

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 06/15/2006

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To:

[Redacted]

Attn:

SAC [Redacted]
CDC [Redacted]
SSA [Redacted]
SA [Redacted]

Counterintelligence

Attn:

CD-2A [Redacted]
UC [Redacted]
SSA [Redacted]

Inspection

Attn:

IIS, CRS [Redacted]

From: Office of the General Counsel
NSLE/CILU/Room 7947

Contact: AGC [Redacted] 202-324 [Redacted]

Approved By: Thomas Julie F.

[Redacted]

Drafted By:

Case ID # ~~(U)~~ 278-HQ-C1229736-VIO Serial 1424 (Pending)

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Title: ~~(U)~~ INTELLIGENCE OVERSIGHT BOARD
MATTER 2006- [Redacted]

Synopsis: ~~(U)~~ It is the opinion of the Office of the General Counsel (OGC) that this matter is not reportable to the Intelligence Oversight Board (IOB). Rather, it should be maintained in the control file for periodic review by Counsel to the IOB. Our analysis follows.

(U) ~~Derived From: G-3~~
~~Declassify On: 25X1~~

(U)

Administrative: ~~(S)~~ This electronic communication (EC) contains information from the following documents: (1) a copy of the National Security Letter (NSL) dated 01/20/2006 to [Redacted]; (2) a copy of the EC dated 01/20/2006 forwarding the NSL to the [Redacted] Field Division to be served on the carrier; and (3) a copy of the EC dated 06/01/2006 from the [Redacted] Field Office [Redacted] to OGC reporting a potential IOB matter.

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To: [redacted] From: Office of the General Counsel
Re: 278-HQ-C1229736-VIO, 06/15/2006

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Reference: (S) [redacted]

~~(U)~~ By EC dated 06/01/2006, [redacted] requested that OGC review the facts of the captioned matter and determine whether it warrants reporting to the IOB. As explained below, in our opinion, the FBI is not required to report this matter to the IOB.

~~(U)~~ On 01/20/2006, [redacted] drafted an NSL pursuant to 18 U.S.C. § 2709 seeking subscriber and toll billing records for two telephone numbers. Specifically, the NSL sought "the name, address, length of service, and all local and long distance toll billing records associated" with the two telephone numbers from "[i]nception of the account to the present." By EC dated 01/20/2006, the NSL was forwarded to the [redacted] Division to be delivered to [redacted]

~~(U)~~ On 02/15/2006, [redacted] received the results of the NSL on a disk. The case agent reviewed the results from the NSL on 02/23/2006. With respect to one telephone number, [redacted] received information pertaining solely to the target.

~~(U)~~ With respect to the second telephone number, however, [redacted] received NSL results pertaining to two subscribers: the target and another individual.¹ The case agent brought this to the attention of both her supervisor and the Chief Division Counsel (CDC). The case agent also sequestered the telephone records of the individual who was not the subject of the investigation.

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(U) The President, by Executive Order 12334, dated 12/04/1981, established the President's Intelligence Oversight Board (FIOB). On 09/13/1993, by Executive Order 12863, the President renamed it the Intelligence Oversight Board (IOB) and established the Board as a standing committee of the President's Foreign Intelligence Advisory Board. Among its responsibilities, the IOB has been given authority to review the FBI's practices

~~(U)~~ With respect to this telephone number, [redacted] received telephone records dated from [redacted] that were associated with the target. With respect to this same telephone number, [redacted] also received records dated [redacted] that were associated with another individual unrelated to the investigation.

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To: [redacted] From: Office of the General Counsel
Re: 278-HQ-C1229736-VIO, 06/15/2006

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and procedures relating to foreign intelligence and foreign counterintelligence collection.

