, such as performance audit reports, evaluation reports, inspection reports, and financial audit reports. For each audit product within the compendium, SIGAR determined which reconstruction sector the product provided oversight of. To determine the total number of products published by reconstruction sector, SIGAR summarized its compendium by reconstruction sector and then by product type. To summarize the total dollar amount of incurred costs SIGAR's financial audits reviewed by sector, SIGAR also included the amount of incurred costs audited, total value of the awards examined, and the total amount of costs questioned.

To summarize the narratives of how the directorate provided oversight over each reconstruction sector, SIGAR examined each product within each reconstruction sector and judgmentally selected products that highlighted A&I's work. The narratives included in each reconstruction sector were extracted and summarized from the respective published product. For the purposes of this report, A&I presented its performance type reports separately from its financial audit reports to highlight how the directorate provided different types of oversight over each reconstruction sector.

To determine the amount of potential cost savings generated by A&I's recommendations, SIGAR collected information from (1) the recommendation follow-up data file maintained by SIGAR's Quality Management directorate, and (2) a review of SIGAR's reports identified cost savings. The recommendation follow-up file contains information on how much money a U.S. agency saved or recovered by implementing the directorate's recommendations, as determined by the respective U.S. agency. For example, a report resulted in DOD reducing its purchase of a C-130 cargo airplane, which DOD valued at \$40 million. As such, SIGAR used DOD's assessed value to calculate the cost savings to the U.S. taxpayer by implementing SIGAR's recommendation. In another example, a U.S. agency may have said it recovered a specific dollar amount by implementing SIGAR's recommendation, which SIGAR records as a cost savings. In the second method, SIGAR used a value as determined by the first method, and then extrapolated the amount through an award's lifecycle or through 2021, when the Afghan government collapsed, as appropriate. For example, in one report DOD assessed implementing a SIGAR recommendation resulted in saving the agency \$5.5 million in maintenance costs per annum for a specific award. Using DOD's assessed annual savings, SIGAR extrapolated the annual savings amount through the end of the award's period of performance, resulting in an amount larger than \$16.5 million.

To identify the systemic internal control weaknesses within the directorate's products, SIGAR reviewed its issued performance audit and evaluation reports, and compiled information on each finding within each report and then determined whether that finding was due to one or more internal control weaknesses. To ensure accuracy and completeness of compiled information, SIGAR incorporated various quality control processes. First, SIGAR used standard terminology and definitions from GAO's *Standards for Internal Control in the Federal Government*, known as the Green Book, as well as prior SIGAR reports, to define internal controls, internal control deficiencies,

and the categories of internal controls within an internal control environment. In keeping with its 2020 waste report, SIGAR used the same internal control categories and used professional judgment to categorize each internal control weakness into one of the six categories: (1) planning and contracting, (2) oversight and monitoring, (3) capacity building, (4) mismanagement, (5) information quality and data reliability, and (6) judicious spending of funds.²⁹⁰ Subsequently, SIGAR determined which internal control objectives—compliance, reporting, or operations—were impacted as a result of the internal control weakness. SIGAR then summarized the compiled information and analyses, which serves as the basis for its findings.

Second, SIGAR used standardized data input prompts to ensure compiled information was captured consistently. Additionally, to avoid entering duplicative report findings and any associated internal control weaknesses, SIGAR categorized reports that examined more than one agency as “Multiple” so a finding and any associated internal control weaknesses would not be entered for each agency examined. To determine the monetary value of identified internal control weaknesses, SIGAR noted whether identified internal control weaknesses had a monetary impact. If the finding had a monetary impact, SIGAR determined whether the impact was “known” or “unknown,” and the amount if known.²⁹¹

Lastly, SIGAR incorporated several levels of reviews on data inputs and analyses. Compiled data inputs were reviewed to ensure (1) the accuracy of the compiled data, (2) all of a report’s findings were identified, (3) the accuracy of each report’s data input analysis on whether a finding was due to an internal control weakness, and (4) the accuracy of the categorization of each internal control weakness. In instances where its review identified inaccuracies, SIGAR performed an additional review to ensure the accuracy of the compiled information and the analysis of it.

To summarize the recommendations made by SIGAR products, and their statuses, SIGAR collected information from the recommendation follow-up data file maintained by SIGAR’s Quality Management directorate, including the number of recommendations made to respective U.S. agencies, the statuses of those recommendations as of September 2025, and the duration of time U.S. agencies took to close their respective recommendations. Additionally, SIGAR summarized the findings from its prior reports that examined recommendations made to DOD, State, and USAID.²⁹²

To summarize the challenges of providing oversight on U.S. reconstruction efforts and make recommendations for future efforts, A&I interviewed 21 current and former directorate personnel using a standardized set of questions pertaining to the challenges of performing oversight in a contingency environment, and reviewed the directorate’s reports to identify the challenges directorate personnel faced and how those obstacles were overcome.

Objective 3: Identify and Summarize the Challenges and Best Practices for Conducting Investigations and Prosecutions in Afghanistan

SIGAR's third objective was to identify and summarize the challenges and best practices for conducting investigations and prosecutions in Afghanistan. The objective's scope was from SIGAR's inception in 2008 until September 2025.

To meet this objective, SIGAR first reviewed SIGAR's enabling legislation, the Inspector General Act of 1978, and relevant U.S. Department of Justice manuals to determine the authorities, duties, and responsibilities attributed to SIGAR/INV to conduct investigations in Afghanistan. Then, in consultation with Investigations Directorate management, SIGAR judgmentally selected a sample of 12 SIGAR/INV cases that management believed illustrated the directorate's investigative work in Afghanistan.

SIGAR analyzed each case to determine whether it implicated challenges and/or best practices for conducting investigations in Afghanistan and for the prosecution of those cases. To do so, for each case, SIGAR answered the following questions based on a review of information contained in the Investigations Case Management System and, as necessary, interviews with the case agents:

- What prompted the opening of the investigation?
- What allegation(s) of criminal wrongdoing were investigated?
- Who were the targets of the investigation?
- Who conducted the investigation and how was it supported (agents, prosecutors, support staff)?
- What witnesses were interviewed and how cooperative were they?
- What investigative tools were employed (e.g., searches, surveillance, production of documents, forensic analysis of financial data, Mutual Legal Assistance in Criminal Matters Treaties [MLATs])?
- What was the objective of the investigation (e.g., criminal prosecution, exposure of wrongdoing and deterrence, debarment of contractors, recovery of assets)?
- What degree of cooperation or obstruction did the investigators receive or encounter from the Afghan government; U.S. agencies; the private sector; the U.S. military; allied governments; or any other entity with an interest in the investigation?
- Were there major obstacles to the investigation?
- What were the results in each case (e.g., convictions; assets recovered; case closed without result)?

