## [STAR PRINT]

CONFIRMATION HEARING ON THE NOMINATIONS
OF CAROL E. DINKINS TO BE CHAIRMAN
OF THE PRIVACY AND CIVIL LIBERTIES OVERSIGHT BOARD AND ALAN CHARLES RAUL
TO BE VICE CHAIRMAN OF THE PRIVACY
AND CIVIL LIBERTIES OVERSIGHT BOARD

## **HEARING**

BEFORE THE

# COMMITTEE ON THE JUDICIARY UNITED STATES SENATE

ONE HUNDRED NINTH CONGRESS

FIRST SESSION

NOVEMBER 8, 2005

Serial No. J-109-48

Printed for the use of the Committee on the Judiciary



U.S. GOVERNMENT PRINTING OFFICE

30–391 PDF

WASHINGTON: 2006

### COMMITTEE ON THE JUDICIARY

ARLEN SPECTER, Pennsylvania, Chairman

ORRIN G. HATCH, Utah CHARLES E. GRASSLEY, Iowa JON KYL, Arizona MIKE DEWINE, Ohio JEFF SESSIONS, Alabama LINDSEY O. GRAHAM, South Carolina JOHN CORNYN, Texas SAM BROWNBACK, Kansas TOM COBURN, Oklahoma PATRICK J. LEAHY, Vermont EDWARD M. KENNEDY, Massachusetts JOSEPH R. BIDEN, Jr., Delaware HERBERT KOHL, Wisconsin DIANNE FEINSTEIN, California RUSSELL D. FEINGOLD, Wisconsin CHARLES E. SCHUMER, New York RICHARD J. DURBIN, Illinois

DAVID BROG, Staff Director
MICHAEL O'NEILL, Chief Counsel
BRUCE A. COHEN, Democratic Chief Counsel and Staff Director

## CONTENTS

### STATEMENTS OF COMMITTEE MEMBERS

Cornyn, Hon. John, a U.S. Senator from the State of Texas	Page 1 115 119
PRESENTER	
Hutchison, Hon. Kay Bailey, a U.S. Senator from the State of Texas, presenting Carol E. Dinkins, Nominee to be Chairman of the Privacy and Civil Liberties Oversight Board	2
STATEMENTS OF THE NOMINEES	
Dinkins, Carol E., of Texas, Nominee to be Chairman of the Privacy and Civil Liberties Oversight Board Questionnaire  Raul, Alan Charles, of the District of Columbia, Nominee to be Vice Chairman of the Privacy and Civil Liberties Oversight Board Questionnaire	4 5 52 54
QUESTIONS AND ANSWERS	
Responses of Carol E. Dinkins to questions submitted by Senators Durbin, Feingold, and Leahy	87 101
SUBMISSIONS FOR THE RECORD	
Durbin, Hon. Richard J., a U.S. Senator from the State of Illinois, Hon. Susan M. Collins, a U.S. Senator from the State of Maine, Hon. Joseph L. Lieberman, a U.S. Senator from the State of Connecticut, and Hon. Patrick J. Leahy, a U.S. Senator from the State of Vermont, joint letter Washington Post, August 8, 2005, article	117 122

NOMINATIONS OF CAROL E. DINKINS, OF TEXAS, TO BE CHAIRMAN OF THE PRIVACY AND CIVIL LIBERTIES OVERSIGHT BOARD AND ALAN CHARLES RAUL, OF THE DISTRICT OF COLUMBIA, TO BE VICE CHAIRMAN OF THE PRIVACY AND CIVIL LIBERTIES OVERSIGHT BOARD

### **TUESDAY, NOVEMBER 8, 2005**

U.S. SENATE, COMMITTEE ON THE JUDICIARY, Washington, DC.

The Committee met, pursuant to notice, at 2:30 p.m., in room SD-226, Dirksen Senate Office Building, Hon. John Cornyn, presiding.

Present: Senator Cornyn.

## OPENING STATEMENT OF HON. JOHN CORNYN, A U.S. SENATOR FROM THE STATE OF TEXAS

Senator CORNYN. The Committee will come to order.

I want to thank Chairman Specter for scheduling today's hearing. This hearing involves two very important positions recently created by the Congress. The Privacy & Civil Liberties Oversight Board was created based upon the recommendations of the 9/11 Commission, and is designed to oversee our Government's commitment to defend civil liberties while we do the work we need to do to find out who it is that is trying to hurt us. As the Chair and Vice Chair of this Board, both of you will fill vital positions within the Government. I hope we can get your nominations voted out of the Committee and through the Senate so you can get to work as soon as possible.

As a country, we cherish our civil liberties and we are committed to vigorously defend them, to ensure that we maintain our way of life. Congress works hard to try to strike the right balance, a careful and wise balance between national security and civil liberties. While this is not always easy, nor can we always claim to have gotten it exactly right, I do believe that we do so with the best interests of our Nation in mind, and that we do so in a manner that is both honest and in good faith.

That is why I am disappointed when we hear what turn out to be false reports or scare tactics about phantom civil rights violations. False reports and scare tactics serve no legitimate purpose, but they do a grave disservice to the American people. The war on terrorism must be fought aggressively, but consistent with protection of civil rights and civil liberties. Whenever real civil liberties problems do arise, we must learn about them right away so that

we can fix them swiftly.

Every false allegation undermines true allegations, and that hurts us all. If anything, false claims about civil liberties violations actually make it harder to monitor real civil liberties issues in the future, for the same reason that eventually no one listened to the little boy who "cried wolf." And that is why I encourage honest, responsible and fair discussions about the war on terrorism, civil liberties and the USA PATRIOT Act.

The Privacy and Civil Liberties Oversight Board will play an important role in this debate. Both of you will be expected to give honest, responsible and fair review of the development and implementation of laws, regulations and executive branch policies related to efforts to protect the Nation against terrorism, and you will also be expected to ensure that concerns with respect to privacy and civil liberties are appropriately considered. And I stand ready to work with both of you, and I know the Committee as a

whole does as well.

[The prepared statement of Senator Cornyn appears as a submission for the record.]

Well, I see we have the senior Senator from Texas here. I know she is eager to make an introduction, so let us turn to Senator Hutchison.

### PRESENTATION OF CAROL E. DINKINS, NOMINEE TO BE CHAIRMAN OF THE PRIVACY AND CIVIL LIBERTIES OVER-SIGHT BOARD, BY HON. KAY BAILEY HUTCHISON, A U.S. SEN-ATOR FROM THE STATE OF TEXAS

Senator Hutchison. Thank you, Mr. Chairman. I thank you for holding this hearing.

I am very pleased to be here with my friend, Carol Dinkins. Carol has been nominated to chair this Board, the Privacy and Civil Liberties Oversight Board, and I really cannot think of a bet-

ter person for this job.

I have known Carol for a long time. She is a leader, as you know, Mr. Chairman, in the legal field in Texas. She has worked with the law firm of Vinson Elkins through most of her career, and during her tenure there has become a leading expert in the United States in environmental law. She has represented clients across various industries, and has handled all aspects of client counseling from litigation to mediation and standard business transactions. She served on the firm's Management Committee and currently chairs the firm's administrative and environmental law practice.

In 1981, Carol left Vinson Elkins to serve as the Assistant Attorney General in Charge of the Environmental and Natural Resources Division in the Department of Justice. In this position she supervised the Government's litigation in Federal environmental, natural resources, Indian and public lands cases. In 1984, she became the Deputy Attorney General of the United States, the second ranking official in the Department of Justice. Her responsibilities included day-to-day management of the Department's 60,000 employees, as well as working with members of Congress, the White

House, the Cabinet, and sub-Cabinet officers.

Carol Dinkins is a member of the State Bar of Texas, the Federal Bar Association and the American Bar Association. She has also served as Chair of the ABA Standing Committee on the Federal Judiciary. Her active participation in the legal community has earned her many awards and recognitions, including being cited as one of the best lawyers in America.

I am proud that she hails from my alma mater, the University of Texas at Austin, where she earned her bachelor's degree, and

later attended the University of Houston for her JD.

I know that her experience in both the public and private sectors have prepared her to serve as the first Chair of the Privacy and Civil Liberties Oversight Board, and I am very pleased that she has been willing to accept this nomination.

And, Mr. Chairman, I know that your holding this hearing means that you also have an interest in expediting these confirmations so that we can get the Board set up and ready to go.

Thank you.

Senator CORNYN. Thank you very much, Senator Hutchison. I know you have other commitments, and I have already told our two nominees that we have stacked votes here in just a few minutes, we will soldier on the best we can. But thank you for being here and introducing Ms. Dinkins.

Since I have had the honor of also knowing Carol Dinkins for a number of years too, I will not repeat all the nice things that Senator Hutchison said, but just put me down as ditto for all those compliments, and I agree the President has chosen wisely as the Chair of this Board.

Our other nominee is Alan Raul, who is the President's nominee to serve as Vice Chair of the Privacy and Civil Liberties Oversight Board. He is a partner in the prestigious Washington, D.C. law firm of Sidley, Austin, Brown and Wood, and he too brings significant public sector and private sector experience to this job.

Mr. Raul's previously served at the White House as Associate Counsel to President Reagan. He has also served as General Counsel of the Office of Management and Budget, and as General Counsel to the U.S. Department of Agriculture. Mr. Raul, I am confident your past Government service will serve you well in this new position as well.

I welcome both of you here.

As I told Ms. Dinkins yesterday when she was in my office, just catching up after not seeing each other for a while, we had a chance for some informal conversation. I will tell you, Mr. Raul, what I told her yesterday. I said the fact that we do not have a packed audience here or packed members of the Senate Judiciary Committee here does not mean that they are not listening and not interested, because certainly they are and certainly their staff is here. But these days, given the contentious nature of some of our fights here on the Judiciary Committee in particular, the fact that this is not a packed dais up here is not a bad thing. It is probably a good thing.

I am hopeful that we will be able to, as Senator Hutchison and I have already said, move promptly on these nominations.

At this time I would like to turn now to Ms. Dinkins, and any opening remarks you would care to make, we would be glad to hear.

### STATEMENT OF CAROL E. DINKINS, NOMINEE TO BE CHAIR-MAN OF THE PRIVACY AND CIVIL LIBERTIES OVERSIGHT BOARD

Ms. DINKINS. Thank you, Mr. Chairman. I appreciate your kind words and those of Senator Hutchison as well. It is a great pleasure to be here today, and a privilege to be nominated by the President to Chair the Privacy and Civil Liberties Oversight Board, and if confirmed, I will be privileged to serve with Alan Raul, and Ted Olsen, Lanny Davis and Frank Taylor, all of whom are men of great distinction and of very considerable achievement and experience.

Having served as Assistant Attorney General for the Office of Legal Counsel, and more recently as Solicitor General of the United States, Mr. Olsen is well known to this Committee. I was fortunate to serve as an Assistant Attorney General when he was the head of the Office of Legal Counsel at the Department of Justice, and I sought his advice and counsel on a number of difficult matters. From that experience, I know that he is careful, measured and thoughtful, and he is thorough in his legal analysis. He is an independent thinker, and he is squarely grounded in the law.

Mr. Chairman, I would like to present Lanny Davis, who is behind me.

[Mr. Davis stood.]

Ms. DINKINS. Thank you, Lanny.

Lanny has a great depth of experience as Special Counsel to President Clinton, and that will be invaluable to the Board, which is housed within the Executive Office of the President.

The other member, Frank Taylor, who is here also, was a long-time career Air Force officer in the area of security, before he was Secretary of State, as Counterterrorism Coordinator, and he is now head of security at General Electric.

The breadth of this collective experience will assure that this Board is well suited to carry out the functions and the great responsibility that has been assigned it. We see that it will be a particular challenge to have the opportunity to be the first members of this Board, and if Alan and I area confirmed, to be the first Chair and Vice Chair. We will be shaping the organization of the Board and working with its members to develop and carry out the initial agenda.

If confirmed, my first priority as Chair, with Mr. Raul's very able assistance, will be to engage an Executive Director and to do what is necessary to get the Board up and running. We will convene as soon as possible to develop our agenda and set priorities, and an integral part of that agenda will be to reach out to those who are interested in this Board and its activities.

We would welcome the opportunity, if confirmed, to meet with members of Congress who may wish to share their views on the role and activities of the Board, and we look forward to reporting at least annually to the Congress on our major activities.

Thank you.

[The biographical information of Ms. Dinkins follows.]

### I. BIOGRAPHICAL INFORMATION (PUBLIC)

1. Full name (include any former names used.)

Carol Eggert Dinkins Carol Kay Eggert

2. Address: List current place of residence and office address(es.)

Office: Vinson & Elkins L.L.P. 2300 First City Tower 1001 Fannin Street Houston, Texas 77002

3. Date and place of birth.

November 9, 1945 Corpus Christi, Texas

4. <u>Marital Status</u>: (include maiden name of wife, or husband's name). List spouse's occupation, employer's name and business address(es).

Marital Status: Married Spouse's Name: Bob Brown

Spouse's Occupation: Retired Attorney

 Education: List each college and law school you have attended, including dates of attendance, degrees received, and dates degrees were granted.