(U) Section 2.4 of Executive Order 12863 mandates that Inspectors General and General Counsel of the Intelligence Community components (in the FBI, the Assistant Director, Inspection Division (INSD), and the General Counsel, Office of the General Counsel (OGC), respectively) report to the IOB intelligence activities that they have reason to believe may be unlawful or contrary to Executive Order or Presidential Directive. This language has been interpreted to mandate the reporting of any violation of a provision of The Attorney General's Guidelines for FBI National Security Investigations and Foreign Intelligence Collection (NSIG), effective 10/31/2003, or other guidelines or regulations approved by the Attorney General in accordance with EO 12333, dated 12/04/1981, if such provision was designed to ensure the protection of individual rights. Violations of provisions that merely are administrative in nature and not deemed to have been designed to ensure the protection of individual rights are generally not reported to the IOB. The FBI Inspection Division is required, however, to maintain records of such administrative violations for three years so that the Counsel to the IOB may review them upon request. The determination as to whether a matter is "administrative in nature" must be made by OGC. Therefore, such administrative violations must be reported as potential IOB matters.

(U) ~~(S)~~ NSLs are a specific type of investigative tool that allows the FBI to obtain certain limited types of information without court intervention: (1) telephone and email communication records from telephone companies and internet service providers (Electronic Communications Privacy Act, 18 U.S.C. § 2709); (2) records of financial institutions (which is very broadly defined) (Right to Financial Privacy Act, 12 U.S.C. § 3414(a)(5)(A)); (3) a list of financial institutions and consumer identifying information from a credit reporting company (Fair Credit Reporting Act, 15 U.S.C. §§ 1681u(a) and (b)); and (4) full credit report in an international terrorism case (Fair Credit Reporting Act, 15 U.S.C. § 1681v). NSLs may be issued in conformity with statutory requirements, including 18 U.S.C. § 2709. NSIG, section V.12.

(U) ~~(S)~~ Here, during an authorized investigation,² the FBI properly served an NSL on a telephone carrier. In response to

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(S) ² ~~(S)~~ [redacted]

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To: [REDACTED] From: Office of the General Counsel
Re: 278-HQ-C1229736-VIO, 06/15/2006

the properly served NSL, the FBI obtained information regarding another subscriber's records that were not relevant to the investigation.³ It appears that this information, although lawfully obtained, is not relevant to the investigation and should be segregated to protect the potential privacy interests of United States persons. Once information not relevant to an authorized investigation is received, the field should contact the carrier and ask whether the unintentionally acquired information should be returned or destroyed with appropriate documentation to the file.

(U) Based upon these facts, in accordance with the terms implementing the reporting requirements of Section 2.4 of EO 12863, it is our opinion that this error is not reportable to the IOB. A record of this decision should be maintained in the control file for future review by the Counsel to the IOB.

(U) ³ (~~X~~) The target's rights were not violated because he was not the subject of the improperly collected information. It is unknown, however, whether the information associated with the other subscriber pertained to a United States Person inasmuch as there has been no review of the information.

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To: [redacted] From: Office of the General Counsel
Re: 278-HQ-C1229736-VIO, 06/15/2006

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LEAD(s) :

Set Lead 1: (Action)

INSPECTION

AT WASHINGTON, DC

(U) INSD should retain a record of the report of the potential IOB matter, as well as a copy of the OGC opinion concluding that IOB notification is not required, for three years for possible review by the Counsel to the IOB.

Set Lead 2: (Info)

COUNTERINTELLIGENCE

AT WASHINGTON, DC

(U) For information.

Set Lead 3: (Action)

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[redacted]
AT [redacted]

(U) The [redacted] Field Office should contact [redacted] and ask whether the improperly or unintentionally acquired information should be returned or destroyed with appropriate documentation to the file.

cc: Ms. Thomas
[redacted]
IOB Library

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FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 05/05/2006

To: [Redacted]

Attn: SAC [Redacted]
ASAC [Redacted]
SSA [Redacted]
SA [Redacted]

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Counterintelligence

Attn: CD-2B, SSA [Redacted]

Inspection

Attn: IIS, CRS [Redacted]

From: Office of the General Counsel
NSLE/CILU/Room 7947

Contact: AGC [Redacted]

Approved By: Thomas Julie F

[Redacted]

DATE: 06-13-2007
CLASSIFIED BY: 65179 dmh/ksr/gcl
REASON: 1.4 (c)
DECLASSIFY ON: 06-13-2032

Drafted By:

Case ID #: ~~(S)~~ 278-HQ-C1229736-VIO Serial 1289 (Pending)

b2

Title: ~~(S)~~ INTELLIGENCE OVERSIGHT BOARD
MATTER 2006- [Redacted]

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED EXCEPT
WHERE SHOWN OTHERWISE

Synopsis: ~~(S)~~ It is the opinion of the Office of the General Counsel (OGC) that this matter must be reported to the Intelligence Oversight Board (IOB). OGC will prepare and deliver the necessary correspondence to the IOB.