SIGAR then compiled a list of those cases that achieved their objective(s). SIGAR considered these cases to have been successful. Subsequently, SIGAR analyzed, in consultation with SIGAR/INV management, the cases that met their objective(s) to determine best practices for conducting investigations in Afghanistan. SIGAR engaged in a similar process for cases that did not achieve their objective(s). SIGAR analyzed those cases for which objectives were not achieved to determine the major obstacles to conducting successful investigations in Afghanistan.

Objective 4: Identify and Summarize the Outcomes and Final Lessons of U.S. Efforts to Reconstruct Afghanistan

SIGAR's fourth objective was to identify and summarize the outcomes and final lessons of U.S. efforts to reconstruct Afghanistan. This section of the report had a broad time-scope: the entirety of the U.S. reconstruction effort in Afghanistan, from September 2001 through September 2025. However, it focused primarily on the strategic level of U.S. reconstruction rather than on individual programs or projects, except to the extent that the outcomes of individual programs and projects could be used to illustrate broader reflections, lessons, and observations.

To meet the objective, a team from SIGAR's Lessons Learned Program pursued four researchable questions. Specifically, the team sought to identify (1) the material outcomes, if any, the United States achieved from its reconstruction effort in Afghanistan, benchmarked against its strategic objectives; (2) whether the collapse of the Afghan government and its security forces in August 2021 was overdetermined;²⁹³ (3) the most material lessons from Afghanistan that could be applied to future U.S. reconstruction efforts; and (4) the impact, if any, that SIGAR had on the decisions and events that culminated in the outcome of August 2021.

This portion of the report draws from three categories of sources: (1) SIGAR's issued work, such as its previous compendium report *What We Need to Learn* and other lessons-learned products, (2) new interviews with former senior U.S. officials and other direct participants in, or close observers of, the U.S. reconstruction effort in Afghanistan, and (3) relevant scholarly work, congressional testimony and legislation, and press reporting.

In order to benchmark and contextualize the outcomes and final lessons of U.S. efforts to reconstruct Afghanistan, SIGAR first identified the U.S. government's strategic reconstruction goals. To do so, SIGAR relied on an already tested approach developed for the report *Why the Afghan Government Collapsed*. Using judgmental sampling, SIGAR selected nine U.S. strategic documents that articulated interagency goals. Those were the following:

- Afghanistan Freedom Support Act of 2002, Pub. L. No. 107-327, 22 U.S.C. § 7501(2002).
- U.S. Department of State (State) and U.S. Agency for International Development (USAID), Publication 11084, *Strategic Plan Fiscal Years 2004–2009*, August 2003.
- State and USAID, *Strategic Plan Fiscal Years 2007–2012*, May 7, 2007.
- U.S. Embassy Kabul and U.S. Forces–Afghanistan (USFOR-A), *United States Government Integrated Civilian-Military Campaign Plan for Support to Afghanistan*, February 2011.
- U.S. Embassy Kabul and USFOR-A, *Civil-Military Strategic Framework*, March 2012.
- U.S. Embassy Kabul and USFOR-A, *United States Government Integrated Civilian-Military Campaign Plan for Support to Afghanistan*, August 2013.
- State, *Integrated Country Strategy*, 2014
- State, *Integrated Country Strategy*, 2020
- State, *Integrated Country Strategy*, 2023

SIGAR selected these criteria documents to achieve maximum time coverage of strategic reconstruction objectives over the 20-year U.S. intervention in Afghanistan, with priority given to joint documents capturing the goals of multiple agencies. In its selection, SIGAR sought to minimize the amount of time overlap between documents and focused on those pertaining solely to U.S. agencies instead of agreements, declarations or plans between the United States and international partners. SIGAR determined that, overall, the United States sought to build stable, democratic, representative, gender-sensitive, and accountable governance institutions in Afghanistan. SIGAR assessed that this overarching goal did not materially change from 2002 to 2021. To determine U.S. goals following the collapse of the Afghan government in August 2021, SIGAR relied on State's Integrated Country Strategy for 2023.

Using professional judgment and accumulated institutional knowledge, SIGAR then identified prior SIGAR reports that synthesized data and information relevant to the report's first objective. SIGAR based its assessment of whether individual reports were relevant on the extent to which they spoke to the material outcomes of the U.S. reconstruction effort and the question of overdetermination, synthesized lessons learned, and presented information on the results of SIGAR's work. SIGAR considered reports issued by SIGAR from October 30, 2008 (the date on which SIGAR published its first quarterly report to Congress), to July 30, 2025 (the date of SIGAR's most recent quarterly report at the time this report was finalized).

Once it established what U.S. strategic reconstruction goals were in Afghanistan, SIGAR examined the prior SIGAR reports selected for reconstruction outcomes identified by SIGAR to date. SIGAR also used these reports to compile a narrative timeline of the U.S. reconstruction effort in Afghanistan and relied on them for context and comparison points for the views of interviewees.

Much of the report's documentary evidence consisted of previous SIGAR products. However, these reports rely on data and information from numerous other entities and individuals, including reporting and responses to SIGAR requests for information from U.S. government agencies involved in reconstruction; nonprofit, nongovernmental, and international organizations; various publications that provide insight into the U.S. war in Afghanistan; other U.S. government research and oversight institutions such as the Government Accountability Office and the Congressional Research Service; Afghan government reporting; and previous SIGAR interviews with U.S. and Afghan officials. Information on the scope and methodology for SIGAR's prior work summarized in this report can be found in the reports cited.

To expand the report's evidence base for complete coverage of the U.S. reconstruction effort in Afghanistan, including the early years before SIGAR came into existence and the post-collapse period (for which comprehensive SIGAR reports are fewer), SIGAR included in its analysis judgmentally selected books and articles authored by area experts and academics published from 2001 through 2024. For example, SIGAR drew from work produced by the Afghanistan Assumptions Project at Tufts University, and

from various histories of the U.S. effort in Afghanistan, such as *The American War in Afghanistan* by historian and former U.S. official Carter Malkasian. In selecting these works, SIGAR relied on the professional judgment of a team with considerable collective experience working on Afghanistan and conducting research related to it.

In addition to reviewing the reports and other publications described above, SIGAR conducted interviews with 11 former U.S. senior leaders from State, USAID, and DOD, two former members of Congress, one former senior analyst from the Congressional Research Service, one European diplomat, three academics, three researchers from the Tufts University-affiliated Afghanistan Assumptions Project, and policy analysts with the Stimson Center, the Quincy Institute, and the Center for Global Development—Washington, DC-based think tanks with expertise on Afghanistan reconstruction.

The interviews, conducted from April to July 2024, solicited reflections on the value of oversight for the U.S. reconstruction effort, and the specific contributions made by SIGAR. The interviews also focused on the broader theme of whether the U.S. failure in Afghanistan was overdetermined, benchmarked against overarching U.S. goals. SIGAR conducted its interviews in a semi-structured format that allowed for seeking interviewee responses to predetermined questions while also giving interviewers the opportunity to flexibly ask follow-up questions.

