

United States General Accounting Office

Report to the Committee on the Judiciary  
U.S. Senate

DEPARTMENT OF JUSTICE

Control of Firearms Between  
DEPARTMENT OF JUSTICE



125830

U.S. Department of Justice  
National Institute of Justice

This document has been reproduced exactly as received from the person or organization originating it. Points of view or opinions stated in this document are those of the authors and do not necessarily represent the official position or policies of the National Institute of Justice.

Permission to reproduce this ~~document~~ material has been granted by

Public Domain

U.S. General Accounting Office

to the National Criminal Justice Reference Service (NCJRS).

Further reproduction outside of the NCJRS system requires permission of the ~~document~~ owner.

125830

---

General Government Division

B-238723

March 21, 1990

The Honorable John Glenn  
Chairman, Committee on Governmental Affairs  
United States Senate

Dear Mr. Chairman:

As you requested, we reviewed the relationship between the Drug Enforcement Administration (DEA) and the Federal Bureau of Investigation (FBI) in investigating drug trafficking. The primary objectives of our review were to determine (1) how DEA and the FBI coordinate their drug law enforcement activities; (2) how the Department of Justice oversees drug law enforcement activities; and (3) the status of efforts to merge the drug enforcement authority and resources of DEA and the FBI into a single agency, including agency views on the advantages and disadvantages of such a merger.

---

## Results in Brief

DEA and the FBI carry out their drug law enforcement responsibilities independent of each other. They independently develop investigative strategies and priorities, operate separate intelligence systems, and use different systems for reporting and measuring their performance.

The agencies undertook several joint initiatives designed to enhance coordination. Some initiatives were more successful than others. Agency officials acknowledge that day-to-day informal coordination has been more successful than some of their formal coordination efforts.

A 1982 Attorney General order directing a coordinated effort between the two agencies required the Administrator, DEA, to report through the Director, FBI, to the Attorney General. This aspect of the order was never followed and the Attorney General is considering rescinding it. He prefers that both agency heads continue reporting directly to him.

In December 1989, the Attorney General took another step to ensure coordination. He filled the Deputy Attorney General position and assigned the new Deputy responsibility for overseeing operational matters and resolving disputes between the two agencies, in addition to his other duties. This action is consistent with recommendations in our 1986 report on Justice's management processes. Among other things, we recommended greater central direction and management of Justice's component agencies.

Since 1981, the Attorney General has at least twice considered and rejected merging DEA and FBI drug law enforcement activities. Although the Attorney General is not currently planning a merger, he is not ruling out such a merger if the need arises in the future, according to his Executive Assistant. Agency officials suggested several advantages and disadvantages of such a merger.

## Background

In 1973, President Nixon established DEA in the Department of Justice to enforce the federal drug laws (Title 21, U.S.C.). The President designated DEA as the lead federal agency for drug law enforcement. In January 1982, the Attorney General issued an order making the investigative resources of the FBI available to complement and supplement those of DEA in investigating drug law violations under Title 21. His order placed DEA's Administrator under the general supervision of the FBI's Director and required the Administrator to report through the Director to the Attorney General. This move was designed to ensure coordination of the two agencies' drug law enforcement efforts.

DEA's responsibilities were not changed by the Attorney General's order. DEA's responsibilities include

- investigating major drug law violators who produce and distribute illegal drugs, both domestically and internationally;
- countering the diversion of legally produced drugs into illicit markets;
- participating in federal, state, and local drug law enforcement task forces;
- managing a national narcotics intelligence system to collect, analyze, and disseminate drug intelligence; and
- managing the Domestic Cannabis Eradication/Suppression Program.

The FBI received an additional responsibility as a result of the 1982 Attorney General's order—investigating drug law violations. The FBI investigates many other crimes, such as interstate gambling, bank robberies, extortion, civil rights violations, kidnapping, corruption of public officials, and acts of terrorism. The FBI's six priority programs are drug trafficking, counter-terrorism, foreign counter-intelligence, traditional organized crime, white-collar crime, and violent crime.