(U) ~~Derived From: G-3~~
~~Declassify On: 25X1~~

Reference: (S) [Redacted]

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Details: ~~(S)~~ By electronic communication (EC) dated 03/29/2006, the [Redacted] Field Office [Redacted] requested that OGC review the facts of the captioned matter and determine whether it warrants reporting to the IOB. In our opinion, it does. Our analysis follows.

(U) ~~(S)~~ On 11/23/2004, [Redacted] case agent submitted a National Security Letter (NSL) seeking telephone toll billing records of a certain target to [Redacted] Due to a

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To: [REDACTED] From: Office of the General Counsel
Re: 178-HQ-C1229736-V10, 05/05/2006

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(U) typographical error, the telephone number on the NSL was erroneously transcribed.¹ On 02/04/2005, the telephone records were opened and it was determined that they were not the target's records. [REDACTED] immediately ceased review of the telephone records.*

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(U) The President, by Executive Order 12334, dated 12/04/1981, established the President's Intelligence Oversight Board (FIOB). On 09/13/1993, by Executive Order 12863, the President renamed it the Intelligence Oversight Board (IOB) and established the Board as a standing committee of the President's Foreign Intelligence Advisory Board. Among its responsibilities, the IOB has been given authority to review the FBI's practices and procedures relating to foreign intelligence and foreign counterintelligence collection.

(U) Section 2.4 of Executive Order 12863 mandates that Inspectors General and General Counsel of the Intelligence Community components (in the FBI, the Assistant Director, Inspection Division (INSD), and the General Counsel, Office of the General Counsel (OGC), respectively) report to the IOB intelligence activities that they have reason to believe may be unlawful or contrary to Executive Order or Presidential Directive. This language has been interpreted to mandate the reporting of any violation of a provision of The Attorney General's Guidelines for FBI National Security Investigations and Foreign Intelligence Collection (NSIG), effective 10/31/2003, or other guidelines or regulations approved by the Attorney General in accordance with EO 12333, dated 12/04/1981, if such provision was designed to ensure the protection of individual rights.

(U) Violations of provisions that merely are administrative in nature and not deemed to have been designed to ensure the protection of individual rights are generally not reported to the IOB. The FBI Inspection Division is required, however, to maintain records of such administrative violations

¹ (U) In order to avoid any further dissemination of this incorrect telephone number, the number is not being listed in this document.

(U) ~~(S)~~ On 03/27/2006, [REDACTED] realized that this incident constituted an IOB violation and promptly reported the matter to OGC, the Inspection Division, and the Counterintelligence Division.

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To: [REDACTED] From: Office of the General Counsel
Re: 278-HQ-C1229736-V10, 05/05/2006

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for three years so that the Counsel to the IOB may review them upon request. The determination as to whether a matter is "administrative in nature" must be made by OGC. Therefore, such administrative violations must be reported as potential IOB matters.

(U) ~~(S)~~ NSLs are a specific type of investigative tool that allows the FBI to obtain certain limited types of information without court intervention: (1) telephone and email communication records from telephone companies and internet service providers (Electronic Communications Privacy Act, 18 U.S.C. § 2709); (2) records of financial institutions (which is very broadly defined) (Right to Financial Privacy Act, 12 U.S.C. § 3414(a)(5)(A)); (3) a list of financial institutions and consumer identifying information from a credit reporting company (Fair Credit Reporting Act, 15 U.S.C. §§ 1681u(a) and (b)); and (4) full credit report in an international terrorism case (Fair Credit Reporting Act, 15 U.S.C. § 1681v). NSLs may be issued in conformity with statutory requirements, including 18 U.S.C. § 2709. NSIG, section V.12.