The University of Houston Dates Attended: 1969-1971

Degree Received: Doctor of Jurisprudence

Degree Granted: 1971

The University of Texas School of Law

Dates Attended: 1968-1969 Degree Received: N/A Degree Granted: N/A

The University of Texas at Austin Dates Attended: 1964-1968

Degree Received: Bachelor of Science in Education

Degree Granted: 1968

- 6. <u>Employment Record</u>: List (by year) all business or professional corporations, companies, firms, or other enterprises, partnerships, institutions and organizations, nonprofit or otherwise, including firms, with which you were connected as an officer, director, partner, proprietor, or employee since graduation from college.
  - Principal Associate, Texas Law Institute of Coastal & Marine Resources and Adjunct Assistant Professor of Law, The University of Houston College of Law (1971-1973);
  - b. Vinson & Elkins 1973-Present, except while in Government;
  - c. The Nature Conservancy, Board of Directors (member 1996-2008): Chair (2004); Chair, Audit Committee (2005-06); Co-Chair, Government Relations and Volunteer Activities Committee (1996-2003);
  - d. The Nature Conservancy, Texas Chapter, Chair (1996-99), Trustee (1987-1996), Trustee Emeritus;
  - e. Houston Museum of Natural Science, Trustee (since 1986) and Executive Committee as Legal Advisor;
  - f. RESOLVE, Inc., Washington, D.C., Member of Board (since 2001);
  - g. Environmental and Energy Study Institute, Washington, D.C., Director (1986-1999):
  - h. Environmental Law Institute, Washington, D.C., Director (1985-1991);
  - National Ocean Industries Association, Washington, D.C., Director and Chair, Government and Public Affairs Committee (1986-1992);
  - Oryx Energy Company, Dallas, TX, Director (1990-1995);
  - k. University of Houston Law Foundation, Board of Directors (1996-98)

2492495\_1.doc

 Military Service: Have you had any military service: If so, give particulars, including the dates, branch of service, rank or rate, serial number and type of discharge received.

None.

- 8. <u>Honors and Awards</u>: List any scholarships, fellowships, honorary degrees, and honorary society memberships that you believe would be of interest to the Committee.
  - a. Margaret Brent Award for Women Lawyers of Achievement, awarded by the American Bar Association Commission on Women in the Profession (1999)
  - b. Inductee, Texas Women's Hall of Fame (2000)
  - c. University of Houston Law Alumnus of the Year (1984)
  - d. Outdoors Woman of the Year, awarded by Wonders of Wildlife (2000)
  - e. YWCA Outstanding Woman of the Year (Business) (1989)
  - f. Order of Barons, University of Houston Law School (1970-71)
  - g. Kate Stoneman Award, Albany Law School, Albany, New York (2003)
  - h. The Women's Council on Energy & the Environment, Woman of the Year (2001)
- Bar Associations: List all bar associations, legal or judicial-related committees or conferences of which you are or have been a member and give the titles and dates of any offices which you have held in such groups.
  - a. American Bar Association:

Board of Governors (2005-2008)

House of Delegates (since 1992)

- Chair, Rules & Calendar Committee (2000-2002) and Member (1996-98)
- Member Nominating Committee (1994-97, 1998-2005)

Board of Editors, ABA Journal (Member since 1998), Chair (2003-06)

Standing Committee on Federal Judiciary

- Chair (2002-03)
- Member (1997-98)

Fund for Justice and Education

- Council (2002-05)

Section of State and Local Government Law

- Delegate and Member of Executive Committee (1992-98 and 2004-05)
- Section Chair (1991-92)
- Various officer positions (1987-91)
- Section Council (1985-87)

Section of Environment, Energy, and Resources

- Delegate and Member of Executive Committee (1998-2004)
- Chair (1997-98)
- Officer (1995-97)
- Section Council (1991-94)

Litigation Section

- Chair, Environmental Litigation Committee (1989-92)

Special Committee on Energy Law (1983-84)

Section Officers Conference, Chair of Nominating Committee (1995-96)

President-Elect Mathis' Appointments Committee (2006-07)

President-Elect Greco's Appointments Committee (2004-05)

President-Elect Shestack's Appointments Committee (1996-97)

- b. American Bar Foundation Life Fellow
- c. The American Law Institute
- d. State Bar of Texas
- e. Texas Bar Foundation Sustaining Life Fellow
- f. Houston Bar Foundation Fellow
- g. Federal Bar Association
- h. International Bar Association
- i. Inter-American Bar Association
- j. Houston Bar Association: Chair, Environmental Law Section (1990-1992);
   Chair, Committee on the Environment (1990-1992)
- k. National Association of Former United States Attorneys
- Environmental Panel and Texas Panel, CPR Institute for Dispute Resolution
- m. Association of Attorney-Mediators
- n. Affiliate, Society of Professionals in Dispute Resolution
- Environmental and Energy Study Institute, Washington, D.C., Director (1986-1999)
- p. Environmental Law Institute, Washington, D.C., Director (1985-1991)

 Other Memberships: List all organizations to which you belong that are active in lobbying before public bodies. Please list all other organizations to which you belong.

The Nature Conservancy engages in some lobbying before public bodies.

Other Memberships:
Houston Museum of Natural Science
Houston Zoological Society
Memorial Drive Lutheran Church
Westview Terrace Civic Association
National Recreation & Park Association
University of Houston Law Foundation
University of Houston Alumni Association
Women's Environmental and Energy Study Institute

- 11. <u>Court Admission</u>: List all courts in which you have been admitted to practice, with dates of admission and lapses if any such memberships lapsed. Please explain the reason for any lapse of membership. Give the same information for administrative bodies which require special admission to practice.
  - a. Texas Supreme Court (admitted: 1971)
  - b. U.S. Supreme Court (admitted: 1973)
  - c. 5th Circuit Court of Appeals (admitted: 1973)
  - d. 9th Circuit Court of Appeals (admitted: early 1980s)
  - e. 10th Circuit Court of Appeals (admitted: early 1980s)
  - f. U.S. Court of Appeals for Federal Circuit (admitted: early 1980s)
  - g. U.S. Court of Appeals for District of Columbia (admitted: early 1980s)
  - h. Southern District of Texas (admitted: mid to late 1970s)
  - i. Northern District of Texas (admitted: late 1980s)
  - j. Eastern District of Texas (admitted: late 1980s)
  - k. Eastern District of Arkansas (admitted: late 1980s or early 1990s; allowed to lapse when I no longer had a case in Arkansas)

12. <u>Published Writings</u>: List the titles, publishers, and dates of books, articles, reports, or other published material you have written or edited. Please supply one copy of all published material not readily available to the Committee. Also, please supply a copy of all speeches by you on issues involving constitutional law or legal policy. If there were press reports about the speech, and they are readily available to you, please supply them.

Please see Attachment A, a list of publications.

13. <u>Health</u>: What is the present state of your health? List the date of your last physical examination.

Present state of health: excellent

Date of last physical examination: July 14, 2005

- 14. <u>Public Office</u>: State (chronologically) any public offices you have held, other than judicial offices, including the terms of service and whether such positions were elected or appointed. State (chronologically) any unsuccessful candidacies for elective public office.
  - State (chronologically) any public offices you have held, other than judicial
    offices, including the terms of service and whether such positions were
    elected or appointed.

Chair, Governor's Task Force on Coastal Zone Management (1979) Member, Environmental Protection Committee of the Interstate Oil Compact Commission (1979-81)

Chair, Governor's Flood Control Action Group (1980-81)

Assistant Attorney General, Environment and Natural Resources Division, U.S. Department of Justice, Washington, D. C. (1981-83) (PAS)

Board Member, National Consumer Cooperative Bank Board (1981) (PAS)

Chair, President Reagan's Task Force on Legal Equity for Women (1981-83) (Presidential appointment)

Deputy Attorney General of the United States (1984-85) (PAS)

Member, Legislature's Joint Select Committee on Judiciary, (1987-89) (Gubernatorial appointment)

Member, Native Hawaiian Study Commission (appointment)

Member, Policy Committee of the Galveston Bay National Estuary Program Management Conference (1988-1992) (Gubernatorial appointment)

Member, Task Force on Judicial Selection, Texas Legislature (1990) (Gubernatorial appointment)

Commissioner, Texas Parks & Wildlife Commission (1997-2002) (Gubernatorial appointment with Senate confirmation); Vice Chair (1999-2001)

Chair, Governor Bush's Conservation Task Force (2000) Member, Marine Protected Areas Federal Advisory Committee (2003-05) (appointment)

b. State (chronologically) any unsuccessful candidacies for elective public

I have never held, nor sought, any elective office.

### 15. Legal Career:

- a. Describe chronologically your law practice and experience after graduation from law school including:
  - whether you served as clerk to a judge, and if so, the name of the judge, the court, and the dates of the period you were a clerk;

N/A

whether you practiced alone, and if so, the addresses and dates;

N/A

 the dates, names and addresses of law firms or offices, companies or governmental agencies with which you have been connected, and the nature of your connection with each;

The University of Houston 4800 Calhoun Road Houston, Texas 77204 1971-1973

Vinson & Elkins L.L.P.
2300 First City Tower
1001 Fannin Street
Houston, Texas 77002
Associate (1973-1979)
Partner (1980-1981, 1983-1984, and 1985-present)

Assistant Attorney General U.S. Department of Justice Environment and Natural Resources Division Washington, D.C. 1981-1983

Deputy Attorney General U.S. Department of Justice Washington, D.C. 1984-1985

Director Oryx Energy Company Dallas, Texas 1990-1995

Texas Parks & Wildlife Commission 4200 Smith School Road Austin, TX 78744 1997-2002 (Commissioner), 1999-2001 (Vice Chair) b. 1. What has been the general character of your law practice, dividing it into periods with dates if its character has changed over the years?

From 1971 to 1973, I served as Associate, then Principal Associate, of the Texas Law Institute of Coastal & Marine Resources. I organized conferences, participated in agency meetings, and wrote and published articles and other materials. I also taught research and writing courses as an Adjunct Assistant Professor of Law.

From 1973 to 1981, I represented clients in obtaining governmental authorizations of projects and in counseling on compliance activities. I worked on matters involving, among others, the CWA, CAA, ESA, NEPA, MPRSA, CZMA, 1899 Rivers and Harbors Act, NHPA, FLPMA, OCSLA, and state analogs. I obtained permits for significant navigation projects, industrial facilities, pipelines, dams, levees, drainage projects, and residential waterfront canal developments. I also represented clients in flood plain matters.

As Assistant Attorney General for the Environment and Natural Resources Division, I supervised the government's litigation in federal environmental, natural resources, and public lands matters. During my tenure, the Division implemented the Comprehensive Environmental Response, Compensation, and Liability Act (also known as Superfund) and created the Environmental Crimes Unit, subsequently a section.

In 1984, I was appointed Deputy Attorney General of the United States, the second-ranking official in the Department of Justice, responsible for the day-to-day management of its 60,000-plus employees.

When I returned to private practice in 1985, I added CERCLA and RCRA to my practice portfolio. I assist clients with compliance matters, including counseling, internal investigations, and negotiation of judicial and administrative settlements or other disposition of enforcement actions.

Describe your typical former clients, and mention the areas, if any, in which you have specialized.

My clients and former clients consist of energy and petrochemical industries, transportation interests, developers, state and local governmental entities and, occasionally in prior years, individuals who were involved in regulatory or enforcement matters.

My principal area of practice is environmental law, a field for which specialization is not certified.

c. 1. Did you appear in court frequently, occasionally, or not at all?

If the frequency of your appearances in court varied, describe each such variance, giving dates.

I appear in court very infrequently.

- 2. What percentage of these appearances was in:
  - (a) federal court;

90% is a very general approximation.

(b) state courts of record;

10% is a very general approximation.

- (c) other courts.
- 3. What percentage of your litigation was:
  - (a) civil:

A very general approximation is 80%.

(b) criminal:

A very general approximation is 20%.

 State the number of cases in courts of record you tried to verdict or judgment (rather than settled), indicating whether you were sole counsel, chief counsel, or associate counsel.

A handful, at most, some as second chair.

5. What percentage of these trials was: (a) jury;

0%.

(b) non-jury:

100%.

16. <u>Litigation</u>: Describe the ten most significant litigated matters which you personally handled. Give the citations, if the cases were reported, and the docket number and date if unreported. Give a capsule summary of the substance of each case. Identify the party or parties whom you represented; describe in detail the nature of your participation in the litigation and the final disposition of the case.

Also state as to each case:

- (a) the date of representation;
- (b) the name of the court and the name of the judge or judges before whom the case was litigated; and
- (c) the individual name, addresses, and telephone numbers of co-counsel and of principal counsel for each of the other parties.

The cases that I litigated are so old that I have been unable to locate files or other information.

- 17. <u>Legal Activities</u>: Describe the most significant legal activities you have pursued, including significant litigation which did not progress to trial or legal matters that did not involve litigation. Describe the nature of your participation in this question, please omit any information protected by the attorney-client privilege (unless the privilege has been waived).
  - A. In United States v. Texas Eastern Transmission Company, No. 89-6307, in the Southern District of Texas before Judge Ewing Werlein, I was lead counsel to Texas Eastern, a natural gas transmission company. I headed the team that negotiated a consent decree to address remediation of approximately five dozen sites in 14 states and 6 EPA regions. Four states sought to intervene after lodging of the consent decree, which the Fifth Circuit denied. 923 F.2d 410 (1991). For the United States, Brian Donohue at United States Department of Justice (telephone number: 202-514-5413).
  - B. In United States v. Occidental Chemical Corporation, No. 89-5064 (1990), I negotiated the consent decree under which remedial design/remedial construction has now been accomplished at 80/120 Lister Avenue in Newark, New Jersey, decree entered by Judge Bissell. Counsel for the United States was Jerry Schwartz, United States Department of Justice. In 1994, I negotiated an administrative order on consent with EPA, Region 2, for the conduct of an RI/FS in 6 miles of the Lower Passaic River. In 2004, I negotiated another administrative order on consent to conduct an RI/FS in Newark Bay. Counsel for the 1994 Order is Patricia Hick, EPA, Region 2 (telephone number: 212-637-3137); and for the 2004 Order, Amelia Wagner, EPA, Region 2 (telephone number: 212-637-3141). This remains a very active matter.
  - C. In *United States v. ATOFINA Chemicals, Inc.*, O1CV7087, I negotiated a multi-media consent decree that covered half a dozen plants in three EPA regions. Adam Kushner, former DOJ, now EPA, lawyer was counsel to the government. Honorable Norma Shapiro, E.D. Pa., was the judge.