DEA's fiscal year 1989 budget was \$534.5 million. In June 1989, DEA employed 2,527 special agents in its headquarters and domestic field offices and 252 special agents in 45 foreign countries. The FBI's fiscal year 1989 budget was \$1.4 billion, of which \$129.2 million was for its

drug program. In June 1989, the FBI employed 9,606 special agents in its headquarters, domestic field offices, and 16 foreign countries. Of these, 1,566 special agents were investigating drug law violations.<sup>1</sup>

## Objectives, Scope, and Methodology

To accomplish our objectives, we interviewed officials and reviewed documents from the Washington, D.C., headquarters offices of the Justice Department, DEA, and FBI. We did field work and visited DEA and FBI officials in three cities determined by DEA and the FBI to be major centers of drug trafficking: Los Angeles, San Diego, and Miami. We also visited the El Paso Intelligence Center (EPIC) in Texas.<sup>2</sup>

We reviewed DEA's and the FBI's national drug strategies, their 1982 Implementation Directive for Concurrent Drug Investigative Jurisdiction Between the Drug Enforcement Administration and the Federal Bureau of Investigation, and documents related to DEA and FBI coordination initiatives. We examined Justice Department correspondence and Attorney General orders, and we reviewed the Office of National Drug Control Policy's September 1989 and January 1990 National Drug Control Strategies. We also included various DEA and FBI reports; analyses; budgets; correspondence; historical documents; special studies; selected closed case files; and agency accomplishments (in terms of statistics on investigations, arrests, convictions, drug seizures, and asset seizures and forfeitures) in our review. We accepted agency statistics as presented to us and did not validate any of the figures.

We used our report, Justice Department: Improved Management Processes Would Enhance Justice's Operations (GAO/GGD-86-12, Mar. 14, 1986), to evaluate Justice's implementation of our 1986 recommendations regarding strengthening its management controls over component agencies.

We discussed the contents of this report with responsible agency officials, who generally agreed with its contents. Based on their comments, we made changes to the report where appropriate. We did our audit work from September 1988 through January 1990 and in accordance with generally accepted government auditing standards.

<sup>1</sup>Because of the many types of crimes that the FBI investigates, special agents are not necessarily assigned exclusively to drug investigations. The FBI estimated this figure on the basis of the total number of hours its agents recorded as working on drug investigations.

<sup>2</sup>EPIC is a clearinghouse for intelligence concerning the smuggling of illegal drugs, weapons, and aliens. It is administered by DEA and staffed by personnel from 10 federal agencies.

---

## DEA and FBI Operations Largely Independent

DEA and the FBI have the same goal in the war on drugs: to identify, investigate, and arrest members of high-level drug trafficking organizations and to destroy the operations of those organizations. To help accomplish this, both agencies seize assets related to illegal drug activities for forfeiture to the federal government.

For the most part, the two agencies operate independently. Each agency independently establishes investigative strategies and priorities, collects and stores intelligence, and targets drug trafficking organizations. Generally, the two agencies separately initiate and conduct investigations, using different investigative philosophies and techniques. The agencies also differ in the way they measure performance.

Drug investigations done jointly by DEA and the FBI in fiscal years 1987 and 1988 comprised about 6 percent of DEA's total cases and about 16 percent of the FBI's total drug cases. Officials from both agencies agreed that the number of joint investigations is relatively small in comparison to the total. However, they are generally satisfied with this level.

---

## DEA Investigations

DEA's 1990/1991 Strategic Plan calls for immobilizing major drug traffickers and their organizations and using DEA's authority to seize traffickers' assets in each investigation. DEA's highest priorities are (1) its Special Enforcement Operations, which target specific major organizations; and (2) its Special Enforcement Programs, which focus on specific drug trafficking problems or areas. According to DEA, DEA's goal is to dismantle major national and international drug trafficking organizations. DEA does not necessarily arrest all the organizations' leaders and key members at one time. In some investigations, DEA arrests individual members of organizations and attempts to turn less significant criminals into informants and learn more about the key figures. This approach allows DEA to "work up the ladder" of an organization and reach its leaders.

DEA is the single point of contact abroad for drug investigations, intelligence, and liaison. DEA and the FBI have agreed that, with the exception of Italy and Canada, the FBI will not coordinate directly with foreign drug enforcement officials regarding the international aspects of its drug investigations. Any involvement of FBI personnel in foreign investigations must have the concurrence of both DEA and FBI headquarters officials.