(U) ~~(S)~~ In this situation, due to the incorrect number stated in the NSL, the FBI received telephone toll billing records pertaining to a telephone number that was neither under investigation nor related to an investigation. Therefore, the information was improperly collected, although unintentionally so, in violation of the NSIG and ECPA.

(U) Here, the target's rights were not violated because he was not the subject of the improperly collected information. It is unknown whether the erroneous information received pertained to a United States Person, inasmuch as there has been no review of the information. Nonetheless, based upon the fact that information which may be about a USP was improperly, although inadvertently, collected, and in accordance with the reporting requirements of Section 2.4 of Executive Order 12863, OGC will prepare a cover letter and a memorandum to report this matter to the ICB.

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To: [redacted] From: Office of the General Counsel
Re: 278-HQ-C1229736-V10, 05/05/2006

LEAD(s) :

Set Lead 1: (Action)

INSPECTION

AT WASHINGTON, DC

(U) For action deemed appropriate.

Set Lead 2: (Information)

COUNTERINTELLIGENCE

AT WASHINGTON, DC

(U) For information.

Set Lead 3: (Information)

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[redacted]

AT [redacted]

(U) The [redacted] Field Office should contact [redacted] and ask whether the improperly or unintentionally acquired information should be returned or destroyed with appropriate documentation to the file.

cc: Ms. Thomas
[redacted]
IOE Library

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U.S. Department of Justice

Federal Bureau of Investigation

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Washington, D. C. 20535-0001

BY COURIER

Mr. Stephen Friedman
Chairman
Intelligence Oversight Board
Room 50209
New Executive Office Building
725 17th Street, Northwest
Washington, D.C.

DECLASSIFIED BY 65179 dmh/kar/gcl
ON 06-13-2007

Dear Mr. Friedman:

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Enclosed for your information is a self-explanatory memorandum entitled "Intelligence Oversight Board Matter 2006-" (U)

The memorandum sets forth details of investigative activity which the FBI has determined was conducted contrary to the Attorney General Guidelines for FBI Foreign Intelligence Collection and Foreign Counterintelligence Investigations and/or laws, Executive Orders, or Presidential Directives which govern FBI foreign counterintelligence and international terrorism investigations. This matter has also been referred to our Internal Investigations Section, Inspection Division, for a determination of whether any administrative action is warranted. (U)

Enclosure

UNCLASSIFIED WHEN
DETACHED FROM
CLASSIFIED ENCLOSURE

~~Derived From: G-3
Declassify On: 25X1~~

~~SECRET~~

NSL VIO-17112

~~SECRET~~

Mr. Stephen Friedman

Should you or any member of your staff require additional information concerning this matter, an oral briefing will be arranged for you at your convenience. (U)

Sincerely,

Julie F. Thomas
Deputy General Counsel

- 1 - The Honorable Alberto R. Gonzales
Attorney General
U.S. Department of Justice
Room 5111

- 1 - Mr. James Baker
Counsel, Office of Intelligence Policy and Review
U.S. Department of Justice
Room 6150

~~SECRET~~

NSL VIO-17113

~~SECRET~~

INTELLIGENCE OVERSIGHT BOARD (IOB) MATTER
[REDACTED] FIELD OFFICE
IOB MATTER 2006-[REDACTED] (U)

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(U) ~~(S)~~ By electronic communication dated March 29, 2006, the Federal Bureau of Investigation (FBI) [REDACTED] Field Office reported that, on November 23, 2004, the FBI submitted a National Security Letter (NSL) seeking telephone toll billing records relating to a certain target to [REDACTED]. Due to a typographical error, the telephone number on the NSL was erroneously transcribed. On February 4, 2005, the telephone records were opened and it was determined that they were not the target's records. [REDACTED] immediately ceased review of the telephone records.