SIGAR initiated the interview process by compiling a list of former senior U.S. officials from State, DOD, USAID, and the National Security Council (NSC) who were materially involved as decision-makers in the U.S. reconstruction effort in Afghanistan. The list included former senior military commanders, U.S. ambassadors to Afghanistan, and USAID mission directors, among others. The team aggregated available contact information for these former senior U.S. officials by: (1) identifying contact information for such officials that existed within SIGAR, and (2) identifying publicly accessible contact information for the officials. SIGAR sent an invitation to participate in SIGAR's final report to all such former senior U.S. officials for whom SIGAR was able to obtain contact information.

SIGAR interviewed all former U.S. officials who responded to the invitation to participate in the report to collect their insights on the overall reconstruction effort, the shortcomings and successes of the effort, the lessons they think should be learned, and the impacts, if any, of SIGAR and other oversight organizations. For the purposes of this report, the impact of SIGAR and other oversight organizations is defined as the extent to which the work of SIGAR and those organizations influenced the thinking and decision-making of former U.S. officials and others who were involved in, or were observers of, the U.S. reconstruction effort.

SIGAR supplemented these interviews of former U.S. officials by interviewing judgmentally selected area specialists and academics. These included individuals who had publicly commented on SIGAR's work in opinion pieces and press reports.

Additionally, the team reached out to selected European officials for their reflections on SIGAR. Only one official accepted SIGAR's invitation to interview.

SIGAR also developed a list of former members of Congress who could speak to SIGAR's impact. Two of the former members responded to SIGAR's invitation and were subsequently interviewed. The intent of these interviews was to gain a more detailed understanding of how SIGAR's work impacted Congressional oversight of the U.S. reconstruction effort.

SIGAR then compared the results of its documentary analysis against the information it gathered from these interviews to refine its understanding of the central lessons of the U.S. reconstruction experience in Afghanistan.

APPENDIX B: SELECT BIBLIOGRAPHY

Over the course of its operation, SIGAR issued nearly 900 reports, including performance and financial audits, inspections, evaluations, high-risk lists, congressional testimonies, quarterly reports to Congress, and lessons-learned reports. Some of this work is listed below:

SIGAR Reports

- SIGAR. *A Broken Aid System: Delivering U.S. Assistance to Taliban Controlled Afghanistan*. SIGAR 25-29-LL. 2025. <https://www.sigar.mil/Reports/Article-Display/Article/4273547/a-broken-aid-system-delivering-us-assistance-to-taliban-controlled-afghanistan/>.
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APPENDIX C: SIGAR WAS RECOGNIZED FOR COURAGE AND EXCELLENCE

Since its inception, SIGAR has been recognized for the impact and excellence of its work by the Council of the Inspectors General on Integrity and Efficiency (CIGIE). CIGIE was established by Congress in 2008 to promote professionalism and coordination among the more than 70 Offices of Inspectors General in the federal government. Each year, CIGIE recognizes the achievements of these offices in a variety of award categories. Some special award categories include the “Sentner Award for Dedication and Courage” for demonstrated selflessness, dedication to duty, or courage. Another special category award is the “Glenn/Roth Award for Exemplary Service” to recognize work of significant value to Congress. Most CIGIE awards are “Awards for Excellence” for achievements that are substantive and meaningful to an individual agency or across the Inspector General community and illustrate a high level of skill, dedication, and impact. These excellence awards can be in one of 13 categories, including audits, investigations, evaluations, inspections, multiple disciplines, and special acts not covered in the 13 areas.

SIGAR was honored with 34 CIGIE awards from 2010 to 2024, including 5 special category awards. CIGIE also recognized SIGAR with 29 awards for excellence to teams and individuals for a broad range of initiatives and products, including audits, inspections, evaluations, investigations, lessons learned, and quarterly reports.

CIGIE Recognized SIGAR with 5 Special Awards for Courage and Service to Congress

CIGIE honored SIGAR staff with four Sentner awards for courage, selflessness, and dedication to duty:

- In 2011, Senior Audit Manager Albert Huntington, Auditor-in-Charge Milton Naumann, and Program Analyst Paula Braun demonstrated exemplary performance in a harsh and unsafe environment while examining Commander’s Emergency Response Program projects in Laghman province.
- In 2013, Special Agent Peter Hughes was honored for courage and uncommon selflessness in detecting contractor fraud that caused widespread security vulnerabilities and enabled roadside bombings in Afghanistan.
- In 2014, for courage under fire while defending the U.S. consulate in Herat, Special Agent Jeffrey Millsagle received both the U.S. Department of State Award for Heroism and the CIGIE Sentner Award for Dedication and Courage. Millsagle had previously survived a separate, very serious coordinated attack while stationed by SIGAR at a military base in Khost Province in Eastern Afghanistan.
- In 2015, four SIGAR auditors and three special agents were recognized for courage, uncommon selflessness, and dedication to duty in a kinetic environment conducting audit and investigative work to support the Afghan government in developing its revenue collection capability to improve its long-term sustainability.

In addition, in 2018, CIGIE awarded the Glenn/Roth Award for Exemplary Service to recognize audit and staff who responded to congressional inquiries on implementation of the “Leahy Laws” and allegations of sexual assault by Afghan security forces. As a result, Congress enacted new legislation for improved incident reporting to help safeguard Afghan children.

SIGAR Was Honored with 29 Awards for Excellence

Much of SIGAR’s audit and investigations work has focused on the provision of military and economic assistance and anti-corruption efforts, areas in which SIGAR had the greatest impact. In addition, SIGAR has been recognized for its innovative approaches to providing quarterly information to Congress and developing a broad, whole-of-government analysis of U.S. assistance to Afghanistan through its Lesson Learned program. In total, SIGAR received 11 awards for excellence in audits, 9 awards for excellence in investigations, and 9 awards for excellence in various other categories, as described below.

Awards for Excellence in Audits

- 2010 – for strengthening Afghanistan’s High Office of Oversight
- 2011 – for ensuring effective use of resources and minimizing potential waste of \$11.4 billion to construct nearly 900 Afghanistan National Security Forces facilities
- 2012 – for identifying actions to improve DOD’s accountability for more than 52,000 vehicles that were provided to the Afghan security forces and valued at \$4 billion
- 2013 – for identifying actions to prevent the waste of millions of dollars to maintain destroyed or missing vehicles used by the Afghan National Police
- 2014 – for identifying millions of dollars in taxes inappropriately levied on U.S. contractors supporting reconstruction programs in Afghanistan
- 2014 – for identifying oversight weaknesses and enhancing efficiency and effectiveness of spending \$772 million to operate, maintain, and sustain Afghanistan’s Special Missions Wing
- 2016 – for identifying weaknesses and challenges in planning, executing, and sustaining \$488 million in U.S. investments to improve Afghanistan’s extractives industry
- 2018 – for identifying mismanagement of a \$60 million power system that provided no tangible benefits to one million Afghans and wasted U.S. government funds
- 2019 – for assessing the Afghan government’s implementation of its national anti-corruption strategy and ministries’ action plans
- 2020 – for continuing assessments of the Afghan government’s implementation of its national anti-corruption strategy and ministries’ action plans
- 2020 – for providing critical information for congressional decision-making and saving more than \$460 million in the UH-60 helicopter program in Afghanistan