- D. I was lead counsel for BP Exploration (Alaska) Inc. in negotiating a global settlement of a case involving waste disposal at Endicott Island. I negotiated the Plea Agreement, Case No. A99-0141-CR (JKS), a civil settlement, and a voluntary compliance agreement with EPA's Office of Suspension and Debarment. After sentencing, I represented the Company in implementation of the Plea Agreement and Compliance Agreement. This case concluded in February 2005. Counsel for the United States were Timothy Burgess and Deborah Smith of the United States Attorney's Office in Alaska (telephone numbers: 907-271-5071 [Burgess]; 907-271-3389 [Smith]). This case was in Judge Singleton's Court.
- E. In United States v. Fina Oil and Chemical Company, in the Eastern District of Texas, I negotiated a plea agreement regarding oil spills in the Neches River. I also handled the sentencing hearing before Judge Schell. Former Assistant United States Attorney Tom Kienhoff represented the government.
- F. In the late 1970s, I was lead counsel in obtaining federal and state permits to construct a deepwater port in Galveston.
- G. Also in the late 1970s, I was lead counsel for a consortium of energy companies in obtaining federal and state permits and other authorizations to construct a liquid propane gas facility and navigation improvements near Sabine Pass, Texas.
- H. Since 1999, I have been lead counsel for the Pacific Lumber Company in seeking adaptive management changes to the Headwaters Habitat Conservation Plan in northern California.
- I. In the 1970s, I obtained permits for construction of a water front canal residential subdivision. Some aspects were litigated; I served as second chair and have not been able to locate files.

# ATTACHMENT A TO QUESTIONNAIRE FOR NONJUDICIAL NOMINEES

## 12. Published Writings:

PUBLICATIONS	TITLE	COPYRIGHT	AUTHOR
8 Houston L. Rev. 322	Comment, Survey of Bankruptcy Law in the Fifth Circuit	1970	Carol E. Dinkins
10 Houston L. Rev. 43	Texas Seashore Boundary Law: The Effect of Natural and Artificial Modifications	October 1972	Carol E. Dinkins
28 Oil & Gas Inst. 181	Governmental Land Use and Environmental Constraints to Consider in Planning New Projects	Matthew Bender 1977	Carol E. Dinkins
22 The Landman, No. 5	Developing Concerns of Coastal Regulatory Programs Affecting Energy Operations	May 1977	Carol E. Dinkins
Barrister	The Federal Zoning Program: Regulation of Flood Plain Use Under the National Flood Insurance Act	Spring 1978	Carol E. Dinkins
1Pace Env. L. Rev. 1	Enforcement of the Statutes Governing Disposal and Cleanup of Hazardous Wastes	Winter 1983	Carol E. Dinkins
14 Env. L. Rev. Rep. 10398	Shall we fight or will we finish: Environmental dispute resolution in a litigious society,	November 1984	Carol E. Dinkins

PUBLICATIONS	TITLE	COPYRIGHT	AUTHOR
Cambridge Energy Forum	Mergers and the Administration, The Reshaping of the Oil Industry—Just Another Commodity	1985	Carol Dinkins
Corporate Practice Commentator 460, 27 S. Tex. L. Rev. 460	A Return to Reason	Fall 1986	Carol E. Dinkins
24 Houston L. Rev. 5	Introduction to Symposium—Rethinking Tort and Environmental Liability Laws: Needs and Objectives of the late 20th Century and Beyond	January 1987	Carol E. Dinkins
8 Corporate Counsel Review 71	The Changing Environment of Environmental Regulation	November 1989	Carol E. Dinkins
Private Investors Abroad – Problems and Solutions in International Business, Chapter 5	Portents for Environmental Law and Policy in a New Administration and a Changing Decade	Annual 1989	Carol E. Dinkins, Carolyn White
13 The Nat'l L. J. 19	Interest in Mitigation Increases, Clean Water	February 4, 1991	Carol E. Dinkins
13 The Nat'l L. J. 34	Government Lawyers Shape Debate on Land Use.	August 12, 1991	Carol E. Dinkins
Washington Legal Foundation, Volume 6 No. 32, Legal Backgrounder	Environmental Violations: What You Should Know About Avoiding Criminal Sanctions,	November 15, 1991	Carol E. Dinkins

PUBLICATIONS	TITLE	COPYRIGHT	AUTHOR
1992 Wiley Construction Law Update, Chapter 1, pages 3-38	Emerging Environmental Issues	1992	Carol E. Dinkins Kimberly Z. Lesniak
CMJ ALI-ABA, Course Materials Journal, Page 31	Comprehending Natural Resources Damage Claims	December 1992	Carol E. Dinkins
9 Env. Forum 30	Business Needs to Retain Flexibility	September/October 1992	Carol E. Dinkins
The Landman	Avoiding Criminal Sanctions Through Effective Compliance Auditing	November/December 1993	Carol E. Dinkins
25 Env. Rep. 1320	Criminal Enforcement of Wetlands Protection law	November 3, 1994	Carol E. Dinkins Thomas R. Bartman
47 Admin. L. Rev. 337	Impact of the Environmental Justice Movement on American Industry and Local Government	Summer 1995	Carol E. Dinkins
BNA Books	Environmental Criminal Liability: Avoiding and Defending Enforcement Actions	1995	Carol E. Dinkins, Contributing Author
10 The Nat'l Law J.C12	Hot issues include green house gases, utility deregulation	August 4, 1997	Carol E. Dinkins
West Group	Business and Commercial Litigation	1998	Carol E. Dinkins, Arthur E. Murphy Contributing Authors

2507161\_1.DOC

PUBLICATIONS	TITLE	COPYRIGHT	AUTHOR
29 Seton Hall L. Rev.60	New Solutions for Old Problems in Newark Bay	1998	Carol E. Dinkins Kristie Tice
41 Houston L. Rev. 237	A tribute to Professor G. Sidney Buchanan upon his retirement	Summer 2004	Carol E. Dinkins
The Practical Real Estate Lawyer	An Ethics Overview (And Update) for The Environmental Lawyer	March 2005	Carol E. Dinkins

2507161\_1.DOC

#### II. FINANCIAL DATA AND CONFLICT OF INTEREST (PUBLIC)

List sources, amounts and dates of all anticipated receipts from deferred income
arrangements, stock, options, uncompleted contracts and other future benefits
which you expect to derive from previous business relationships, professional
services, firm memberships, former employers, clients, or customers. Please
describe the arrangements you have made to be compensated in the future for any
financial or business interest.

I will continue to practice law with Vinson & Elkins L.L.P.

Explain how you will resolve any potential conflict of interest, including the
procedure you will follow in determining these areas of concern. Identify the
categories of litigation and financial arrangements that are likely to present
potential conflicts-of-interest during your initial service in the position to which
you have been nominated.

The Board will have counsel for ethics questions. Until the Board is organized and functioning we cannot identify categories of conflicts. I have taken steps to assure that my investment portfolio is constituted so that trades are not made in my accounts without my knowledge. I will consult with ethics counsel and recuse where appropriate.

3. Do you have any plans, commitments, or agreements to pursue outside employment, with or without compensation, during your service in the position to which you have been nominated? If so, explain.

I will continue to practice law with Vinson & Elkins L.L.P.

4. List sources and amounts of all income received during the calendar year preceding your nomination and for the current calendar year, including all salaries, fees, dividends, interest, gifts, rents, royalties, patents, honoraria, and other items exceeding \$500 or more. (If you prefer to do so, copies of the financial disclosure report, required by the Ethics in Government Act of 1978, may be substituted here.)

A copy of SF-278 is attached.

2492495\_1.doc

- Please complete the attached financial net worth statement in detail (add schedules as called for).
- 6. Have you ever held a position or played a role in a political campaign? If so, please identify the particulars of the campaign, including the candidate, dates of the campaign, your title and responsibilities.
  - As Co-Chair of Lawyers for Bush-Cheney, I oversaw and assisted in recruiting volunteer lawyers to be available for assisting with possible contested election matters in November 2004.
  - 2. Senator Phil Gramm
    - a. Host committee member, Texas Size Salute, 1996
    - b. Friends of Phil Gramm Finance Committee, 1996
  - 3. Senator Kay Bailey Hutchison
  - Carole Keeton Rylander, candidate for Texas Comptroller, Woman's Event 1998
  - Member, Steering Committee for Judge Jane Bland, 281st District Court, 1998
  - Houston Finance Committee, Texas Supreme Court, Justice Deborah Hankinson, 1997
  - 7. Campaign Steering Committee, State District Judge Pat Mizell, 1996
  - 8. Greg Abbot Campaign for 129th District Court

#### III. GENERAL (PUBLIC)

An ethical consideration under Canon 2 of the American Bar Association's Code
of Professional Responsibility calls for "every lawyer, regardless of professional
prominence or professional workload, to find some time to participate in serving
the disadvantaged." Describe what you have done to fulfill these responsibilities,
listing specific instances and the amount of time devoted to each.

I perform *pro bono* activities for the Houston Museum of Natural Science and, to a lesser extent, The Nature Conservancy.

### Houston Museum of Natural Science

I serve as general counsel, directing queries to the appropriate lawyers in the Firm, counseling the Museum on various issues, and participating in Executive Committee meetings to advise the Board on matters needing assistance of counsel.

### The Nature Conservancy

From time-to-time I have given counsel on disputes, policies relevant to governance or legal issues, and legislation.

2. Do you currently belong, or have you belonged, to any organization which discriminates on the basis of race, sex, or religion - through either formal membership requirements or the practical implementation of membership policies? If so, list, with dates of membership. What you have done to try to change these policies.

No, not to my knowledge.

### FINANCIAL STATEMENT

### NET WORTH

Provide a complete, current financial net worth statement which itemizes in detail all assets (including bank accounts, real estate, securities, trusts, investments, and other financial holdings) all liabilities (including debts, mortgages, loans, and other financial obligations) of yourself, your spouse, and other immediate members of your household.

Various entries are approximate amounts.

ASSETS				LIABILITIES		
Cash on hand and in banks		400	000	Notes payable to banks-secured		
				None		
				None		
U.S. Government securities-add schedule				Notes payable to banks-unsecured		П
None				None		
Listed securities-add schedule				Notes payable to relatives		
Schedule A	2	185	787	None		
Unlisted securities—add schedule				Notes payable to others		
None				None		
Accounts and notes receivable:				Accounts and bills due Approximately \$20,000/month	20	000
None						

Due from relatives and friends	T	Τ	Τ	Unpaid income tax			Γ
None				Taxes are current			
Due from others	<b>†</b>	$\dagger$	T	Other unpaid tax and interest			
None				All taxes are current			
Doubtful			T	Real estate mortgages payable-add schedule			
None				Bank of America, mortgage on rural property, Lavaca County, Texas		90	000
·				Bank of America, mortgage on weekend home, Jamaica Beach, Texas		155	000
Real estate owned-add schedule		T	T	Chattel mortgages and other liens payable			
Schedule B	1	646	700	None			
Real estate mortgages receivable			-	Other debts-itemize:	$\neg$		
None				None			
Autos and other personal property		80	000				
Cash value-life insurance							
None							
Other assets itemize:					$\dashv$	$\dashv$	
VE Capital Account		475	000		l	-	
Variable annuities		460					
VE Defined Benefit Plan		250	000				
VE Deferred Compensation Plan	2		400				
City of Houston Defined Benefit Plan		- 1	300				
Family Partnership fractional interest		10	000				

				Total liabilities		265	500
				Net Worth	7	318	187
Total Assets	7	583	187	Total liabilities and net worth	7	848	187
CONTINGENT LIABILITIES				GENERAL INFORMATION			
As endorser, comaker or guarantor				Are any assets pledged? (Add schedule)			
On leases or contracts				Are you a defendant in any suits or legal actions?	-		
Legal Claims				No  Have you ever taken bankruptcy?  No			
Provision for Federal Income Tax							
Other special debt	·				-		

## 28

## SCHEDULE A

## **Listed securities**

Amegy Bancshares	\$63,000
Sears, Roebuck	1,250
Compass Bank 529	11,000
Fidelity Select Energy	23,000
Goldman Sachs Mid Cap Value	11,250
Harbor International	20,000
Ing Senior Income	34,000
Nation's Marisco Growth	22,000
Nation's Value Investor A	20,000
Royce Total Return Fund	11,000
Third Avenue International Value	32,000
Van Kampen Real Estate	146,000