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(U) ~~(S)~~ Due to the incorrect number stated in the NSL, the FBI received telephone toll billing records pertaining to a telephone number that was neither under investigation nor related to an investigation. The error was discovered upon receipt of the information, and the records were neither reviewed nor used for any investigative purpose. Despite the inadvertent nature of the mistake, the fact remains that information was improperly collected on a telephone number unrelated to an investigation. The overcollection was a violation of Section V.12. of The Attorney General's Guidelines for FBI National Security Investigations and Foreign Intelligence Collection. Thus, the matter is being reported to the IOB.

~~Derived from: G-3
Declassify on: 25X 1~~

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From: [redacted] OGC (FBI)
Sent: Thursday, December 07, 2006 3:36 PM
To: HQ-Div09-NSLB
Subject: IOB Handbook

~~SECRET~~
RECORD IOB

Here's what you've all been waiting for! I've attached the internal IOB policy providing guidance on whether a potential IOB is reportable/nonreportable and instructions on drafting IOB opinions. Please follow this guidance so that we can be consistent when drafting IOB opinions. Please note, the internal policy is NOT to be distributed outside of NSLB - this is for internal use only.

Sorry about all the attachments, but I thought it would be best for everyone to have an electronic copy so that you can cut and paste as necessary. If you'd like a hard copy (+attachments) please let me know.

- Attachment #1 - IOB Policy sent to all Divisions (dated 11/16/2006)
- Attachment #2 - Sample of nonreportable EC
- Attachment #3a - Sample of reportable EC
- Attachment #3b - Sample of reportable Letter to IOB
- Attachment #3c - Sample of reportable LHM

If you have any questions or comments, don't hesitate to contact [redacted] or me.

Thanks!

[redacted]

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Internal IOB
uidance Memo.wpd.



IOB Attachment
#1.wpd (37 KB)



IOB Attachment
#2.wpd (31 KB)



IOB Attachment
#3a.wpd (27 KB)...



IOB Attachment
#3b.wpd (35 KB)...



IOB Attachment
#3c.wpd (10 KB)...

~~DERIVED FROM: Multiple Sources~~
~~DECLASSIFICATION EXEMPTION 1~~
~~SECRET~~

From: [redacted] OGC (FBI)
Sent: Wednesday, November 29, 2006 4:37 PM
To: HQ-Div09-NSLB
Subject: IOB Policy

~~SECRET~~
RECORD IOB

All -
The Revised IOB Policy was uploaded into ACS yesterday - 278 HQ C1229736 Serial 2570. I've attached an electronic copy to this email for your convenience. We've also drafted an internal "handbook" for drafting IOB opinions which should be finalized any day now. If you have any questions, please feel free to contact me or [redacted]

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Thanks

[redacted]



IOB External
Guidance.wpd (37 ..

~~DERIVED FROM Multiple Sources~~
~~DECLASSIFICATION EXEMPTION 1~~
~~SECRET~~

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From: [redacted] (OGC) (FBI)
Sent: Wednesday, April 05, 2006 2:53 PM
To: HQ-Div09-NSLB
Subject: LHM IOBs
SENSITIVE BUT UNCLASSIFIED
NON-RECORD

All -
To follow up [redacted] and I met with DGC Thomas yesterday to discuss how we are going to handle potential IOBs re late or overdue 10-day notifications or annual LHMs. As [redacted] said, all of these late notifications/LHMs must be reported to OGC as potential IOBs - despite the language in Section H (Nonreportable Matters) of the 02/10/2005 EC.

[redacted]

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I know we've gotten a lot of late LHM IOBs lately. I hope this clears up how we should handle them. As [redacted] said, there will be more formal guidance - both for what the field should be reporting as potential IOBs and how we should handle them - in the near future. Until then, please feel free to give me a call if you have questions.

[redacted]

-----Original Message-----

From: [redacted] (OGC) (FBI)
Sent: Wednesday, April 05, 2006 9:31 AM
To: FBI ALL CDCs
Cc: [redacted] (OGC)(FBI)

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[redacted]

[redacted] (OGC)(FBI); THOMAS,
JULIE F. (OGC) (FBI); [redacted] (OGC)(FBI);
[redacted] (OGC) (FBI)
Subject: FW: IOBs

SENSITIVE BUT UNCLASSIFIED
NON-RECORD

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Julie Thomas, the deputy General Counsel, has determined that all LHM overruns - the ten day notifications or the one year LHMs - need to be reported as potential IOBs, regardless of whether it is a USP or non-USP. [redacted] but she wants to keep track of compliance in the field so she wants to know about incidents of non-compliance.