Awards for Excellence in Investigations

- 2012 – for investigating and successfully prosecuting a scheme to defraud to defraud the U.S. government in Afghanistan, disrupting a heroin smuggling operation, and enhancing the public’s confidence in government to detect fraud

- 2015 – for mitigating fraud related to an Afghan fuel contract worth almost \$1 billion, resulting in immediate action by the Afghan president saving more than \$200 million in U.S. government funds
- 2015 – for a joint investigation leading to the recovery of \$31.5 million for the U.S. government due to false billings and overcharges for Afghan goods
- 2016 – for exceptional collaboration with federal investigative agencies to successfully detect a fuel theft scheme leading to multiple prosecutions and \$26.8 million in penalties and seizures
- 2017 – exemplary multi-agency team performance in investigating the theft of 700,000 gallons of fuel in Afghanistan, resulting in more than \$5 million in court-ordered restitution civil monetary settlement
- 2019 – outstanding team performance of multiple law enforcement agencies and legal sections working in parallel criminal, civil, and administrative proceedings that resulted in forfeiture of more than \$25 million and several debarments for 20 years
- 2020 – outstanding team performance by multiple agencies resulting in a \$45 million settlement and \$500,000 in fines
- 2021 – exemplary team performance by SIGAR, the Federal Bureau of Investigations, and the Department of Justice in investigating the criminal actions of Adam Doost related to the mining and extractives sector in Afghanistan

Awards for Excellence in Special Acts for Quarterly Reports, Financial Audits, and Lessons Learned Initiatives

- 2014 – recognition for SIGAR’s quarterly report team for providing comprehensive data and timely analysis needed by Congress to oversee more than \$103 billion for rebuilding Afghanistan and make informed decisions to mitigate fraud, waste, and abuse
- 2014 – recognition for General Counsel staff in developing and implementing a comprehensive suspension and debarment program, resulting in hundreds of referrals and debarments over a 3-year period
- 2015 – to the financial audits team in recognition of extraordinary initiative in identifying gaps in financial audit coverage of Afghanistan reconstruction contracts, resulting in potential recoveries exceeding \$100 million in U.S. government funds
- 2016 – the quarterly report team was again recognized for providing a sustained source of comprehensive data and analysis needed by Congress to oversee \$113 billion for the reconstruction effort in Afghanistan
- 2018 – identifying lesson learned during the 17-year, \$70 billion U.S. security assistance program in Afghanistan
- 2019 – in recognition of the Lessons Learned Program which identified lessons learned by taking a longer-range, broader-scope, whole-of-government approach which influenced U.S. policy, doctrine, and legislation
- 2020 – SIGAR’s Lessons Learned Program was again recognized for identifying lessons learned by taking a longer range, broader scope, whole of government approach which influenced U.S. policy, doctrine, and legislation.

Award for Excellence in Multi-Disciplines

- 2013 – exceptional collaboration in conducting audits, investigations, and special projects to prevent waste and theft of billions of dollars in fuel in Afghanistan

Award for Excellence in Evaluations

- 2020 – SIGAR analysts and engineers recognized for a portfolio of inspections leading to significant outcomes related to Afghanistan’s power sector

میر مقتش ویژه برای بازسازی افغانستان



غاؤنی لپاره د خانگری میر مقتش (د افغانستان)