---

## FBI Investigations

In May 1986, the FBI adopted and still uses its nationwide drug investigation strategy at FBI field offices. The FBI strategy is designed to focus the agency's resources on investigations of groups controlling significant segments of the illegal drug market. The major objective of the strategy is to investigate large-scale cocaine and heroin trafficking organizations nationwide, with the aim of dismantling the organizations and seizing their illegal profits. A secondary objective of the FBI strategy is to investigate marijuana and other types of drug cases if major organizations are involved.

According to FBI officials, the FBI attempts to dismantle an entire drug trafficking organization in a single law enforcement operation. The FBI tries to observe the activities of an organization and identify its leaders and key members. When the FBI has identified the principal members and gathered sufficient evidence to prosecute them, it attempts to arrest all the leaders and key members at one time.

---

## DEA and the FBI Maintain Separate Intelligence Systems

DEA's Narcotics and Dangerous Drugs Information System (NADDIS) is the principal intelligence system used by DEA to store and disseminate information on an individual's past criminal drug activities, associates, and other information documented by DEA. In January 1990, NADDIS contained approximately two million names collected over the past 16 years, as well as information on businesses, ships, airplanes, and airfields. NADDIS is accessible from about 1,500 DEA terminals worldwide, and it is used also by authorized federal, state, and local law enforcement agencies.

According to DEA and the FBI, FBI field offices routinely access NADDIS in the course of their drug investigations through requests to local DEA offices and to EPIC. However, the FBI's Organized Crime Information System (OCIS) and Investigative Support Information System (ISIS) are the principal intelligence systems used in FBI drug investigations. OCIS, originally developed to support traditional organized crime investigations, contains information about the characteristics, attributes, and relationships of individuals, businesses, and criminal enterprises. According to the FBI, about 35 percent of the information in OCIS is drug-related. ISIS is a system used to assist FBI field offices in keeping track of data generated by all major FBI investigations. FBI officials said that because the information in OCIS and ISIS is too sensitive and not relevant to drug investigations, they do not give DEA or any other state, local, or federal agency access to these systems.

---

According to FBI officials, the FBI is developing another system, the Drug Information System (DIS), which will contain only drug-related intelligence data. The FBI is considering making these data available to other drug enforcement agencies.

The September 1989 and January 1990 National Drug Control Strategies call for improving and unifying federal drug intelligence systems and increasing the accessibility of these systems to law enforcement agencies. The strategies emphasize the need to maximize the sharing and use of drug intelligence among appropriate government organizations. The 1990 strategy states that the administration will create a National Drug Intelligence Center to consolidate and coordinate intelligence gathered by law enforcement agencies and to disseminate the results to appropriate agencies. The Justice Department will supervise the center. DEA and the FBI will be the primary users, according to a Justice Department official.

---

## Performance Measurement Systems Are Different

DEA and the FBI also have different ways in which they measure agency performance. DEA uses a violator classification system, which distinguishes between major traffickers and minor drug violators. The FBI does not have a violator classification system; it classifies major cases on the basis of intelligence that has been collected. The two agencies have no plans to develop a common system for measuring their accomplishments.

The Geographic-Drug Enforcement Program (G-DEP) is DEA's system for measuring its enforcement activities. DEA management uses G-DEP as a means of internally monitoring the productivity and efficiency of its organizational elements and programs. Externally, the system is used by the executive branch and Congress to evaluate DEA's productivity and efficiency. G-DEP is a code classification system that categorizes drug violators and drug cases into four classes—from highest to lowest level traffickers. These classifications are based on quantitative criteria—the amounts of drugs involved—and qualitative criteria—the violator's position within the drug trafficking network. The G-DEP system also identifies the type of drug involved, the violator's geographical locations, the type of case, and the type of investigation.

The FBI's performance management system does not classify drug violators, and it does not classify its cases according to the significance or importance of the individual traffickers within their organizations.

Instead, it tracks cases according to type of major drug trafficking organizations identified as priorities in its national drug strategy. According to FBI officials, rather than classify cases by individual violator, the FBI uses the number of "dismantled organizations" as its criterion of success.

## Coordination Between Agencies

In 1982, DEA and the FBI established formal procedures to facilitate the coordination of investigative matters. Some of these procedures are no longer considered necessary and are not followed. The two agencies also undertook a variety of joint projects to coordinate or integrate certain activities and functions, such as efforts to enhance intelligence sharing. Some of these joint projects were viewed by agency officials as successful, while others were not.