Further, as to good news, in cases where we overcollect because of the provider - it may be that we do not have to report these as potential IOBs. If the information that the provider gave us beyond what we asked for (e.g., more telephone accounts of the same subscriber; longer period of time for toll billing records) is relevant to an authorized investigation, it will not have to be reported as an IOB. However, what needs to be done is to determine whether the information falls within the parameters of the attachment (assuming there is one), as the attachments are very broad and may cover the account information you received (the only information we say not to provide is content information). If so, you are home free. If the attachment doesn't cover the information you received, you can issue an NSL for that information. In either case, again, all predicated on the information being relevant to an authorized national security investigation, there would be no need to report a potential IOB.

There is going to be an EC to this effect in the near future, but this policy is currently effective.

[redacted]

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-----Original Message-----
From: [redacted] (OGC) (FBI)
Sent: Tuesday, April 04, 2006 5:22 PM
To: [redacted] (FBI)
Cc: [redacted] (OGC) (FBI)
Subject: IOBs

SENSITIVE BUT UNCLASSIFIED
NON-RECORD

Concerning your ten day overrun [redacted] and I just talked to Julie Thomas on this issue. She wants these, as well as all annual LHM overruns, USP and non-USP, reported as potential IOBs, and we will then decide whether to report them as IOBs. [redacted] but she wants them reported as potential IOBs so OGC can keep track of problems generally in following procedures, even though not reported to the IOB. [redacted]

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I know this is new, particularly with respect to annual LHMs, so we will be sending something out on this.

[redacted]

SENSITIVE BUT UNCLASSIFIED

SENSITIVE BUT UNCLASSIFIED

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From: [redacted] (OGC) (FBI)
Sent: Friday, December 08, 2006 8:50 AM
To: HQ-Div09-NSLB
Subject: RE: IOB Handbook

DECLASSIFIED BY: 65179 dmh/ker/gcl
ON 06-15-2007

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RECORD IOB

Ok, after all that, I attached the wrong document. The official internal guidance is dated 11/30/2006 - I attached an old draft (Thank you [redacted] I would never have noticed). I'm resending the whole email so you have everything in one place. Please delete the old one. My apologies.

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IOB Internal Guidance.wpd (106.. #1.wpd (37 KB) IOB Attachment #2.wpd (31 KB) IOB Attachment #3a.wpd (27 KB)...#3b.wpd (35 KB)...#3c.wpd (10 KB)...

-----Original Message-----

From: [redacted] (OGC) (FBI)
Sent: Thursday, December 07, 2006 3:36 PM
To: HQ-Div09-NSLB
Subject: IOB Handbook

~~SECRET~~
RECORD IOB

Here's what you've all been waiting for! I've attached the internal IOB policy providing guidance on whether a potential IOB is reportable/nonreportable and instructions on drafting IOB opinions. Please follow this guidance so that we can be consistent when drafting IOB opinions. Please note, the internal policy is NOT to be distributed outside of NSLB - this is for internal use only.

Sorry about all the attachments, but I thought it would be best for everyone to have an electronic copy so that you can cut and paste as necessary. If you'd like a hard copy (+attachments) please let me know.

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- Attachment #2 - Sample of nonreportable EC
- Attachment #3a - Sample of reportable EC
- Attachment #3b - Sample of reportable Letter to IOB
- Attachment #3c - Sample of reportable LHM

If you have any questions or comments, don't hesitate to contact [redacted] or me.

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Thanks!



<< File: internal IOB Guidance Memo.wpd >> << File: IOB Attachment #1.wpd >> << File: IOB Attachment #2.wpd >> << File: IOB Attachment #3a.wpd >> << File: IOB Attachment #3b.wpd >> << File: IOB Attachment #3c.wpd >>

~~DERIVED FROM: Multiple Sources~~
~~DECLASSIFICATION EXEMPTION 1~~
~~SECRET~~