ENDNOTES

- 1 National Defense Authorization Act for Fiscal Year 2008, Pub. L. No. 110-181, 122 Stat. 385 (2008).
- 2 National Defense Authorization Act for Fiscal Year 2008, Pub. L. No. 110-181, 122 Stat. 378 (2008).
- 3 As in prior waste reports, SIGAR quantified the amount of waste, fraud, and abuse associated with each instance, using a dollar range to capture the minimum amount and maximum amount of funds believed to be subject to waste, fraud, or abuse, as identified instances are not always quantifiable with an exact dollar value. Additionally, since waste can be the result of noncompliance with laws or policies, failures in internal control, or the result of decisions that are contrary to existing policies, identified instances of waste may not always have an associated dollar value.
- 4 This number excludes 153 recommendations made in SIGAR's lessons-learned reports.
- 5 White House, "National Security Strategy of the United States of America," September 2002.
- 6 SIGAR, *What We Need to Learn: Lessons from Twenty Years of Afghanistan Reconstruction*, SIGAR 21-46-LL, August, 2021, pp. viii–xi.
- 7 National Defense Authorization Act for Fiscal Year 2008, Pub. L. No. 110-181, 122 Stat. 385 (2008).
- 8 National Defense Authorization Act for Fiscal Year 2008, Pub. L. No. 110-181, § 1229.
- 9 This does not include funds expended for U.S. warfighting. The latter is within the jurisdiction of the DOD Inspector General.
- 10 5 U.S.C. § 401, *et seq.*
- 11 Total reconstruction funding includes \$16.3 billion appropriated for agency operations, of which the largest account was diplomatic programs (\$12.0 billion), and includes funding for SIGAR and other oversight entities.
- 12 Security-related reconstruction funding is distinct from U.S. warfighting funding and is defined by statute to include efforts "to establish or reestablish a political or societal institution of Afghanistan," such as the Afghan National Defense and Security Forces. Pub. L. No. 110-181, § 1229(i)(2); SIGAR, *Quarterly Report to the United States Congress*, SIGAR-2025-QR-3, July 30, 2025, pp. 84–86.
- 13 SIGAR, *Quarterly Report to the United States Congress*, SIGAR-2014-QR-3, July 30, 2014, p. 4.
- 14 SIGAR, *Quarterly Report*, SIGAR-2014-QR-3, p. 4.
- 15 SIGAR, *Quarterly Report*, SIGAR-2025-QR-3, p. 85.
- 16 In addition to appropriated monies, the United States transferred \$3.5 billion in Afghan central bank reserves to the Fund for the Afghan People (Afghan Fund), based in Switzerland. Although no disbursements to benefit the Afghan people have yet been made, the Fund is intended to protect macro financial stability on behalf of the Afghan people, such as recapitalizing Afghanistan's central bank, making debt payments to international financial institutions to preserve Afghanistan's eligibility for development assistance, and paying for critically needed imports. SIGAR, *Quarterly Report*, SIGAR-2025-QR-3, pp. 84–86; SIGAR, *Afghan Fund Inquiry: Response to the U.S. House Foreign Affairs Committee*, SIGAR-24-07-LL, January 4, 2024.
- 17 SIGAR, *Quarterly Report*, SIGAR-2025-QR-3, pp. 73, 85.
- 18 SIGAR, *Quarterly Report to the United States Congress*, SIGAR-2021-QR-3, July 30, 2021, p. 35. The SMW was a special operations wing of the ASSF and flew counterterrorism and counternarcotics missions. SIGAR, *Afghan Air Forces: The U.S. Has Reduced its Advising for Vetting AAF and SMW Recruits and the Afghan Ministry of Defense Does Not Have the Resources Needed to Vet All Recruits or Personnel*, SIGAR 21-03-AR, April 8, 2022, p. 1.
- 19 SIGAR, *Quarterly Report*, SIGAR-2025-QR-3, p. 75.
- 20 SIGAR, *Quarterly Report*, SIGAR-2025-QR-3, pp. 75, 85.
- 21 SIGAR, *Quarterly Report*, SIGAR-2025-QR-3, pp. 78, 85.
- 22 SIGAR, *Stabilization: Lessons Learned from the U.S. Experience in Afghanistan*, SIGAR-18-48-LL, May 24, 2018, p. 91; Emergency Supplemental Appropriations Act for Defense and for the Reconstruction of Iraq and Afghanistan, 2004, Pub. L. No. 108-106, §1110 (2003); SIGAR, *Private Sector Development and Economic Growth: Lessons from the U.S. Experience in Afghanistan*, SIGAR-18-38-LL, April 21, 2018, p. 148.
- 23 SIGAR, *Quarterly Report to the United States Congress*, SIGAR-2021-QR-4, October 30, 2021, p. 51; SIGAR, *Commander's Emergency Response Program*, SIGAR 18-45-AR, April 30, 2018, p. 4.
- 24 SIGAR, *Quarterly Report*, SIGAR-2025-QR-3, p. 85.
- 25 SIGAR, *Quarterly Report*, SIGAR-2025-QR-3, p. 84.
- 26 SIGAR's analysis found that sector boundaries were not rigid, as many obligations funded activities with cross-cutting goals and objectives. For instance, counternarcotics awards intended to curb illicit poppy cultivation may have also enhanced agriculture practices. As another example, the CERP account obligated funds across nine sectors: agriculture, capacity building and governance, counternarcotics, economic growth, education, health, humanitarian relief, infrastructure, and stability. These funds sought to not only improve the stated sector, but also enhance stability.
- 27 SIGAR, *Quarterly Report*, SIGAR-2021-QR-4, pp. 58–59; SIGAR, *Quarterly Report*, SIGAR-2023-QR-3, p. 42; SIGAR, *Quarterly Report*, SIGAR-2025-QR-3, p. 82.
- 28 SIGAR, *Quarterly Report*, SIGAR-2021-QR-4, p. 62.
- 29 SIGAR, *Quarterly Report*, SIGAR-2021-QR-4, pp. 43, 99.
- 30 Pub. L. No. 110-181, § 1229(i)(1)(E).
- 31 Pub. L. No. 110-181, § 1229(i)(2).
- 32 SIGAR, *Quarterly Report*, SIGAR-2021-QR-4, pp. 44–45; SIGAR, *Quarterly Report*, SIGAR-2022-QR-4, pp. 49–50.
- 33 DOD IG, *Audit of the DoD's Financial Management of the Afghanistan Security Forces Fund* (DODIG-2023-082), June 9, 2023, <https://www.dodig.mil/reports>.
- 34 SIGAR, *Quarterly Report*, SIGAR-2025-QR-3, pp. 74–75.
- 35 SIGAR, *Quarterly Report*, SIGAR-2025-QR-3, pp. 74–75.
- 36 SIGAR, *Review Letter: Waste, Fraud, and Abuse Uncovered by SIGAR*, SIGAR 18-60-SP, July 17, 2018.
- 37 SIGAR, *Update on the Amount of Waste, Fraud, and Abuse Uncovered through SIGAR's Oversight Work between January 1, 2018, and December 31, 2019*, SIGAR 21-05-SP, October 15, 2020.
- 38 SIGAR defines "performance reports" as performance audit reports, evaluation reports, inspection reports, special project reports, lessons learned reports, and other SIGAR products. This definition excludes SIGAR's financial audits reports, which are broken out separately, high-risk list reports, congressional testimony reports, investigative reports, and SIGAR's *Quarterly Report to U.S. Congress*. The 793 performance and financial reports includes 476

performance audits, evaluations, inspections, and other reports, 297 financial audits, and 20 lessons-learned products.

39 The 496 published performance reports include 476 performance audits, evaluations, inspections, and other reports, as well as 20 lessons learned reports.

40 SIGAR, *Counternarcotics: Lessons from the U.S. Experience in Afghanistan*, SIGAR-18-52-LL, June 13, 2018.

41 This figure represents the U.S. programs with a substantial counternarcotics focus.

42 SIGAR, *Corruption in Conflict: Lessons from the U.S. Experience in Afghanistan*, SIGAR-16-58-LL, September 14, 2016; SIGAR, *Reconstructing the Afghan National Defense Security Forces: Lessons from the U.S. Experience in Afghanistan*, SIGAR-17-62-LL, September 21, 2017; SIGAR *Private Sector Development and Economic Growth: Lessons from the U.S. Experience in Afghanistan*, SIGAR 18-38-LL, April 19, 2018; SIGAR, *Stabilization*, SIGAR-18-48-LL; SIGAR, *Counternarcotics*, SIGAR-18-52-LL.

43 While SIGAR issued multiple reports on TFBSO programming, it also issued a capstone report that summarized SIGAR's overall findings on TFBSO's effectiveness. See, SIGAR, *DOD Task Force for Business and Stability Operations: \$675 Million in Spending Led to Mixed Results, Waste, and Unsustained Projects*, SIGAR 18-19-AR, January 4, 2018. Furthermore, SIGAR testified multiple times before Congress regarding TFBSO programming and effectiveness. See SIGAR, *Testimony Before the Subcommittee on Readiness and Management Support U.S. Senate, DOD Task Force for Business and Stability Operations in Afghanistan: Preliminary Results Show Serious Management and Oversight Problems*, SIGAR 16-14-TY, January 20, 2015; SIGAR, *Testimony Before the Committee on Armed Services Subcommittee on Oversight and Investigations U.S. House of Representatives, DOD Task Force for Business and Stability Operations in Afghanistan: Review of Selected Expenditures Highlights Serious Management and Oversight Problems*, SIGAR 16-29-TY, April 15, 2016.

44 SIGAR, *Review Letter: Waste Fraud and Abuse Uncovered by SIGAR*, SIGAR 18-60-SP, July 17, 2018; SIGAR, *Inquiry Letter: Scrapping of 16 G222 Aircraft at Kabul International Airport*, SIGAR 15-02-SP, October 3, 2014.

45 SIGAR, *Review: Tarakhil Power Plant*, SIGAR 15-80-SP, August 7, 2015.

46 OPIC was created by Congress in 1969 and was responsible for promoting economic growth in developing countries by encouraging U.S. private investment, financing investments through direct loans, and insuring investments against a broad range of political risks. In 2018, legislation consolidated the Corporation into the newly created United States International Development Finance Corporation. SIGAR, *Review Letter: Abandonment of OPIC Projects in Kabul*, SIGAR 17-13-SP, November 14, 2016.