Agency officials agreed that informal coordination has generally worked better than formal joint projects. Generally, agency officials said, coordination works well between the two agencies, but personalities can sometimes affect the outcome of coordination efforts. Appendix I discusses the two agencies' coordination efforts in greater detail.

## Justice Department Oversight of DEA and FBI Operations

Justice Department officials acknowledge that until recently the Justice Department did not actively oversee the activities of DEA and the FBI to ensure they were coordinating their work. The Executive Assistant to the Attorney General, acting as the Attorney General's chief spokesman, said the current Attorney General believes in central management and recognizes that DEA and the FBI have been "semi-autonomous in their attitudes and behavior." In December 1989, the Attorney General filled the Deputy Attorney General position and assigned the new Deputy the responsibility, in addition to his other duties, for overseeing DEA and the FBI. The Deputy is responsible for handling the agencies' operational matters and resolving disputes as needed.

The Executive Assistant said that the Attorney General believes the DEA Administrator and FBI Director must ultimately be held accountable to him. Consequently, the two agency heads are to report to the Deputy on day-to-day operational matters, but they report directly to the Attorney General on more important matters, such as policy and strategic decisions.

The Attorney General's decision requiring the Deputy Attorney General to provide greater central direction and management over DEA and the

---

FBI is consistent with recommendations we made in a 1986 report for strengthening central management of the Justice Department.<sup>3</sup> We recommended that the Attorney General clearly assign responsibility to top-level Justice executives for overseeing program operations and efficiently managing the Department. The Justice Department generally agreed with the thrust of the report and said it strongly supported almost all of our recommendations.

---

### Attorney General's 1982 Order Not Followed

As discussed earlier, in 1982 the Attorney General issued an order that, in part, directed the DEA Administrator to carry out his functions under the general supervision of the FBI Director and to report through the Director to the Attorney General. This was intended to ensure coordination between DEA and the FBI, but this aspect of the order was never followed.

According to agency officials, the DEA Administrator continued to report directly to the Attorney General. The FBI Director was kept informed of DEA policy changes but was not involved in DEA's operations. The Executive Assistant to the Attorney General said the Attorney General is considering rescinding this aspect of the 1982 order because he believes it is appropriate for the two agency heads to report directly to him.

---

### DEA/FBI Merger Not Likely at This Time

Merging DEA and FBI drug enforcement activities has been considered at least twice since 1981. In 1981, an advisory committee appointed by the Attorney General recommended that DEA and the FBI be linked in a consolidated effort against drugs. The committee recommended that DEA and the FBI not be completely merged, but it noted that such a merger might be advisable in the future. The advisory committee's report cited differing organizational structures, administrative procedures, and personnel practices as impediments to a complete merger. The Attorney General followed the committee's advice and linked, but did not merge, the two agencies in 1982.

A merger was again rejected in 1987. The Anti-Drug Abuse Act of 1986 required the President to submit recommendations to Congress for reorganizing the executive branch to more effectively combat drug trafficking and drug abuse. The President delegated this task to the Attorney General. On April 22, 1987, the Attorney General announced that DEA

---

<sup>3</sup>Justice Department: Improved Management Processes Would Enhance Justice's Operations (GAO/ GGD-86-12, Mar. 14, 1986).

and the FBI would not be merged. The Attorney General said that it made "good sense" to retain DEA as a separate and distinct agency, and he also said that the current organizational structure—combined with increased joint activity—was "the most effective pattern for the future."

According to his Executive Assistant, the Attorney General does not believe that a merger of DEA and FBI drug enforcement functions makes sense at this time because the two agencies' missions are too different and the FBI has many other priority programs. While the Attorney General is not currently considering a merger, he is not ruling out a future merger if the need arises.

## Views Pertaining to DEA/ FBI Merger

We solicited opinions from DEA and FBI headquarters officials regarding the advantages and disadvantages of merging the two agencies' drug enforcement functions into one agency. The officials cited several advantages to establishing one drug law enforcement agency. They said a merger would

- provide uniformity of policy, guidelines, and programs;
- create a single national drug investigative strategy;
- eliminate redundancies in management, intelligence data bases, physical facilities, communications equipment, training, and research and development; and
- eliminate having two different systems for measuring drug investigation performance and accomplishments.