Equities	AND THE THE TENED OF THE THE TENED OF THE	APPLICATIONS A UNIT OF THE PERSON OF THE PER
Common Stocke	Management of a management of a	
COMMISSING STOCKS	The contract of the contract o	
	ABBOTTIABS COM	08.7.7.2.80
	Dwidend-Option: Cash	to de mark a state des
	Security Identifier. ABT.	
	Allytate	11 077-06
	Dandood Option Coch	1,007,000
	secuny idenimer. All.	and the state of t
	AON-CORPORATION	15:430:48
	Dwident Ontob. Cach	A fact comparison of account of control
	Seamy Ideniner. AUI.	
	ARCHER-DANIELS-MIDLAND CO	12.527.28
	Dividend Ontion Cach	
		4
	SECURITY IOERINET. AUM	The second secon
	BAXTER-INTERNATIONAL-INC	-67-210 11
	(CINITETION ) DOGO	Note that any state of the stat
	Control of the contro	
	UNIGERA OPTION CASH	property and a sound of the sou
	Security Identifier BAX	
	ROBINCEOLOGIA	
	Designation of the second seco	(Marga77'C)
	CWIGHT CONOT CAST	to the Management of the second
	Security Identifier. BA	sugarinate of a
	BRISTOF-MYFRS COURR CO. COM.	
	Designation of the second seco	76'ccc'n,
	Night of the state	Contract and contract of the c
	Security Identifier. BMV	The same than the adjustment and other than the same terms of the
	CHEVRON-CORP-COM	- Contract
	Distance Contract Carlo	CONTRACTOR OF THE CONTRACTOR O
	CHARGE COUNTY CONTRACTOR OF THE PROPERTY OF TH	
	Security Identified CNA	
	CHUBB-CORP	12 BAC-CE
	DINGERT OF THE PROPERTY CACHE	TO A COLOR OF THE
	The second secon	The state of the s
	Secunty Identifier: CB	
1	CONAGRA-FOODS-INC	SC CC C
	Dividend Onton: Cach	and the state of t
	Considered and the second seco	a a de gallandiga Universitation
	SECURIA TORNING CONTRACTOR CONTRA	in the state of th
	CONOCOPHILIPS	14,681,10
	Dividend Option: Cash	COLUMN CONTRACTOR CONT
	Secum Identifier (Ap	
,	the state of the s	

	e experimente de manimente en manimente en mante à en contra de maniment de maniment de maniment de maniment d La companya de la companya de la compte de maniment de maniment de la companya de maniment de manim	
Kaniffac		
Property of the second	A STATE OF THE PROPERTY AND A STATE OF THE S	
Common-Stocks	Section 9 http://www.selementer.com/	and light to the
POUX THOUSE TO SEE THE SECOND	Transformation and an analysis of the following property of the follow	***
descenses a second of the seco	the state of the s	The same of
Dividend Opton: Cash	many terms or service and descriptions of the property of the	í
Security Identifier XOM	and the second s	٠
COLUMN INCLUMENTAL	W. L. M. W. L. C.	
The first the second of the se	The state of the s	
LIST THE PROPERTY OF THE PROPE	A condession of a condession and position of the condession of the	
Security despited. FPL	contraction to the plan for the re-	
HARTFORD FINE SVCS GROUP INC COM	12.655.88	
- Dividend Option: Cash	The stripe of the property of the stripe of	
Cantification PIC	Antithonous and a production of the state of	
Application of the following the second of t	The state of the s	
HEWERT-PACKARD TO COM	16,585,60	
Dwidend Option: Cash	CONTRACTOR CONTRACTOR AND	
Sequity Identifier HPO	a numerous production of the state of the st	
THE TAXABLE DAILY CONTRACTOR OF THE PARTY OF	THE PROPERTY OF THE PROPERTY O	
MONTHUM DANGER D	10,515,73	
Lividend Option: Cash.	OF The Control of the	
Security Identifier HBAN	in a control of production designation are an executive	
INTERNATIONAL BUSINESS MACUS CORP	A Principle of the Control of the Co	
THE WILLIAM TO THE PASSIVE OF THE PA	907.7841.	
CONTRACTOR OF THE PROPERTY OF	The state of the s	
- Dividend Option: Eash	TO THE REAL PROPERTY AND ADDRESS OF THE PROPERTY OF A PROPERTY OF THE PROPERTY	
Seauth Identifier Bild	the endistration of a south throughout the end of the the end	
TOTAL CONTROL OF THE PARTY OF T	And the second s	
WHITE THAT LOAK	10,179,63	
- Uwdend-Option: Cash	a to before the training a	·
Securicidentine: KMB	and the same of th	
FINETCH-DDAING-IAIT	Name of the state	
THE CONTROL OF THE PARTY OF THE	95150'01	
- Waderla-Duon: Cash	to constitutional and	
Seanty Identification 110	The state of the	
MATTELING		
Dividend Option Cash	07114676	
Carminellandifore		
The state of the s		
WEREK-CO-INC	9,659,55	
Lividend Option: Cash	The States of the States and Stat	,
Security Identifier MRK	An analysis and a second of the second of th	
MORGAN STANIEY COM	20 TEA	
And the second s	-11,544,06	
i	AN (1)	
security-denutries: MWD-	n negoting	
PRIZERINCCOM	1037758	,
Dividend Option: Cash	1 - Ale affiliance (1990) de	
Security Identifier. 255	Security County + + + +	
CECTOMMINICATIONS		
THE CALCULATION AND THE CA	11,481.53	
Third Charles Control of the Control	A TO THE TOTAL T	1
Security Identifier, SBC	And the contraction and the contraction of the cont	
The second of th	manual to the	-

Common Stocks  SAFEWAY INC COM NEW  Common Stocks  Security Identifier: SNY  UNION TACKETC CARRY  UNION TACKETC CARRY  UNION TACKETC CARRY  UNION TACKET CARRY  UNION	AND THE PROPERTY OF THE PROPER	des Printeres and another the form of the Backwards designed and the contract of the contract	The state of the s
SAFEWÄY INC COM NEW  Dwydend Option Cash Security Identifier. SWY UNION PACHEC CORP. TOM  UNION COMMUNICATIONS COM  Security Identifier. UNI  WACHOVIA CORP. (NEW) COM  UNACHOVIA CORP. (NEW) COM  UNACHOVIA CORP. (NEW) COM  Dwidend Option. Cash  Security Identifier. WW  WERHAEUSER. CO  Dwidend Option. Cash  Security Identifier. WW  WYETH  UNION Cash  Security Identifier. WW  WYETH  Dwidend Option Cash  Security Identifier. WW  WYETH  Security Identifier. WY  WYETH  Security Identifier. WY  Securit	Asia de grandy	BOOKERS CONTRACTOR OF PROPERTY CONTRACTOR OF THE PROPERTY OF T	the state of the s
SAFEWAY INC COM NEW  Dundend Option: Cash Security Identifier - SWY UNION PACIFIC CORP COM  UNION CORPUTATIONS COM  UNACHOUR CASH  Security Identifier: VIV  WASHINGTON-MUTUALINC  Dundend Option: Cash  Security Identifier: VIV  WERHAEUSER-CO  Dundend Option: Cash  Security Identifier: VIV  WERHAEUSER-CO  Dundend Option Cash  Security Identifier: VIV  WYETH  Dundend Option: Cash  Security Identifier: VIV  WYETH  Security Identifier: VIV  WYETH  Security Identifier: VIV  Security Identifier: VIV  WYETH  Security Identifier: VIV  Security Identifier: V	Books are	service operation to the proposition of the proposi	
SAFEWÄY IÑC COM NEW  Dwidend Option Cash Security Identifier SWY UNION PACIFIC CARP TOM UNION PACIFIC CARP TOM UNION PACIFIC CARP TOM UNION PACIFIC CARP TOM UNION COMMUNICATIONS COM Dwidend Option: Cash Security Identifier. VIB WACHOVIA CORP (NEW) COM Dwidend Option: Gash Security Identifier. VIB WASHINGTON-MUTUAL-INC Dwidend Option: Cash Security Identifier. VIB WYERHAEUSER-CO Dwidend Option: Cash Security Identifier. WW WYERH Dwidend Option: Cash Security Identifier. WW WYERH Security Identifier. WW WYERH Security Identifier. WW Security Identifier. WW WYERH Security Identifier. WW Security Identi		distantial popular programs were presented and a second of the second of	
57.187.7.  1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1		the result of the section of the sec	TT BAG AN
10.78.7. (1.7.1	TRANSPORT - COMPACT	a first to the sea of the content of the season of the sea	The state of the s
7.184.0 10.799.156 10.795.167 10.795.16	Dwideng Option: Cash	the definition of the property of the contract	and and an interpretation of an experimental properties on
10.291.73  10.291.74  10.291.75	The second secon	a sent administration occurs Mandaladed accidency a continuous security and a	the company of the contract of
10.784.40 10.794.40 10.794.40 10.794.40 10.795.44	Securification Securi	the fact of the company of the property of the company of the comp	the second of th
10.216.201  10.216	TINION DATIFICATION TO MAIN	many front of the proposed contraction and contraction and contraction of the contraction	97, F.79, St.
6.7.10.1 6.7.10	CHECK TOWN THE WALLS WITH THE WALLS	What we give any unity a fire country tends the december of quadratic and the companion (security on	
10.791.25 10.791.25	Dividend-Option: Cash	the production of the special control of the production of the control of the con	Angel modeleds of the many on the sensor special sequences commences and sequences
2.105.101	The state of the s	to him and a special paper from the company of the special paper of the	file , collective when we are a special special special special special states and the special
UALING UA	SACOTHY TOBUMERS TO THE COMMENT OF THE COMENT OF THE COMMENT OF TH	THE WATER AND ADDRESS OF PERSONS STANDARD AND ADDRESS OF THE PROPERTY OF THE PERSONS AND ADDRESS OF THE PERSONS AD	en state and the state of the commence of the state of th
WEWY COM- 10,279,44  UAI-ING 10,793,75  ON 10,793,75	CA-ONCERVINIBIES CONTRACTION .	distribution of the state of th	The state of the s
UALING		THE OF SHALL DE ARTHUR PROPERTIES AND PROPERTIES AND THE WHITE YOU SHALL SHAPE AND THE PROPERTY OF THE ARTHUR SHAPE AND THE	ac iconstitution and action of the contraction of t
NOTING THE PROPERTY OF THE PRO	•	temphological to the accessorate separation by the seconds. It reported infrares and production of the contract of	As younger as a financial state to refer to a first interest the state and the subjection between the first parties to
NOTION OF THE PROPERTY OF THE	The same of the sa	market an experimental expensive for the property of the property of the property of the party o	c1. p. extraorcy-manacounts resources properties and a second of the
NALING COMPANY OF THE PROPERTY	SECULIFICATION ALEGANISTIC CONTROL OF THE CONTROL O	the form the second	reforests as a second entertainment of the company and a second of the determinant of the company of the compan
NOTION AND AND AND AND AND AND AND AND AND AN	MACHONIA-COOP-MENA-COM	Mechanism College of the College of	The state of the s
WALNE CONTRACTOR OF THE PROPERTY OF THE PROPER	TO ATTO SON CONTRACTOR OF THE PARTY OF THE P	teleprometeres amont encompanion or state and an action of the second second second second second second second	++°C/7′O
NOTION AND ADDRESS OF THE PROPERTY OF THE PROP	Dividend Option: Cash		A thin could come to make the many property at factor property out of the could be a second
NOTING	•	more than the state of the same of the sam	
UALINC		the state of the s	
8. (1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1	WACHINGTON MITHIALING		. '
And the second s	NEW TOTAL AND ADDRESS OF THE PARTY OF THE PA		
	Dividend Option: Cash	e és	TOTAL OF THE PROPERTY OF THE P
The second secon	The state of the s	d t	the second of the problems of the control of the co
The second secon	Secunty Identifier. WIM	4	to a substitute of the contract of the contrac
The second secon			- Particular of the Special of Association Control of the Special
	WETERHARDSEN CO	of the same of payment of the same of the	
The control of the co	Dwidend Onton Cach	and the Control and the state of the control of the	the second secon
The second secon	יייייי ייייייייייייייייייייייייייייייי	and the state of t	. Commence and the second seco
The control of the co		The state of the forther the statement of the statement o	
The state of the s		•	States and the company of the company of the state of the
The second secon		HERMAN SECURE AND SECU	12.585.44
The state of the s	Dividend Ontion: Cach	Multiproportion description and a company	AT THE PART OF A STATE OF THE PARTY OF THE P
The second section of the section of the second section of the section of the second section of the sectio	THE COUNTY AND THE PARTY OF THE	professional and and the second secon	The Production of Springer or reason management of opposite the company of
The second secon	Security Identifier WYE	Principal and part of the second seco	COVER, AND MAIN TO THE STORM THE COMMISSION CONTROL OF THE PARTY PROPERTY CONTROL OF THE CONTROL
The state of the s	VCDAV CASSANATION	diction and anti-section of course course contract of the section	THE RESERVE THE PROPERTY OF TH
Service and the service and th	ACRUA CURPURATION	State or one or companies a contract or description or	9,350.25
e de la companya del companya de la companya del companya de la companya del companya del companya del companya de la companya del com	Daidend Onton: Cach	tion and the proof of the proof	Committee of the commit
efficient major profess majoral delighter management profess carry of a supplication from a		Martin and the second of the s	THE TOTAL CONTRACTOR FOR CONTRACTOR OF THE CONTR
	,	Contract of the state of the st	The state of the s