47 Fraud is defined as the act of obtaining something of value through willful misrepresentation and is determined through the judicial or other adjudicative system. As such, suspected instances of fraud found by SIGAR's Audits and Inspections Directorate while performing its work were referred to SIGAR's Investigations Directorate.

48 SIGAR, *Status of U.S. Efforts to Develop Extractive Tenders: \$125 Million Spent Resulting in No Active Contracts*, SIGAR-18-58-SP, July 5, 2018.

49 SIGAR, *U.S.-Provided Funds and Equipment to Afghanistan: An Assessment of Taliban Access to Assets Remaining in Country When the Afghan Government Collapsed*, SIGAR 23-04-IP, November 9, 2022, p. 2.

50 This amount included \$11.4 billion in government-to-government transfers, consisting of \$10.5 billion from DOD, \$776.8 million from USAID, and \$85.2 million from State. The amount also included almost \$6 billion to multilateral trust funds, consisting of \$4.1 billion to the ARTF, \$1.7 billion to the LOTFA, and \$153.7 million to AITF (see, SIGAR, *Quarterly Report to the United States Congress*, SIGAR-2022-QR-3, July 30, 2022, p. 44).

51 Pub. L. No. 110-181, § 1229(a)(1). National Defense Authorization Act for Fiscal Year 2008.

52 In November 2017, the Government Accountability Office (GAO) released a report examining the coordination of oversight amongst the various inspectors general that had mandates to review assistance spending in Afghanistan. This report found that no SIGAR reports they examined had duplicate objectives with oversight conducted by other organizations. GAO, *Documented Agreement of Certain Roles and Responsibilities Could Further Enhance Coordination in Afghanistan*, GAO-18-6, November 2, 2017.

53 SIGAR's financial audits did not review fixed-price contracts because those costs are negotiated in advance.

54 SIGAR created its Office of Special Projects in response to members of Congress, former ambassadors, and senior military commanders underscoring the need for timely and actionable reports to assist them in evaluating issues and making policy determinations. While SIGAR's Office of Special Projects was separate from the Audits and Inspections Directorate, for the purposes of this report, its reports have been included in the Directorate's totals.

55 Appropriations are amounts Congress has directed U.S. agencies to spend for specific purposes that will result in immediate or future use of government funds. Obligations are when U.S. agencies spend the appropriated amounts. In total, Congress appropriated \$148.2 billion for Afghanistan's reconstruction, of which U.S. agencies obligated \$138.0 billion; \$122.3 billion for reconstruction activities and \$15.7 billion for agency operations, which SIGAR did not have auditing purview.

56 SIGAR, *Despite Improvements in MoI's Personnel Systems, Additional Actions Are Needed to Completely Verify ANP Payroll Costs and Workforce Strength*, SIGAR 11-10-AR, April 25, 2011. SIGAR, *Afghan National Police: More than \$300 Million in Annual, U.S.-funded Salary Payments Is Based on Partially Verified or Reconciled Data*, 15-26-AR, January 7, 2015. SIGAR, *Afghan National Army: Millions of Dollars at Risk Due to Minimal Oversight of Personnel and Payroll Data*, SIGAR 15-54-AR, April 23, 2015. SIGAR, *DOD's Salary Payments to the Afghan Ministry of Defense: DOD Did Not Use APPS as Intended and Internal Control Weaknesses Raise Questions About the Accuracy of \$232 Million in Salary Payments*, SIGAR 22-34-AR, July 22, 2022.

57 SIGAR, *Afghan National Security Forces: Additional Action Needed to Reduce Waste in \$4.7 Billion Worth of Planned and Ongoing Construction Projects*, SIGAR 13-18-AR, September 13, 2013.

58 SIGAR, *\$36 Million Command and Control Facility At Camp Leatherneck, Afghanistan: Unwanted, Unneeded, And Unused*, SIGAR 15-57-SP, May 20, 2015.

59 SIGAR, *Afghan National Defense and Security Forces: DOD Needs to Improve Management and Oversight of Uniforms and Equipment*, SIGAR 17-40 AR, April 25, 2017.

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104 SIGAR, *USAID's Human Resources and Logistical Support Program: Audit of Costs Incurred by International Relief and Development, Inc.*, SIGAR 13-08-FA, July 16, 2013.

105 SIGAR, *Department of State's Efforts to Develop and Sustain Afghanistan's Drug Treatment System: Audit of Costs Incurred by the Colombo Plan for Cooperative Economics and Social Development in Asia and the Pacific results in More than \$23 Million in Questioned Costs*, SIGAR 20-54-FA, September 18, 2020.

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109 SIGAR, *Afghan National Security Forces*, SIGAR 13-18-AR.

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114 SIGAR, *Response to Alert Letter on Afghan Air Force C-130 Aircraft*, SIGAR 14-80a-AL, October 6, 2014.

115 GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G, September 2014.

116 GAO, *Standards for Internal Control in the Federal Government*, p. 5.

117 For reports addressed to more than one agency, SIGAR categorized the agency as "multiple" to ensure that the report's findings, and any associated internal control weaknesses, were not double counted.

118 SIGAR, *Despite Improvements in MoI's Personnel Systems, Additional Actions Are Needed to Completely Verify ANP Payroll Costs and Workforce Strength*, SIGAR 11-10-AR, April 25, 2011; SIGAR, *Afghan National Police*, SIGAR 15-26-AR; SIGAR, *Afghan National Army*, SIGAR 15-54-AR; SIGAR, *DOD's Salary Payments to the Afghan Ministry of Defense: DOD Did Not Use APPS as Intended and Internal Control Weaknesses Raise Questions About the Accuracy of \$232 Million in Salary Payments*, SIGAR 22-34-AR, July 22, 2022.

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120 SIGAR, *Salary Support*, SIGAR 17-56-AR.

121 Pub. L. No. 110-181, § 1229.

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124 SIGAR, *Department of Defense Implemented Less than 40 Percent of SIGAR's Audit and Inspections Recommendations and Does Not Have a System for Tracking Them*, SIGAR 20-35-IP, April 13, 2020; SIGAR, *Department of State Implemented Approximately Half of the Recommendations from SIGAR Audits and Inspections but Did Not Meet All Audit Follow-up Requirements*, SIGAR 21-02-IP, October 5, 2020; SIGAR, *U.S. Agency for International Development Implemented More than 80 Percent of Recommendations from SIGAR Audits and Inspections*, SIGAR 20-46-IP, July 14, 2020.

125 On February 3, 2025, Secretary of State Marco Rubio was named Acting Administrator for USAID. On March 28, 2025, Secretary Rubio issued a press statement saying he notified Congress of State's intent to absorb USAID and its functions, and that USAID will cease operations by July 1, 2025.