DEA and FBI officials also cited disadvantages. An FBI official said that the American public might view a merger of DEA and the FBI as signaling a reduced commitment by the federal government to the war on drugs. DEA pointed out that creating a single set of policies, procedures, and practices could be disruptive to operations during the transition. Both DEA and FBI officials commented that the morale of employees of the disbanded agency could be negatively affected, leading to decreased productivity and performance.

In discussing the merger pros and cons, some officials said a major consideration in any merger decision would be the question of whether the federal government should have a law enforcement agency solely devoted to drugs. DEA already fulfills this role.

---

DEA officials pointed out that the agency has years of experience with a wide variety of drug enforcement programs, as well as established contacts within the United States and in foreign countries. Some of the DEA officials were against the FBI absorbing DEA because of the FBI's multiple missions. They questioned whether a drug program in the FBI would continually be given the necessary priority and resources.

FBI officials, on the other hand, said they believe the FBI would be the logical choice as the only federal drug law enforcement agency. They said drugs pervade every major category of crime, and the FBI is able to generate a large amount of drug-related intelligence from its investigations of other crimes. The FBI has also established relationships internationally in its other priority programs, such as organized crime and white-collar crime, that would help with international drug investigations, they said. We did not attempt to substantiate either agency's views.

---

As arranged with the Committee, we plan no further distribution of this report until 30 days after the date of the report, unless you release the report or its contents prior to that time. After 30 days, we will send copies to the Attorney General; Administrator, DEA; Director, FBI; and other interested parties. We will make copies available to others upon request.

Major contributors to this report are listed in appendix II. Please contact me at 275-8389 if you have any questions concerning the report.

Sincerely yours,

*Lowell M. Dodge for*

Lowell Dodge  
Director, Administration  
of Justice Issues



---

# Contents

---

Letter		1
<hr/>		
Appendix I		14
DEA and FBI	1982 Joint Agreement	14
Coordination Efforts	Link-Up Committee	14
	Six-City Joint Drug Plan	15
	DEA and FBI Intelligence Sharing	15
<hr/>		
Appendix II		17
Major Contributors to	General Government Division, Washington, D.C.	17
This Report	Los Angeles Regional Office	17

---

## Contents

---

---

## Abbreviations

DEA	Drug Enforcement Administration
DIS	Drug Information System
EPIC	El Paso Intelligence Center
FBI	Federal Bureau of Investigation
G-DEP	Geographic-Drug Enforcement Program
ISIS	Investigative Support Information System
NADDIS	Narcotics and Dangerous Drugs Information System
OCIS	Organized Crime Information System

# DEA and FBI Coordination Efforts

In 1982, DEA and the FBI established formal procedures to facilitate the coordination of investigative matters. Some of the procedures are no longer considered necessary and are not followed. The two agencies also initiated various joint projects intended to coordinate or integrate certain activities and functions. Agency officials said some of these projects have been successful.

## 1982 Joint Agreement

In March 1982, DEA and the FBI jointly prepared and issued the Implementation Directive for Concurrent Drug Investigative Jurisdiction Between the Drug Enforcement Administration and the Federal Bureau of Investigation. The Directive's purpose was to implement the Attorney General's decision to give the FBI the authority to investigate violations of federal drug laws, and it addresses areas in which "the FBI will supplement and, just as important, complement" DEA's efforts in attacking the drug crime problem. The Directive specifies procedures to be followed by the two agencies in coordinating investigative matters.

Officials of both agencies characterized the Directive as a document that was necessary in 1982 (when the FBI first received Title 21 authority) but which has somewhat outlived its usefulness. They said it was needed initially to establish operational parameters and define roles, but some of its procedures are no longer followed or considered necessary. For example, regular meetings between DEA and FBI headquarters and field office officials are not held as required by the Directive because the officials meet and coordinate as needed.

## Link-Up Committee

In 1984, the FBI Director asked that an executive level DEA-FBI committee be formed "to avoid duplication, effect economy, and make the operations of the FBI and DEA more effective and efficient." The resulting Committee for the Coordination of FBI/DEA Activities (referred to as the Link-Up Committee), and many of the subsequent initiatives it undertook, was also predicated upon the possibility of a merger between DEA and the FBI.

The Link-Up Committee eventually undertook 56 projects aimed at "integrating appropriate functions" of the two agencies. Nine of the 56 initiatives were successfully implemented, according to DEA and FBI officials. These included sharing training facilities at the FBI Academy in Quantico, Virginia; using the FBI's Applicant Program to conduct background investigations of prospective DEA agents; and co-locating a small number of DEA and FBI agents in field offices.