	FRESH DELMONTE PRODUCE	•	A 727 ED.	
042000			4,763,30	
й <b>=</b> а ч <b>с</b> -	Dividend Dotton: Cash	ě	r ·	
	ecumy/dentifier FDP		March Control	
<b>a v v</b> .	PCHOLDINGS LTD		5.877.00	1 :
<b>Й С</b>	Dwidend Option: Cash -		1000	
	Security Identifier - IPCR		a de la company	
	ORTHOFIX INTL NV ISIN#ANN67481 1027	May a special to the state days	10 Pb1 L	
	Director of Charles Castering Control of Castering	Management of the control of the con	(A. delicable)	
, c	Section of the sectio	•	A CONTRACTOR OF THE CONTRACTOR	
4 1	permits inemitted. Units		the self-control for the confidence as a confidence of the confide	
^	STEINER LEISURE TID	í	6,963,85	
٥	Dividend Option: Cash	e ·	The second secon	
J	Sacretifier CTAID	all reason in	* * * * * * * * * * * * * * * * * * *	
ñ •	Assemble and a second s	And a second		
₹	ACULT BRANDS INC COM	100000000000000000000000000000000000000	6,527.40	554
<u>م</u>	Dividend Option: Cash		The state of the s	
ڻ	Commy Identifian AVI			* ****
× •				
₹	HOVE INC.		5,319.30	
a	Dwidend Option: Cash		4	
	Security Irlantifiar 4P			
, ·			· Output in	
	TECHENICA-TIME CORP. COM		6,993.80	
<u> </u>	Juidend Option Cash	*	An experience of the contract	post reco
250	an unividentifier A.C.		The transfer of the second	
				. '
₹ :	AMERICA INC. NEW COM.		4,941.55	
۵	Swideng Option: Cash			1 1
J. J.	Action Identifies AME	,		and the second second
( ·	AND PROPERTY OF THE PROPERTY O			2
4	AMIN HULLINGS INC. ISIN#US0315381014		2,490.60	
á	wdend-Option: Cash-	•	The second	
32	Security dentifier AMIS		Company and as	
*	DDITOCALING	4		
-			09.575.0	
ລັ	Jwdend-Uption: Cash		1	112 27
3.	security Identifier ARB		The state of the s	
ä	ARCH CHEMICAL CINC COM	,		1
	Action Courses Courses		A LONG	
	DIVIDENCE CONTRACTOR C	4 .	The second second	
**	equity Identities. ARI			
The second to th		1	*	;
* 0.045		*	1. T.	

|   |                               | A STATE OF THE PROPERTY OF THE | Total control of the | to Automotivation and the Company of |                         | And the second s | A company of the comp | теления в предоставления в предоставлен  |     | to the second se | Control of Administration and Administration of the Administration | Contract Con | o chi shaka in late a chimbelli shaka mala asi abiquing ang ang ang an | The contract of the contract o | A PART OF THE PART | A Digitation is a proper production of the control | TO THE PROPERTY OF THE PROPERT | The second design of the secon | 100 to the contraction of the co | The state of the s | The section of the se | The second secon | And the state of t | Accorded detailed a place for a community opening community opening company opening community opening | Professional Control of Control o | istikasioossa paliparandoonis, u sootaamakkaa ka saada maayaa saada maayaa sootaa maa sootaa maayaa | The state of the s | The same and the s | в при  |
|---|-------------------------------|--|---|--|-------------------------|--
--	--	-----	--	--
--	--	--	--	
--	--	--	---	
--	---	--	--	
--				
v	- Equilde: - Common-Stocks	ARMOR HIDGE INC. COM. SHS	Owdend-Option: Cash	AROWING THE COLUMN TO THE COLU