126 As of September 20, 2025, U.S. agencies did not implement 21 percent of SIGAR recommendations, six percent were overcome by events that made the recommendation's implementation moot, and less than one percent remained open. SIGAR categorized all open non-monetary USAID recommendations as of March 31, 2025, as "Closed – Over Come by Events" because Secretary Rubio effectively dissolved the agency in March 2025.

127 SIGAR, *Gereshk Cold and Dry Storage Facility: Quality of Construction Appears To Be Good, but the Facility Has Not Been Used to Date*, SIGAR 14-81-IP, July 14, 2014.

128 SIGAR, *Testimony Before the Committee on Foreign Affairs U.S. House of Representatives*, January 15, 2020.

129 SIGAR, *Rule of Law in Afghanistan*, SIGAR 15-68-AR.

130 National Defense Authorization Act for Fiscal Year 2008, Pub. L. No. 110-181, 122 Stat. 378 (2008).

131 National Defense Authorization Act for Fiscal Year 2008, Pub. L. No. 110-181, 122 Stat. 380 (2008).

132 Suspensions and debarments are actions taken by U.S. agencies to exclude companies or individuals from receiving federal funding because of misconduct.

133 SIGAR Management & Support (M&S) Slides, January 06, 2014, pp. 1, 3.

134 SIGAR Management & Support (M&S) Slides, December 27, 2021, pp. 1, 3.

135 SIGAR Investigations Directorate, case file review, May 31, 2024 (Bid Rigging case footnote); Paper, Office of the Justice Attaché, U.S. Embassy, Kabul, "The Case of Mohammad Zia Salehi," August 18, 2011; Letter, Senator Lindsey O. Graham to Attorney General Mohammad Ishaq Aloko, November 10, 2011; Memorandum/DOJ-01-2012, David Schwendiman, Justice Attaché, U.S. Embassy, Kabul to Ambassador Ryan Crocker, "Meeting with Senior Prosecution General Abu Bakr on High Level Corruption," January 3, 2012.

136 Office of the Justice Attaché, U.S. Embassy, Kabul, "The Case of Mohammad Zia Salehi," August 18, 2011.

137 Memorandum, David Schwendiman, Justice Attaché, U.S. Embassy, Kabul, to File, "Criminal Confiscation," June 23, 2012.

138 Article 28, The Constitution of the Islamic Republic of Afghanistan (2004); *See e.g.*, Articles 60–66, Anti-Money Laundering and Proceeds of Crime Law (31 October 2004); *See e.g.*, Articles 54–59, Anti-Money Laundering and Proceeds of Crime Law (October 31, 2004).

139 *See e.g.*, Abdul Qadeer Fitrat Timeline (Kabul Bank), June 4, 2012; *see also*, Memorandum, David Schwendiman, "Abdul Qadeer Fitrat," November 27, 2024.

140 *See e.g.*, "The Case of Mohammad Zia Salehi"; Meeting Notes, Terrorist Finance Working Group (TFWG), Kabul, May 31, 2011.

141 SIGAR was a member of the joint embassy-military fuel task force. SIGAR's Investigations Directorate also submitted a Global Magnitsky Act recommendation to OFAC, which, after OFAC conducted its own investigation, resulted in Treasury/OFAC sanctions of the recommended Afghan individuals.

142 *See*, Memorandum, David Schwendiman to File, "Embassy front office approach to the Hikmat case and to investigating high ranking Afghans and the Taliban senior leadership," November 27, 2024.

143 *See e.g.*, Memorandum, David Schwendiman, Justice Attaché, U.S. Embassy, Kabul, to Ambassador Stephen G. McFarland, "Investigating and Prosecuting the Taliban Senior Leadership," July 3, 2013; Memorandum, David Schwendiman, Justice Attaché, U.S. Embassy, Kabul, to File, "Meeting; Ambassador M. McKinley, April 27, 2014, U.S. Embassy, Kabul," April 28, 2014; Memorandum, David Schwendiman, SIGAR, U.S. Embassy, Kabul, "Meeting; Major General Jeffrey Colt, USA, Commanding General, USFOR-A," March 3, 2014; P. Michael McKinley, "We All Lost Afghanistan," Foreign Affairs, August 16, 2021.

144 *See*, Memorandum, David Schwendiman to File, "Afghan Threat Finance Cell," November 27, 2024.

145 Memorandum, David Schwendiman, SIGAR, U.S. Embassy, Kabul, to File, "Meeting; Major General Jeffrey Colt, USA, Commanding General, USFOR-A," March 3, 2014.

146 David Schwendiman, Justice Attaché, U.S. Embassy, Kabul, Notes on meeting with Ambassador Eikenberry, July 16, 2011; Memorandum (SBU), David Schwendiman, Justice Attaché, U.S. Embassy, Kabul, to Brigadier General Dixie Morrow, Subj: Special Cases Committee; Update, January 28, 2012; Memorandum (SBU), David Schwendiman, Justice Attaché, U.S. Embassy, Kabul, to Ambassador Stephen G. McFarland, Subj: Special Cases Committee Update, March 29, 2012; Briefing for the Corruption and Organized Crime Interagency Effects Group (CCIEG), David Schwendiman, Justice Attaché, U.S. Embassy, Kabul, "Improving the Functionality of the AGO," August 7, 2012. The CCIEG was an interagency group created and managed by Shaffafiyat at the direction of BG H.R. McMaster.

147 In some cases, attorneys in other sections of DOJ's criminal division (such as the Public Integrity Section), or in other DOJ divisions (such as the Tax Division) screened SIGAR cases for prosecution.

148 Sharon E. Woods, Deputy Assistant Inspector General, SIGAR/Investigations Directorate, "Impediments to Effective Investigations and Prosecutions," memorandum to Douglas J. Domin, Assistant Inspector General, SIGAR/Investigations, February 26, 2024, p. 3.

149 SIGAR, *Afghan First Initiative Has Placed Work with Afghan Companies, but Is Affected by Inconsistent Contract Solicitation and Vetting, and Employment Data Is Limited*, SIGAR Audit 12-6, January 31, 2012, pp. i–iii.

150 SIGAR, "Oversight in Conflict: Detecting Fraud in Challenging Environments," SIGAR remarks at the Association of Certified Fraud Examiners, Law Enforcement & Government Anti-Fraud Summit, Washington, DC, November 7, 2019, p. 5.

151 SIGAR, remarks at The Federal Forum, February 21, 2014.

152 SIGAR, *Quarterly Report to the United States Congress*, SIGAR-2021-QR-2, April 30, 2021, pp. 22–23.

153 Stephen Rodrigues, (Resident Representative), United Nations Development Programme, letter to SIGAR, December 5, 2024.

154 Those agencies were: DCIS, DOJ, FBI, Special Inspector General for Iraq Reconstruction (SIGIR), U.S. Army Criminal Investigation Command (USACID), USAID OIG, State OIG.

155 SIGAR, *\$36 Million Command and Control Facility at Camp Leatherneck, Afghanistan: Unwanted, Unneeded, and Unused*, SIGAR 15-57-SP, May 20, 2015, p. 4.