Other initiatives were discarded, merged, or remained active until the Attorney General announced in April 1987 that DEA and the FBI would not merge. The Attorney General directed in his announcement that efforts should continue on initiatives to promote cooperation and efficiency. These efforts were to focus on such areas as: developing a national drug strategy; setting field office boundaries; and co-locating offices, and support, communication, and other services. The Link-Up Committee narrowed the remaining initiatives to eight that it determined best met the Attorney General's directions.

Link-Up Committee officials told us that since 1987 little work has been done on the eight initiatives. They said two initiatives have been discarded, three are still active but not being worked on, and three are active but with sporadic work being done on them.

---

## Six-City Joint Drug Plan

In late 1987, the DEA Administrator and FBI Director directed their agencies to develop and implement a joint investigative plan designed to attack the most significant national and international drug trafficking organizations. The Six-City Joint Drug Plan was subsequently established. Under the plan, DEA and the FBI were to jointly investigate selected major drug trafficking cases in six principal drug distribution cities: Chicago, Houston, Los Angeles, Miami, New York, and San Diego. In each city, special-agents-in-charge from both agencies' field offices jointly designed a plan to meet the program's objectives for their regions.

Both agencies considered the joint efforts in Chicago and Houston to be successful. An FBI assessment of the program states that in Chicago, for example, "The mutual understanding of each agency's expertise and mission has saved hundreds of hours of manpower and has led to the more effective use of resources." The agencies considered the joint efforts in Miami, New York, and San Diego less successful because of conflicts and problems, such as disagreements over staffing. DEA and FBI officials said that their offices in Los Angeles no longer participate in the program because of personality differences and conflicts over investigative strategies and approaches.

---

## DEA and FBI Intelligence Sharing

According to DEA and FBI officials, the two agencies made several attempts to enhance intelligence sharing. These efforts, described below, have had mixed success, according to agency officials.

- FBI and DEA counterpart field offices are required to notify each other when a drug investigation is opened. DEA field offices are to transmit the information to DEA headquarters for input into NADDIS. Subjects of drug investigations can then be disclosed to authorized NADDIS users. FBI officials told us that a 1989 FBI study of six cities showed that many new FBI cases were never entered into NADDIS. According to the FBI, the information had been sent from FBI field offices to DEA field offices. Neither the FBI nor DEA could determine where the breakdown occurred. As an alternative to the current procedure, the FBI is considering modifying its computerized Field Office Information Management System so that it will automatically enter FBI case openings in NADDIS.
- In 1988, a joint DEA/FBI Drug Intelligence Unit was established at DEA headquarters. The unit's purpose was to provide intelligence support to three DEA Special Enforcement Operations directed at Mexican and Colombian drug trafficking groups, and to the DEA/FBI Six-City Joint Drug Plan. The FBI indicated it had provided a unit chief, two supervisory agents, and four intelligence analysts, but DEA had not assigned full-time staff to the unit. A DEA official said that DEA analysts were not yet needed full-time. FBI officials said that DEA analysts could have been used productively but DEA was unwilling to use FBI intelligence analysis techniques. We did not evaluate their assessments.
- In Miami and Chicago, DEA and FBI field offices created joint intelligence working groups in 1985 and 1989. These groups gather, collate, and analyze field-based intelligence. Intelligence produced by the working groups led to the arrest of major drug traffickers and the seizure of large quantities of drugs, and both agencies consider the working groups so successful that they plan to expand the concept to other cities. The September 1989 National Drug Control Strategy also recommends expanding the use of the DEA/FBI joint intelligence working group concept.

---

# Major Contributors to This Report

---

## General Government Division, Washington, D.C.

Weldon McPhail, Assistant Director, Administration of Justice Issues  
John L. Violet, Assistant Director, Administration of Justice Issues  
William J. Kruvant, Advisor  
Rodney F. Hobbs, Evaluator

---

## Los Angeles Regional Office

Ronald G. Viereck, Regional Management Representative  
Cassandra I. Gudaitis, Evaluator-in-Charge  
Dorian R. Dunbar, Evaluator

Particular attention is given to the following:

1. The general condition of the  
2. The condition of the  
3. The condition of the

4. The condition of the

5. The condition of the

6. The condition of the

7. The condition of the