Common Stocks CHITTENDER CORP  Security identifier. Cot.  CHARCOR HILE  CHARCOR CHARCOR  CHARCOR CHARCOR  CHARCOR HILE  CHARCOR HILE  CHARCOR CHARCOR  CAN  CHARCOR  CAN  CHARCOR  CAN  CHARCOR  CAN  CHARCOR  CHARCOR  CHARCOR  CHARCOR  CAN  CHARCOR  CAN  CHARCOR  CAN  CHARCOR  CAN  CHARCOR  CH					
CHITENDEN CORP  Duvidend Option: Cash Security Identifier: ASC CHARCE HERE TO COM  Dividend Option: Cash Security Identifier: ASC CHITEN FROST PRINKES  Dividend Option: Cash Security Identifier: Cash Dividend Option: Cash Dividend Option: Cash Security Identifier: DSPC Dividend Option: Cash Security Identifier: DSPC Dividend Option: Cash Security Identifier: DSPC Dividend Option: Cash Security Identifier: Cash Dividend Option: Cash Security Identifier: ESP B ENCIE MAILS INC. COM Dividend Option: Cash Security Identifier: ESP B ENCIE MAILS INC. COM Dividend Option: Cash Security Identifier: ESP B ENCIE MAILS INC. COM Dividend Option: Cash Security Identifier: ESP B ENCIE MAILS INC. COM Dividend Option: Cash Security Identifier: ESP B ENCIE MAILS INC. COM Dividend Option: Cash Security Identifier: ESP B ENCIE MAILS INC. COM Dividend Option: Cash Security Identifier: ESP B ENCIE MAILS INC. COM Dividend Option: Cash Security Identifier: ESP B ENCIE MAILS INC. COM Dividend Option: Cash Security Identifier: ESP B ENCIENT INC. COM Dividend Option: Cash Security Identifier: ESP B ENCIENT INC. COM Dividend Option: Cash Security Identifier: ESP B ENCIENT INC. COM Dividend Option: Cash Security Identifier: ESP B ENCIENT INC. COM Dividend Option: Cash Security Identifier: ESP B ENCIENT INC. COM Dividend Option: Cash Dividend Option: Cash Security Identifier: ESP B ENCIENT INC. COM Dividend Option: Cash Divi	Common Stocks	A professional companies with a management of the profession of the companies of the compan	,	The adjustment of	
Security Identifier. Cut.  CUMENT ENERGY. CO COM  Owidend Option: Cash Security Identifier. XEC.  CULLEN-ROST BANKERS Dividend Cipton: Cash Security Identifier. Cash Security Identifier. Cash Dividend Cipton: Cash Security Identifier. Cash Security Identifier. Cash Dividend Cipton: Cash Security Identifier. Cash Dividend Cipton: Cash Dividend Cipton: Cash Dividend Cipton: Cash Security Identifier. DSPC  DIVIDENT COM Dividend Cash Security Identifier. Cash Security Identifier. Cash Dividend Option: Cash Security Identifier. Cash Security Identifier. Cash Dividend Option: Cash Security Identifier. Cash Security Identifier. Cash Security Identifier. Ext. EVINDS CORP. COM  EVERTION SCORP. COM Security Identifier. Ext. EVINDS CORP. COM Security Identifier. Ext. Secur		CHITTENDEN CORP	,	4,109,05	
Security Identifier. CH.  CHARRY ENERGY. CO COM  Dividend Option: Cash Security Identifier. MC.  CHARCOR INC. CHARCOR INC. CHARCOR INC. Security Identifier. CASh Security Identifier. CASh Dividend Option: Cash Security Identifier. CBSN Dividend Option: Cash Security Identifier. CBSN Dividend Option: Cash Dividend Option: Cash Dividend Option: Cash Security Identifier. ESD 8  EKCIE MALLS INC. COM Dividend Option: Cash Dividend Option: Cash Security Identifier. ESD 8  EKCIE MALLS INC. COM Dividend Option: Cash Dividend Option: Cash Security Identifier. ESD 8  EKCIE MALLS INC. COM Dividend Option: Cash Dividend Option: Cash Security Identifier. ESD 8  EKCIE MALLS INC. COM Dividend Option: Cash Security Identifier. ESD 8  EKCIE MALLS INC. COM Dividend Option: Cash Security Identifier. ESD 8  EKCIE MALLS INC. COM Dividend Option: Cash Security Identifier. ESD 8  EKCIE MALLS INC. COM Dividend Option: Cash Security Identifier. ESD 8  EKCIE MALLS INC. COM Dividend Option: Cash Security Identifier. ESD 8  EKCIE MALLS INC. COM Dividend Option: Cash Security Identifier. ESD 8  EKCIE MALLS INC. COM Dividend Option: Cash Security Identifier. ESD 8  EKCIE MALLS INC. COM Dividend Option: Cash Security Identifier. ESD 8  EKCIE MALLS INC. COM Dividend Option: Cash Security Identifier. ESD 8  EKCIE MALLS INC. COM Dividend Option: Cash Security Identifier. ESD 8  EKCIE MALLS INC. COM DIVIDENT CASH  EKCIE MALLS COM DIVIDENT CASH  EKCIE MALLS COM DIVIDENT		Dwidend-Option: Eash			1
CIMAREX ENERCY. CO. COM  Dividend-Option: Cash Security/Identifier. XEC. CLARCOR NIVE Security/Identifier. Cash Security/Identifier. Cash Security/Identifier. Cash Dividend-Option: Cash Security/Identifier. DBRD Dividend-Option: Cash Dividend-Option: Cash Security/Identifier. CBR Dividend-Option: Cash Security/Identifier. CBR Dividend-Option: Cash Security/Identifier. CBR Dividend-Option: Cash Security/Identifier. CBR Dividend-Option: Cash Security/Identifier. EBR Dividend-Option: Cash Security/Identifier. EBR Dividend-Option: Cash Security/Identifier. EBR Dividend-Option: Cash Security/Identifier. ESP Secu		Security Identifier, CHZ	ı		
Dovidend-Option: Cash Security Identifier: XEC CLARCOR BANKERS Dividend-Option: Cash Security Identifier: CSS Dividend Option: Cash Security Identifier: CSSC Security Identifier: CSSC Dividend Option: Cash Dividend Option: Cash Security Identifier: CSSC Dividend Option: Cash Dividend Option: Cash Dividend Option: Cash Dividend Option: Cash Security Identifier: EQS EACHER MATIS INC. COM Dividend Option: Cash Security Identifier: EQS EACHER MATIS INC. COM Dividend Option: Cash Security Identifier: EQS EACHER MATIS INC. COM Dividend Option: Cash Security Identifier: EQS EACHER INC. COM EXECUTED Security Identifier: EQS Dividend Option: Cash Security Identifier: EQS Dividend Option: Cash Security Identifier: EQS Dividend Option: Cash Security Identifier: EQS Security Identifier: ESS Dividend Option: Cash Security Identifier: ESS Dividend Option: Cash Security Identifier: ESS Dividend Coption: Cash Security Identifier: ESS Dividend Coption: Cash Security Identifier: ESS Dividend Cash		CIMAREX ENERGY CO COM	•	C 419 60	
Security identifier. XEC.  CLARCOR LINC.  Dividend Option: Cash. Security identifier. TOSP  Dividend Option: Cash. Security identifier. TOSP  Dividend Option: Cash. Security Identifier: DSP. Dividend Option: Cash. Dividend Option: Cash. Security Identifier: EQP. Dividend Option: Cash. Security Identifier: EQP. Dividend Option: Cash. Security Identifier: EQP. Dividend Option: Cash. Security Identifier: ESD.		Dandand Chatton Cach			
CLARCOR INC.  Security/deening-Cash. Security/deening-Cash. Security/deening-Cash. Security/deening-Cash. Security/deening-Cash. Davideral Option: Cash. Security/deening-Cash. Davideral Option: Cash. Security/deening-Cash. Davideral Option: Cash. Security/deening-Cash. Davideral Option: Cash. Security/deening-Cash. Secu		Serinty Identifier YEC		3 3 1	
Duidend-Opton: Cash Security Identifier. CRS Duidend-Opton: Cash Security Identifier. CRS Dividend Opton: Cash Security Identifier. CPS Dividend Opton: Cash Security Identifier. CPS Dividend Opton: Cash Security Identifier. DSPG Dividend Opton: Cash Security Identifier. DSPG Dividend Opton: Cash Security Identifier. DSP Dividend Opton: Cash Security Identifier. EQL 8 Security Identifier. ESIO:		Oth Brown Balance		, , ,	
Security Identifier: CDA  CULLEN FROSE BANKRS  CULLEN FROSE BANKRS  CULLEN FROSE BANKRS  CULLEN FROSE BANKRS  Dividend Option: Cash  Security Identifier: DSPG:  Dividend Option: Cash  Security Identifier: DSPG:  Dividend Option: Cash  Security Identifier: DSP BANKRS  Dividend Option: Cash  Security Identifier: DSP BANKS  Dividend Option: Cash  Security Identifier: EDP B  EXCIENTATISTING CASH  Dividend Option: Cash  Security Identifier: EDP B  EXCIENTIFIC LINDS INC  CHECTRO SCIENTIFIC LINDS INC  Dividend Option: Cash  Security Identifier: ESP B  EXCIENTIFIC LINDS INC  Dividend Option: Cash  Security Identifier: ESP B  Security Identifier:			and the same of th	4,308.00	
CULLEN FROST BANKERS  Security Identifier: CTR  Dividend Option: Cash Security Identifier: DSPG Security Identifier: EDP Security Identifier: ESP Security Identi		Unidend-Option: Cash	The standard of the standard o	· Bibelingun ma	
CULLEN FROST BANKERS  Dividend Deboor, Cash Security Identifier CSF  Dividend Option, Cash Security Identifier, DSPG Dividend Option, Cash Dividend Option, Cash Dividend Option, Cash Dividend Option, Cash Security Identifier, DY EAGLE MATISTINC COM Dividend Option, Cash Security Identifier, DY EAGLE MATISTINC COM Dividend Option, Cash Security Identifier, DSP EAGLE MATISTINC COM Dividend Option, Cash Security Identifier, ESD EAGLE MATISTINC COM EAGLE MATISTINC COM Dividend Option, Cash Security Identifier, ESD EAGLE MATISTINC COM EAGLE MATISTINC COM Dividend Option, Cash Security Identifier, ESD Dividend Option, Cash Security Identifier, ESD Security Identifier,	***	Security Identifier. CLC	Yorki. s	Application in the contract of	
Dividend Ciptom. Cash Security Identifier: CTR DPP GROUP INC. COM Dividend Option: Cash Security Identifier: DSPC: Dividend Option: Cash Dividend Option: Cash Dividend Option: Cash Security Identifier: DBRW EAGLE MAILS INC. COM Dividend Option: Cash Security Identifier: DSP Dividend Option: Cash Security Identifier: ESP B ENGIE MAILS INC. COM Dividend Option: Cash Security Identifier: ESP B ENGIE MAILS INC. COM Dividend Option: Cash Security Identifier: ESP B ENGIE MAILS INC. COM Dividend Option: Cash Security Identifier: ESP B ENGIE MAILS INC. COM Dividend Option: Cash Security Identifier: ESP B ENGIEVE INC. COM Dividend Option: Cash Security Identifier: ESP B Security Identifier: ESP S S S S S S S S S S S S S S S S S S S		CULLEN-FROST-BANKERS		4.440.50	
Security Identifier: CRB DSP GROUP ING-COM Dividend Option: Cash. Security Identifier: CBSC DNIESS BARN INC Security Identifier: DSR EAGLE MATIS INC COM Dividend Option: Cash Security Identifier: EQB B Security Identifier: ESIO:		Dandand Ontrop Cach	3 6 8 1	The second second	
DSP GROUP INC. COM  Dividend Option: Cash.  Security-Identifier: DSP.  Dividend Option: Cash.  Security-Identifier: DSP.  EAGLE MATIS INC. COM.  Dividend Option: Cash.  Dividend Option: Cash.  Security-Identifier: EQP.  ENGIE MATIS INC. COM.  Dividend Option: Cash.  Security-Identifier: EQP.  ENGIE MATIS INC. COM.  Dividend Option: Cash.  Security-Identifier: EQP.  ENGIE MATIS INC. COM.  Dividend Option: Cash.  Security-Identifier: EQP.  ENGIEVE COM.  Security-Identifier: ESP.  Security-Ide			transmission of	The section of the se	٧
Dividend Option: Cash Security Identifier: Delta Dividend Option: Cash Security Identifier: Cash		Security Identifier: CFR	May product of	The second of th	
Dividend Option: Cash. Security Identifier: DSPG. Dividend Option: Cash. Security Identifier: DBRN- Dividend Option: Cash. Dividend Option: Cash. Security Identifier: DR. EAGLE MATISTING COM. Dividend Option: Cash. Security Identifier: DR. EAGLE MATISTING COM. Dividend Option: Cash. Security Identifier: ED. B. ELETRO SCIENTIFIC LINDS INC. Dividend Option: Cash. Security Identifier: ED. B. ELETRO SCIENTIFIC LINDS INC. Dividend Option: Cash. Security Identifier: ESD.		DSP GROUP INC.COM	*	8-457-80	
Security tentifier DSPG  DRESS BARN INC  DWIGGIG Option, Cash  Security tentifier DSPG  Dovidend Option, Cash  Dividend Option, Cash  Security tentifier, EQP  EACH MAILS INC CIN  Dividend Option, Cash  Security tentifier, EQP  EXCIT MAILS INC CIN  Dividend Option, Cash  Security tentifier, EQP  EXCIT MAILS INC CIN  Security tentifier, EQP  EXCIT MAILS INC  EXCIT MAILS  EXCIT MAILS INC  EXCIT MAILS  EXCIT MAILS INC  EXCIT MAILS		Daylond Option: Cart		No. 11	
Peccurit Vientifier DSPG  Dividend Option: Cash  Security-Identifier DBRN  Dividend Option: Cash  Security-Identifier DBRN  Dividend Option: Cash  Security Identifier EBD BRN  Security Identifier EBD BRN  Security Identifier EBD BRN  Security Identifier EBD BRN  Security Identifier ESD BRN  Security		מינותבות דילותו ריפצוו		Confirmment of the State of	
DRESS BARN INC.  DVICKIATGO DATE.  Security Learning.— DR.  DVCON LINDS INC. COM.  DVCON LINDS INC. COM.  DVCON LINDS INC. COM.  Security Learning.— DV.  EACH TANAIN INC. COM.  Dividend Option. Cash.  Security Learning.— EQ. B.  EACH MAILS INC. C. B.  Dividend Option. Cash.  Security Learning.— EQ. B.  EXCIT MAILS INC. C. B.  Dividend Option. Cash.  Security Learning.— EQ. B.  EXCIT OF COM.  EXCIT OF COM.  C. B.  Dividend Option. Cash.  Security Learning.— EO.  EXCIT OF COM.  EXCIT OF COM.  C. B.  Security Liferning.— EO.  Dividend Option. Cash.  Security Liferning.— EO.  EXCIT OF COM.  EXCIT OF COM		Secunty identifier - DSPC	*	a company a management	
Dividend Option, Cash. Security dentifier. DBRY Dividend Option, Cash. Dividend Option, Cash. Security Identifier. DR. EAGLE MATICS INC. COM. Dividend Option: Cash. Security Identifier. Cash. Security Identifier. Cash. Dividend Option: Cash. Security Identifier. Exp. B. EEGTRO SCIENTIFIC LINBS INC. Dividend Option: Cash. Security Identifier. Exp. B. EEGTRO SCIENTIFIC LINBS INC. Dividend Option: Cash. Security Identifier. Exp. C. Security Identifie		DRESS BARN INC		F 207 J.	
Security Leaving. 1830. Security Leaving. 1830. Security Leaving. 1840.			The second secon	774.000	
Security Identifier: DBRN- DVCONLINDS INCOM  Dividend Option: CBK Security Identifier: DY EAGLE MATICS INC. CBK Security Identifier: DY EAGLE MATICS INC. CBK Security Identifier: DR EAGLE MATICS INC. CBK Security Identifier: CBC Security Identifier: CBC Dividend-Option: CBC Security Identifier: ED  ELECTRO SCIENTIFIC INDS INC Dividend-Option: CBC Security Identifier: ESIO: Security Identifier: ESIO:		Unidend Uplion: Cash		to the control of the	
DYCONLINDS INC.COM  DIVCONLINDS TACCOM  Dividend Option: Cash Security-Identifier: EQ. B. EAGLE MAINS INC. COM Security-Identifier: EQ. B. EAGLE MAINS INC. CL B. Dividend Option: Cash Security-Identifier: EQ. B. EVETTO-SCIENTIFIC INDS INC ELECTRO-SCIENTIFIC INDS INC Dividend Option: Cash Security, Identifier: ESIO. Security, Identifier: ESIO.		Security-Identifier: DRRN	,	a Ministration Control of V	
Onvieta Option: Cash Security Identifier - DY EAGLE MATIS INCCIB Dividend Option: Cash Security Identifier - ED B EAGLE MATIS INCCIB Security Identifier - ED B EVINDS CORP COM Dividend Option: Cash Security Identifier - ED B EVINDS CORP COM Dividend Option: Cash Security Identifier - ED C EVINDS CORP COM Dividend Option: Cash Security Identifier - ES D Security Identifi			**	and a second to the Principles of	
Security Rentifier ESP.				7,077,00	
Security-Identifier DV  EAGLE MAITS INC CON Security-Identifier ESP  EAGLE MAITS INC CON Security-Identifier ESP  EAGLE MAITS INC CL  Dwidend-Option: Cash Security Identifier ESD  EVINDS CONP CON Security Identifier ESD  EVINDS CONP CON Security Identifier ESD  EVINDS CONP CON Security Identifier ESD  EVINDS CONF CON Security Identifier ESD		Dwiderid Option: Cash	And deposits to the second	a a a	
EAGLE MAINT INC. COM. Dividend Option: Cash Security-Identifier: EQP. EAGLE MAINT INC. COM. Dividend Option: Cash Security Identifier: EQD. ELECTRO-SCIENTIFIC INDS INC Dividend Option: Cash Security Identifier: ESIO:		Corners Jacking DV	April of Francis (1977) In a special parameter	a supplied of the supplied of	
Edicit Mails INC COM Divided Option: Cash Security Identifier: EQB EACHE MAILS INC CL B Dividend Option: Cash Security Identifier: EQB EVINDS CORP COM Dividend Option: Cash Dividend Option: Cash Security Identifier: EED  ELECTRO SCIENTIFIC LINDS INC Dividend Option: Cash Security Identifier: ESD Security Identifier: ESD Security Identifier: ESD:		Scaling Inclinia.	A THE WINDS AND SERVICE AND SE	control of the second of the s	,
Security-Identifier, ESP.  Security-Identifier, ESP.  ENGLE MALLS INC. CLR  Dividend-Option: Gash  Security-Identifier, ESP.		EAGLE MATIS INC COM	The first of the description of the first of	A 247 95	
Sesuity-Identifier-EQ.  EAGLE MAILS INC.CL.  Dividend-Option: Cash Security.Identifier. ED.  EVINDS CORP. COM Dividend-Option: Cash Security.Identifier. EFO Dividend-Option: Cash Security.Identifier. ESO Security.Identifier. ESO Security.Identifier. ESO Security.Identifier. ESO		Divident-Cach	and the state of the second of	11.000	
FACIL MALLS THE CLE  Dividend Option: Cash  Security Identifier: ED. 8  Security Identifier: ES. 9  Security Identifier: ES. 9			Complete to a	****	
EAGLE MATIS INC. CL. B.  Dundend-Option: Cash Security Identifier: EFD  RECTRO SCHWITFIC LONG  RECTRO SCHWITFIC LINDS INC  Dwidend-Option: Cash Security Identifier: EFD  Security Identifier: ESD  Security Identifier: ESD	ξ	Security to British to Kristing Comments of the Comments of th	a dealer of	And the property of	
Dividend Option: Gash Security Lidentifier: TSD B. EVINDS CORP. COM. Dividend Option: Gash Security Lidentifier: TED  EVERTRO SCIENTIFIC INDS INC Dividend Option: Gash Security Lidentifier: ESD Security Lidentifier: ESD		EAGLE MATISTICCI R	de de la constante de la const	A 239 AM	
Security Identifier. EST 8  EUNDS CORP. COM. Dividend Option. Gash Security Identifier. EFD  EVERT SCIENTIFIC INDS INC Dividend Option. Gash Sécurity, Identifier. ESTO.		Designated Contract Cont	****	T.VARBARU.	
Security Lidentifier: EVP. B. EVUNDS CORP. COM. Dividend Option: Gash. EVECTRO SCIENTIFIC LINDS INC Dividend Option: Cash. Security Lidentifier: ESIO:		CIVILICATION OF THE PROPERTY O		A part of the second se	,
EFUNDS CORP COM  Security Liferative: TET  Dividend Option: Gash  Security Liferative: ESIO  Security Liferative: ESIO		Security Identifier: EXP.8		m the second of the second of	
Dwidend-Option: Gash Security Identifies: FED Dwidend-Option: Cash Security Identifies: ESIO:		EFINDS CORP COM-		CO. 100. Y	
Security Identifier. ESIO: Security Identifier. ESIO:	adju			4.023.6U	
Security Dentifier: EFD  EFCTRO SCIENTIFIC INDS INC  Dwidend-Option: Gash  Sécurity Dentifier: ESIO:	,	Dance College Cash		Company of the Compan	
ELECTRO-SCIENTIFIC INDS INC Durdend-Option: Cash Security.Identifier, ESIO:	•	Security Identifier. EFD	: !	Annual Market and Annual Market and Annual A	
Dwidend Option: Gash Security Identifier. ESIO:		FLECTRO-SCIENTIFIC INDS INC		Control of the Contro	
Security Identifier, ESIO:		The state of the s	1	The state of the s	•
Security. Literature: ESIO.	T page .	Dividend Copies. Casp	* * *	Control and device to properly to debit admits a con-	,
A CAMPANIAN CANADA CANA		Security Identifier: ESIO"	- 10 m	activities and the object of the object of the	
Tolerando Companyo Co		The state of the s	display prima	a . Physican parameter and other	
The second secon		the state of the s	3	Constitution and process	
			2 1		
The second secon	1 11 11/12	The state of the s			

And a

THE PARTY OF THE P		enal kirila Arama dan kamanda min kamanda ni kirila da na kamanda manda da d	
Commence Statement Commence Co	to the terrological control of	A VIETNAMEN AND THE	and the second particular and the second sec
TO SOLD THE MAN AND AND AND AND AND AND AND AND AND A	Africa de de Compos madernos - en 199 Africa	6710 60	THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER.
FLUNINA EAST COAST INC. COM	Brighted makes the same of	The state of the s	tal promoter or one or owner
Dividend Option Cach	Residual di Combinata dell' Sensi dell'	THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TO PERSON NAMED IN	STATES TO THE STATE OF THE STAT
	The section	to an infrared formatter than the second of	
Securification + LA		parentes. The same and the American Company of the	
VJ B JI B J H L B J H		TOTAL	1
COLLEGE BLANCE		AND	:
- Owidend-Option: Cash	4	a year or a a compression of a compression of the c	
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		The second secon	
Second resumer.	į	to a company on Architecture of the Company of the	
HIDSON HTD RANCORP COM		797778	
		And the second section of the section o	
Unidend-batten Cash		a manufacture of the court care day	,
Consiste Character To		a a section a contract to	
Section designed in the		A TANA TANA A MANAGEMENT LANGE	
SCON PHR LTD CO COUNCASTO AND			
THE CONTROL OF THE CONTROL AND		no'ney'o	,
Dividend Option: Cash	:	A ANDRESON C. C. STATE A	
The state of the s			
Security Identifier. ICLR			
INFINITY DOTAL CAS CODE COM			
		0731640	
Dividend Option: Cash.			
200 Tr. 100 - 20		a card and controlled out of	
Secund Jaenmer. IPCC		a republic property and the control of the control	
INITED TEL INIC		- Lord of Part of the Assessment Control	
		-00'09-5	
Theorem Cont.		to a systematical property of the con-	
רואוידרותי אלאותור דישאו	1		
Security Adentifier - INT	Committee of the Commit	the state of the party of the state of the s	
The state of the s			
JOURNAL COMMUNICATIONS INC		7,003,00	
		The same of the sa	
Dwidend-Dation-Cash	,		
The state of the s			
Security identities. JRN		Code :	
1 A OHINTA-PODD-DAID-COM			
A CONTRACT I COM		6,474.05	
I A DUNTA BRITS & 1 COM A DUNTA CODE	;	The state of the s	
STOP CHIEF COMMON TO STORY OF THE STORY OF T		a di mandidi pandan da	
Dividend Obtion: Cash		a manufactural and an analysis of the second	
		and the state of t	,
Security Identifier - LOI		* PARTY PARTY AND A PARTY AND	
	,	The second secon	
LANCE	100000	6.460.20	
Divident Ordion Such	0.000		
Children Childle Cast		A D. A. ST. A. S	
County Identifier INCE		a a supplement	
Take Taken Manual Commen	ţ	The State Community of the Community of	
LEARNING TREE INTERNATIONAL INC	*****	The same of the sa	
The state of the s	a principa tipe	THE PARTY OF THE P	
13IN#035Z20151063	Affair and the Control of the second second	construction of the second of	
Daidend Ortion Cost	- de Consequence and - de	and a second sec	77 200
Cleaning Opinion, Casil	•	the PR Admin of Street agree Way Start Spinor was	
Security Mentifier 178F		more open polyment property processing the	
	,	e modeling or consuminations	
		NATION OF THE PROPERTY OF THE PARTY OF THE P	
CINIDERIA COMON. CASO.	i	and the state of t	
Constitution	-		
County rectional Chica			
MGE ENERGY INC COM		A.192.65	
Carlotte Control of the Control of t		Colocalia	
Owigeria Applon. Cash			
Security Identifier ANCES			,
Second Johnson More			,
		and a second	-
	,	The second secon	:
		a street of Affective grammer of safe and	,
	,	the party of the second	