156 A SIGAR special agent visited the commands whose soldiers were killed and met with surviving relatives. SIGAR, *Quarterly Report to the United States Congress*, SIGAR-2013-QR-2, April 30, 2013, pp. 44–46.

157 Forward Operating Base Fenty was named in honor of Joseph Fenty, Jr., a U.S. Army lieutenant colonel who died in March 2006 when his Chinook helicopter crashed during a

high-risk night extraction of one of his Cavalry scout teams from mountainous terrain in Nangarhar Province.

158 Former SIGAR special agent in charge, SIGAR Interview, April 23, 2024.

159 Public Access to Court Electronic Records, <https://pacer.uscourts.gov>; Sentencing US District Court Colorado Jonathan Hightower 12-CR-00262 (November 4, 2013); Sentencing US District Court Colorado Christopher Weaver 12-CR-00261 (November 7, 2013); Sentencing US District Court Colorado Stephanie Shankel (Charboneau) 13-CR-00138 (February 11, 2014); Sentencing US District Court Western District Kentucky Abdullah 5:13CR:37 (March 18, 2014); Sentencing US District Court Alaska Morgan 4:16-CR37 (October 26, 2016); Sentencing US District Court Hawaii Emmons CR-12-00579 (January 11, 2017); Sentencing US District Court Hawaii Dixon CR-12-00574 (January 1, 2017); Sentencing US District Court Hawaii Ware CR-15-00327 (December 19, 2016).

160 Public Access to Court Electronic Records, <https://pacer.uscourts.gov>; Sentencing US District Court Colorado Jonathan Hightower 12-CR-00262 (November 4, 2013); Sentencing US District Court Colorado Christopher Weaver 12-CR-00261 (November 7, 2013); Sentencing US District Court Colorado Stephanie Shankel (Charboneau) 13-CR-00138 (February 11, 2014); Sentencing US District Court Western District Kentucky Abdullah 5:13CR:37 (March 18, 2014); Sentencing US District Court Alaska Morgan 4:16-CR37 (October 26, 2016); Sentencing US District Court Hawaii Emmons CR-12-00579 (January 11, 2017); Sentencing US District Court Hawaii Dixon CR-12-00574 (January 1, 2017); Sentencing US District Court Hawaii Ware CR-15-00327 (December 19, 2016).

161 Former SIGAR Special Agent in Charge, SIGAR Interview, April 23, 2024.

162 Former SIGAR Special Agent in Charge, SIGAR Interview, April 23, 2024.

163 Memorandum, "Summary of the case of Hikmatullah Shadnam," Gul Agha Shirzai, Advisor Minister and Governor of Nangarhar, August 26, 2013.

164 SIGAR Investigations Directorate, case file review, April 28, 2024.

165 SIGAR Investigations Directorate, case file review, April 28, 2024; Memorandum, Mark Miller, Deputy Justice Attaché, David Schwendiman, Justice Attaché to Amb. Tina Kaidanow, December 29, 2012, Subj: U.S. v. \$72,000,000; Forfeiture/Asset Restraint Request of United States.

166 *Id. See also United States v. Sum of \$70,990,605*, 991 F.Supp.2d 144 (D.D.C. 2013); *United States v. Sum of \$70,990,605*, 991 F.Supp.2d 154 (D.D.C. 2013); *United States v. Sum of \$70,990,605*, 4 F. Supp.2d 189 (D.D.C. 2014); *United States v. \$70,990,605*, 2017 WL 573499 (D.D.C. Feb. 13, 2017); *United States v. \$70,990,605*, 234 F. Supp.3d 212 (D.D.C. 2017); *United States v. Sum of \$70,990,605*, 2018 WL 4623568 (D.D.C. Sep. 25, 2018).

167 Sentencing US District Court EDNC, Case Number 5:18-cr-00492, Doc. 8-15 (January 3, 2019), <https://pacer.uscourts.gov>.

168 SIGAR Investigations Directorate, case file review, April 28, 2024.

169 Memorandum, Gul Agha Shirzai, Governor of Nangarhar, August 26, 2013, Subj: Summary of the case of Hikmatullah Shadman.

170 Hikmatullah was a person of interest to U.S. special operators and was detained for a time by the military. He was suspected of providing financial support to the Taliban, furnishing women to the Taliban, supplying alcohol to "foreign forces," and bribery. The military's detention of Hikmat was independent of the civil forfeiture case, but raised questions about how information from Hikmat that might be important in the criminal investigation was obtained and whether that could compromise future U.S. criminal proceedings in some way. *See Memorandum, Gul Agha Shirzai, Governor of Nangarhar, August 26, 2013, Subj: Summary of the case of Hikmatullah Shadman; Notes, Answers to Amb. Kaidanow's Questions re Hikmat, undated; Memorandum, Gul Agha Shirzai, Governor of Nangarhar, August 26, 2013, Subj: Summary of the case of Hikmatullah Shadman; Email, Scott A. MacGriff to Anne W. Benjamin (SRAP), April 22, 2013, Subj: Hekmatullah.*

171 Doost indictment, 1:17-cr-00109(APM), U.S.D.C. for the District of Columbia, <https://pacer.uscourts.gov>, pp. 1, 3.

172 Doost indictment, pp. 2, 5.

173 Doost indictment, p. 5.

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293 In reference to Afghanistan, historian and former U.S. official Carter Malkasian defines the concept of overdetermination as a situation in which “so many factors were pushing the country toward [some outcome] that any other outcome was impossible—no matter what the United States tried to do.” Carter Malkasian, *War Comes to Garmser: Thirty Years of Conflict on the Afghan Frontier* (New York: Oxford University Press, 2013), p. xx. Of note, overdetermination in this context does not necessarily entail U.S. foreknowledge of failure.



The National Defense Authorization Act for FY 2008 (P.L. 110-181) established the Special Inspector General for Afghanistan Reconstruction (SIGAR).

SIGAR's oversight mission, as defined by the legislation, is to provide for the independent and objective

- conduct and supervision of audits and investigations relating to the programs and operations funded with amounts appropriated or otherwise made available for the reconstruction of Afghanistan.
- leadership and coordination of, and recommendations on, policies designed to promote economy, efficiency, and effectiveness in the administration of the programs and operations, and to prevent and detect waste, fraud, and abuse in such programs and operations.
- means of keeping the Secretary of State and the Secretary of Defense fully and currently informed about problems and deficiencies relating to the administration of such programs and operations and the necessity for and progress on corrective action.

Afghanistan reconstruction includes any major contract, grant, agreement, or other funding mechanism entered into by any department or agency of the U.S. government that involves the use of amounts appropriated or otherwise made available for the reconstruction of Afghanistan.

Source: P.L. 110-181, "National Defense Authorization Act for FY 2008," 1/28/2008.

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<https://www.stateoig.gov/hotline>
1-800-409-9926

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