The second secon

	to the first to the second of the first second to the first second	I form to the second state of the second state of the second seco	The property of the common and property the state of the control o
n-Stocks	the same of the same of the same of		depression of the production of the statement of the stat
	MICRE! INC COM	a positional in the contract of	TEST IN
	Dungland Ondiana Sail	Company of the contract of the	The state of the s
	Cividenta Option. Casn	The state of the s	the state of the s
	Secump-Identifier MCRL	MATCHING IN IN IN A MATCHING	to the to be additionally and a second to the second terms of the
	MILLED CIEDRARN INC	Magazina a statement to a me	The state of the s
	INTERTO THE MAN THE	and complete in the difference of	
	Unidend Option: Cash	destination that proceeds as a figure of a	the second of th
	Security Identifier., M. HR.	the state of the state of the state of	The manufacture of the control of th
	No. De Contractor		A CATANT PROTESTING CONTRACTOR OF THE STATE
ì	NCI BELIC STSTEM INC		226.0
	Dividend Option: Cash-	STEEL STATE OF THE	
	Comme Topolifice NICC	Seaper a	The first the second state of the second state of the second state of the second secon
	secunity denumer, iv.	The contract and place of the contract of the	A distribution of material management of the contract of the c
	OPTION CARE INC COM	profitation a state of the state of	2.952.80 months of the contract of the contrac
	Dividend Option: Cach	F AFF 1 4 4 4 4 4 4 5 4 4 5 4 4 5 4 4 5 4 4 5 4 5 4 5 4 5 4 5 4 5 5 5 6 5 6	Carlos conditional file and reference and the second secon
	The state of the s		Appropriate processing and the state of the superficial between the control of concession and the control of the control of the state o
	Security Identifier, UPIN	the principle principle of the principle	
	OXFORD INDS INC COM	and all colors and col	The state of the s
1	Control Control	as despesas in Appropriate propositions and a second secon	TO DE TO THE TEXT OF THE PROPERTY OF THE PROPE
	טואסייוים כישטואים	City department of the company of th	<ul> <li>Francisco de la coloció de la principal de la contraction del contraction de la contraction de la contraction de la contracti</li></ul>
	Secunividentifier OXM	White programmes are the common common programmes and the common	Activate of the destrict of the original original and the second order of the property of the
	DAYABCOOD	· ·	Control according to the second deposits to the participation of the second deposits of the second deposits by a
	TACAR COR		and the second s
	Unidend Option: Cash		and well after a distributed by the first interpretation of the production and the contract of
	Secretive Infantifier - PYR	* * * * * * * * * * * * * * * * * * * *	
	David Coc Cito Cocimor in	The same of the sa	the second product and a second secon
	PATIESS SHUESCURCE INC COMMON STOCK	C COMMON STOCK	000009
. ,	Dividend Option, Cash		
	Security Identifier DSS	•	\$
	O'ANTERNIET LIFE	the state of the s	
	PLANTAURIES INC NEW	•	5.545.80
	Dividend Option: Cash	,	in a mark Andrews and production of the second of the seco
	Coumbi Identifier DLT	loughts.	the support of the state of the support
			the second secon
	PROVIDENT FINE SVCS IN		X784.00
2	Dividend Option: Cash	4000	The state of the s
	Committee I don't fam. DEC		A controlled type price on major Windowsky and deliver any or
1	Security definites. Pro	P(1)(1)	A TO STORM THE TOW
	RYANS RESTAURANT GROUP INC COM	CPINCCOM	37.202.75
	Dividend Ontion Cash	The statement of the st	a many of the property of the
	Control Option Control	and the second of the second o	The state of the s
1	Security identifier. KYAN	ellum (the self) eleminous qualitature	A Charles of the Control of the Cont
	SAFENET INC COM	Control for control of the register of the control	The state of the s
	Dandand Onton Cash	a state describes the control of the	A. SCHOOL OF A SCHOOL SCHOOL AND A SCHOOL AN
	כואות החומר כסאר	And the state of t	<ul> <li>option of an interest of the property of the control of the control</li></ul>
	Security Identifier, SFNT	to a consistent	· A strategy of the Contract of the strategy o
		Company of the compan	ACTION OF THE STATE OF THE STAT
	ì	The second secon	a so supposed to the second se
		produced and the contract of t	the supplied on the section (Schoolster)
		(New Yorks and American Spiritum Control Contr	the second substantial and confidence of the second experimentation.

Equities  Common Stocks  SIMEON MANUEXCTURING CO  Divident Opton Cash	
Secury Identifier SSD  SUPERIOR ENERGY SERVICES INC. Divident Option Cash Secury Identifier Std. SYBRON DENTAL SPECIAL TIES INC COM	
Divident Option: Cash  Scaring Identificar, SVD  TRANMIELL CONOR  Dividend Option. Cash  Scaring Identificar, TCC  461 Coption  Dividend Option. Cash  Scaring Identificar, TCC  Widend Option. Cash  Scaring Identificar, TCC  Widend Option. Cash  Scaring Identificar, TCC  WINT COM  WINT	7.793.20
Overland Opton-Cash Security Abadifier. UCO WABTECTON Dividend Opton-Cash Security/Gentine: WAS Security/Gentine: WAS WADDELL at REED FINE INC.C.A	5.185.20
Dividend Option—Gash  Scienty Identifier: NOR WARNAGO GROUP-INE COM NEW Dividend Option: Cash Scienty Identifier: WROC WASTAMERICA: WROP WESTAMERICA: WROP WESTAMERICA: WROP WESTAMERICA: WROP Scounty Identifier: WROE Scounty Identifier: WROE WORLD WRISTILING ENTINT INC.CL.A Dividend Option: Cash Scounty-Identifier: WWNE	2,182.00 2,185.00

Transaction and the state of th
ANY CONTRACTOR OF THE PROPERTY
A COMPANIE OF THE COMPANIE OF
Separation and the experimental of the experimental and the experimental
The second secon
TO EXPLORED TO THE PROPERTY OF
TARE AND
Additional to the company of the contract of t
Construction of the Constr
e time temperature de la companya de
The state of the s
Life y 12 mily representation for the property of the contract of the property
bean consideration of the desired of the constitution of the const
The second secon
And in some the second of the
A CHARLES AND A
PROPERTY CONTRACTOR TO THE
Treatment and a contract of the contract of th

Resident Control of the Control of t	An Australia Comment of Commentation Commentation and other production and other production of the Commentation of the Comment	province connections we play deliberational	
The second secon		The state of the s	
transferring females	Contraction to the state of the production of the careful of the production of the productin of the production of the production of the production of the pr	Strong - Walfer James 10	
Common Control	or Consisted and approximately provided and one of the confedence are increased and a Confedence and Confedence	excessionate trains on special and an experi	
	CATALON AND THE PARTY OF THE PARTY AND THE P		
DAIMLERCHRYSLER AG NAMEN AKT	17.825.61	sander) a see as a page	
ISIN#DEOXITOGOO	the first the same professional and the same security of the same securi	Andrew 1	
	The state of the s		
Unidend Upition: Cash			
and the second of the second o	and a company to a company of the second state of the second seco	a san an and a san and a san and a san	
The second secon	Commission of Englanding and Annie A	a to at the state and control of the state o	
ABN-AMKO-HLDG-N-V-SPON-ADK	3,320,00	the of manufacture of the same	
Dividend Charles Take	To the second se	a superior section of a section of the section of t	
to the second state of the	anticidade de después de después de la marcha de la marcha de la companya de la c	and advantage of a second first of	
Security 10en (IIIer ABI)	Control of the following the standard of the s	and Amygrampromediate characteristics of the Company of the Compan	
APTONIN U SON ARICO BEZ	of control descriptions of the fact of the	And the first term and the contract of the con	
The state of the s	the second secon	AND THE RESIDENCE OF THE PROPERTY OF THE PROPE	
Dividend Option: Cash	of control for the control of the desired desired to prove the household desired to the second to the property of	a statement a management of the statement of the statemen	
	Constituted in a second of the second	make the distance of changes	
יייי ייייי יייייי אייייייייייייייייייי	gen ja sen an en	and comment or comment days	
AKZO NV SPON ADR	we are the second secon	conservation and distance on	
	Survivoremental programment and the same of the same o	and absorberate on the second	
ŧ.	THE PARTY OF THE PROPERTY OF THE PARTY OF TH	the second of the second of	
Security Manifest AV 70X	The second secon		
CCORST TOWNS TOWN TO THE CONTRACT OF THE PROPERTY OF THE PROPE	is the second process of the second process		
ALCATEL ALSTHOM SPONSORED ADR	a service of the serv	completely a c c c or one designation of	
The state of the s	The last transfer of the last	******	
The state of the s	SECTION OF THE PROPERTY OF THE	TO AND IN THE STATE OF THE PROPERTY OF THE STATE OF THE S	
reconstruction to the training of the second	a digas and managed and the same of the content of the same of the	Score an anymost continue and constant and c	:
Property of the Control of the Contr			39
Contraction of the Contraction o	The Control of the second of t	9	9
The state of the s			
AND THE PROPERTY OF THE PROPER	X 618 ZK	The state of the s	
The state of the s			
ININELLACIA AND A COMPANY OF THE PROPERTY OF T			
Philippie Cach	A PARTICULAR CONTRACTOR OF THE PROPERTY OF THE	No. 1), sentente constituire de cantagrado de la casa de la casa de la calcada de la casa de la casa de la casa	
		TO SELECT ANY COLUMN TO THE COLUMN TO SELECT ANY COLUMN TO THE COLUMN TO	
Security (dentifier BAESY	CO. THE PROPERTY AND ADMINISTRATION OF THE PROPERTY ADMINISTRATION OF THE PROPERTY AND ADMINISTRATION OF THE PROPERTY ADMINISTRATION OF THE PROPERTY ADMINISTRATION OF THE PROPERTY ADMINISTRAT	independent of a substitute of the company of the c	
The state of the s	THE PROPERTY AND THE PROPERTY OF THE PROPERTY	descriptions of the rest and advertise and continues and c	
PLACE AND	2.18 Lineary and the second se	designation of some on Artificial Springer (Members of Springer)	
- Pividone Ontion Cach	TO THE PARTY OF TH	Andrew and the production of t	
CALL TO THE PARTY OF THE PARTY	A TAMEN OF STREET WINDS AND STREET ST	and a second and a second seco	
Security identifier. B1	TO THE PROPERTY OF THE PROPERT	the second statement of the second se	
The second secon			
TO HIND TO THE PARTY OF THE PAR	2,8776	And the state of t	
ISIN#US05946K1016-APONSORED-ADR	the section of the section is the section of the se	Management of the street of the day of the contract of the street of the	
The state of the s	and speed on condension of the North Control of the State	according to the one constraint on the section of t	
A CONTRACTOR OF THE PROPERTY O	the opposition to the contract of the provided for the provided for the contract of the contra	POLICE AND CONTROL OF THE PROPERTY OF THE PROP	
Security Identifier 18V	COLL MA COMMON PLANTAGE WITH THE PROPERTY AND ADDRESS OF THE PROPERTY AND ADDRESS OF THE PARTY AND ADDRESS OF THE PARTY AD	大学 W. かくか、 たいりと かたいかかから はながらないできないないのできないない。	
BANCO SANTANDER CENT HISDANO & A AND	TO A THE CONTRACT OF THE CONTRACT WAS ARRESTED AND A STATE OF THE CONTRACT OF	The offering displacements and a second second property of the second property of the second	
production in the contract of	And the state of t	the separation of the semantic by the separation of the separation	
ISIN#0X05964F1059	to see and the contract of the	and the County of the County o	
	AND THE PROPERTY OF THE PROPER	And the state of t	
TOP I TOP I TO THE	to adole the control of the control	to design a second for all the design of the second second and the second secon	
Security Identitier: SID.	The second second and the second seco	construction of the contract o	
The state of the s			
The state of the s			
and the second section of the second	AND THE PROPERTY OF THE PROPER	to be designed to the state of	
designed and the second	to the management of the state	minimum or a management of the second of the	
the state of the second st			

		The same of the sa
		A LANGUAGE OF A STATE OF THE PROPERTY OF THE P
0		
AND AND THE PROPERTY AND ADDRESS OF THE PROPERTY ADDRESS OF THE PROPERTY AND ADDRESS OF THE PROPERTY ADDRESS OF THE PROPERTY AND ADDRESS OF THE PROPERTY ADDRE	AND AND ADDRESS OF THE PARTY OF	The state of the s
THE PROPERTY OF THE PROPERTY O	The second section of the second seco	The state of the s
Participation of the State of t	AN ADMINISTRATION OF THE PROPERTY OF THE PROPE	and the state of t
opening management and an appropriate the second se	AND THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON OF TH	Consequence of the contraction o
	THE PARTY OF THE P	the property of the control of the c
		The state of the s
	The state of the s	The state of the s
references assumed a primary against a proportional problems from Francisco proportion and proportional proportions and proportional proportional proportional proportions and proportional proportions and proportional proportions and proportional proportions and proportional proportional proportions and proportional proportional proportions and proportional propor		
Ampliante production for the control of the control		
The state of the s		The same of the sa
		The second secon
		and designation for the contract of the contra
		and product the adversary and the second
		And the second contract of the second contrac
C. C	* 64F AB	
	The state of the s	The second state of the second
	Charles and the second	the grant property of the administration of the state of the property of the state
Control of the Contro	The state of the s	A COMPANY OF THE PARTY AND A STREET OF THE PARTY OF THE P
Diedend Option: Cach		A STATE OF THE PARTY OF THE PAR
Control of the contro		Contraction of the last of the
Security Identifier (*AFY		
Commencement of the Commen	Company of the second	CONTRACTOR OF THE PARTY AND THE PARTY OF THE
COMMETERANK AG ADD NEW COOKCOSER AND		the transferred contract of the contract of th
The second secon	The state of the s	And the same and t
Dividend Onton: Fach		The second secon
SCHING TO THE PARTY OF THE PART	The state of the s	The same of the sa
The state of the s	The same of the sa	Particular and the contract of
COMPANIA ANGNIMA NACIONAL TELEFONIC		Commence of the Commence of th
Consequence of the Control of the Co	A PARTY PARTY TO THE PARTY TO T	Copper processor and the contract of the contr
DE VENEZUELA SPONSORED ADR REPORTS		
Commission of the Commission o	The same of the sa	
I promote the second of the se	AND THE REAL PROPERTY AND PARTY OF THE PARTY	AND THE PERSON AND TH
to the second control of the first of the second control of the se	Commence of the company of the party of the	the first of the state of the s
DAKOBRO DOROP LASE	and the state of t	and the second contract of the second of the
Security of the second	A STATE OF THE PARTY AND THE P	and the second s
Commenced to the commenced of the commen	Control of the Contro	and management and General and weight in the second contraction of the form of the first part of the first of
	Conserved of ASS. ASS.	Accompanies and a grant of the contract of the
The state of the s	a constant	The state of the s
Dawdend Ontion: Cach		
Address of the Control of the Contro	The state of the s	THE RESIDENCE AND A SECOND SEC
The same of the sa	CONTRACTOR AND	CONTRACTOR AND THE PARTY OF TAXABLE PARTY OF TAXABLE PARTY.
The state of the s	Chicago and a second and discussion of the second and a second a second and a second a second and a second a second and a second and a second and a	The second secon
CONTAX BADTICIBACOES C A COOM AND	44.44	
The state of the s	Control Control of the Control of th	THE RESIDENCE AND THE RESIDENCE AND THE PARTY OF THE PART
The state of the s	Andreas and a second to be a second of the s	AND THE RESIDENCE AND THE PARTY OF THE PARTY
The state of the s	and the second s	the second secon
Committee Committee Committee		
Security individes. CANA		
COSIC COOLING TO A STATE OF THE PROPERTY OF TH	A STATE OF THE PARTY OF THE PAR	Manual days have been all the foreign entering a following and property as an action of a contract of the following the foreign and a contract of the following the follow
CONTRACTOR STATE OF THE STATE O		ACTION AND ADMINISTRATION OF PERSONS AND ADMINISTRATION ADMINISTRATION ADMINISTRATION ADMINISTRATION ADMINISTRATION ADMINISTRA
The state of the s	Contract of the Contract of th	Average and confidently and a second control of the second control
TICO TICOLOGICA		The state of the s
Specific CCA		
DAS GROUP HINGS I IN SPONS AND	2 256 40	COLUMN THE PROPERTY AND ADDRESS OF THE PROPERTY ADDRES
The state of the s	A section of the sect	The president region where the contract of the president and the p
DWIGHT OPTION CASH	The second secon	participament mention to principal measurement in ordinal participal and confined in the confined in the confined or probability
The supposed desired in the supposed desired and the supposed desired a	a direct and make a full distances and distances appropriate property community commun	about the contract of the cont
		THE PARTY OF SECURITY OF SECURITY SECUR
The second secon	And the second s	THE PROPERTY OF THE PROPERTY O
MENTACHE LELENAM AN OPTINGHED AUR	15,139,20	Commission of the contract of
- Bridge de Captions Cast		
Sarinty Hanther DT	And the state of t	Amende (Amende de Carles d
Application and the course of	margital digition () information property of consideration of consequent of the consequent of the consequence of the consequenc	Charles and an analysis of the Control of the Contr
ESALCOLO BOOK INCOMINGO TABLE	Control of the Contro	COMPANY OF SHAPE SHIP SHIP SHIP SHIP SHIP SHAPE SHAPE SHAPE SHIP SHIP SHIP SHIP SHIP SHAPE SHIP SHAPE SHAPE SHAPE SHAPE SHIP SHAPE S
AND STATE OF THE PROPERTY OF T	DESCRIPTION OF THE PROPERTY OF	at the first content of a continuous and the second of the
CALL TO THE PARTY OF THE PARTY		
The second secon		
UNIGERIO UDITOR ( 250		
Consider the state of the state	The same of the sa	The second commence of the control o
Security racingles. LOALT	district the same of the same	the state of the same of the s
CIPCL DAZILIZATION AND	The state of the s	And the second contract of the second
The state of the s	07 087 7	the ground section as a common and the security of the section of the contract of the section of
The second secon	reporter una commence manage modern mental an majorant managed commenced.	the second control of
the state of the s	A COLUMN TO A COLU	property of the property of th
Security Identified: 1141	to produce a service de la contrata del la contrata de la contrata del la contrata de la contrata del la contrata de la contrata de la contrata del la contrata de la contrata del la	An extensional contract to the
The state of the s	The same of the sa	Annual and American Company of the C
FRAME LILECUM SKUNDURLI AUK	The state of the s	The state of the s
more recorded to the control of the state of		the second secon
CHARLES COUNTY CONT		
Security dentified. STE		
disconnection of the second se	The state of the s	The second secon
MAN SON THE PROPERTY OF THE PR		Management of the contract of
The state of the s	The second secon	entire de la company de la com
Dividend-Option-Cash	and the section of th	manufactured and extractional and extractional and construction of the contract of the contrac
The second secon		
Carintal Manual Contract of the Contract of th	AND THE PARTY OF T	and an individual formation to a substitution of the substitution
The state of the s	Commence and passed grapher passed species and and a market and a market	THE PARTY OF THE P
Minimal and the second	and the remainstranger processing the processing of the second of the commentation of the second of	THE RESIDENCE OF THE PROPERTY
* District Control of the Control of	Control and Transfer Control and Control a	Charles between the second contract of the se
	The state of the s	
THE PROPERTY OF THE PROPERTY O	and the state of t	
		The second secon

12,106.05 9,386.30

The state of the s

4,224.00

Common Stocks  CLAXOSMITEIX INE PLC SPONS ADR  Dividend Option: Cash Secure Jedentifier - GSK HEINEKEN NY ADR  Dividend Option: Cash Secure Jedentifier - HINY HITACHILIDADE (O COM NEW Dividend Option: Cash Secure Jedentifier - HINY HITACHILIDADE (O COM NEW Dividend Option: Cash Secure Jedentifier - HINS New System Cash Secure Jedentifier - HINS New System Cash Secure Jedentifier - HINS IN SECURE PRE- FAR  NOVIGEND FREE PURE  IN SECURE FREE PURE  Dividend Option: Cash Secure Jedentifier - HISAN  N T CORE SPON ADR  Dividend Option: Cash Secure Jedentifier - HISAN  N T CORE SEON ADR  Dividend Option: Cash Secure Jedentifier - HISAN  K CONINKLINE AHOLEN WYSP  Secure Jedentifier - HISAN  K CONINKLINE AHOLEN WYSP  Secure Jedentifier - HISAN  K CONINKLINE AHOLEN WYSP  Secure Jedentifier - HISAN  K CORE TELE PURE  Secure Jedentifier - HISAN  Secure Jedentifier - HISAN  Secure Jedentifier - HISAN  K CORE TELE PURE  Secure Jedentifier - HISAN  K CORE TELE PURE  Secure Jedentifier - HISAN  Secure Jedentifier - HISAN  Secure Jedentifier - HISAN  Secure Jedentifier - HISAN  K CORE TELE PURE  Secure Jedentifier - HISAN	Ednines	Alternative with the property of a company of the c
	mmon-Stocks	to the folders as the second of the folders of the second
	traction of a control parameter of the same and a second	CLAYOCHITHE DIC CDONG AND
		Unideria Uguan Cast
	•	Security identifier GSK
		HENEKEN NY ADR.
		Dividend Option: Cash
		Sparith Identifiar HINKY
	100 to 100	HTATHITTH AND TATOR WITH
Security Cleaning—Cash  Nindend Opion: Cash  Security Cleaning—Cash  KT CORE SEON SORED ADR.NEW  Dividend Opion: Cash  Security Cleaning—AiO.  Control Cheaning—AiO.  Security Cleaning—AiO.  Security Cleaning—Cash  AiD.  Security Cleaning—Cash  Security Cleaning—Cash  Security Cleaning—Cash  NAREY  Security Cleaning—Cash  Security Cleaning—Cash  NAREY  Security Cleaning—Cash	- Shage	CHARLES OF THE CASE OF THE CONTRACT OF THE CASE OF THE
Security Identities. HIT.  IMPERIAL CHEM INDS PLC ADR NEW Dividend Opion: Gash Scionity Identifier. ICI  INVENTS PRE-SPONSORED ADR Dividend Opion: Cash Security Identifier. INNST I SAINSBURK PLC.SPONSORED ADR.NEW Dividend Opion: Cash Security Identifier. INNST I SAINSBURK PLC.SPONSORED ADR.NEW Of CORE SPONSORED ADR.NEW CONNINKLINE ABOLD. TO SAIN Security Identifier. SAIN KT CORE SPONSORED ADR.NEW Dividend Opion: Cash Security Identifier. ASI	raphris	
UNPERIAL CHEM INDS PLC ADR NEW  Dividend Option: Gash  Scainty Tatainter, INT  Scainty Identifier, INSY  I SAINSBURY PLC SPONSORED ADR  Dividend Option: Cash  Security Identifier, INSY  I SAINSBURY PLC SPONSORED ADR NEW  Olividend Option: Cash  KT CORE SPON ADR  Owdered Option: Cash  KT CORE SPON ADR  Owdered Option: Cash  Scainty-Identifier, ATC  KONINKLINE AHORD INY SPON ADR NEW  Dividend Option: Cash  Scainty-Identifier, ATC  NORTHE LIEC PURP  Scainty-Identifier, ATC  Scainty-Identifier, ATC  NORTHE LIEC PURP  NARKS & SPENCER CROUP PLC. SPONSORED  ADR  School Cash  Scainty-Identifier, ATC  Scainty-Identifier, A		Seamy identifier, HIT
Doudend-Option: Cash  Security/Identifier. ICI  ING GROED NAY. ADR  Dividend Option: Cash Security Identifier. INSTY  I SAINSURYS PLEC SPONSORED ADR.NEW  Dividend Option: Cash Security Identifier. INNSTY  I SAINSURYS PLEC SPONSORED ADR.NEW  Dividend Option: Cash Security-Identifier. ASRIP  KT CORP SPON ADR  Dividend Option: Cash Security-Identifier. ASRIP  Security-Identifier. ASRIP  Security-Identifier. ASRIP  Security-Identifier. ASRIP  Security-Identifier. ASRIP  Security Identifier. ASRIP  Securit		IMPERIAL CHEM-INDS-PLC-ADR NEW
Netary Izlantine: ICI ING GROP NAY. ADR Dividend Optom. Cash  NINENSYS PLE-SPONSORED ADR Dividend Optom. Cash Dividend Optom. Cash Security Identifier: INSY I SAIN'SBURY PL C SPONSORED ADR NEW Olividend Optom. Cash Security Identifier: ANSY  Security Identifier: ANSY  Dividend Optom. Cash Security Identifier: ANS  NOREA ELEC PUNK TO SPONSORED ADR. RPS) G  Security Identifier: ANS  Security Identifier: ANS  Security Identifier: ANS  MARKALES SPENCIE CROUP PLCS FONSORED  ADR  ADR  ADR  Security Identifier: MER  NAMRES A SPENCIE CROUP PLCS FONSORED  ADR  Security Identifier: MER  NAMRES A SPENCIE CROUP PLCS FONSORED  ADR  Security Identifier: MER  NAMRES A SPENCIE CROUP PLCS FONSORED  ADR  Security Identifier: MER  NAMRES A SPENCIE CROUP PLCS FONSORED  ADR  SECURITY IDENTIFIER  NAMRES A SPENCIE CROUP PLCS FONSORED  ADR  SECURITY IDENTIFIER  AND SECURITY IDENTIFI		Dwidend-Option: Cash
ING-GROEP N.N. ADR  Dividend Optoon: Cash  Securly Identifier: INICS  INCLUSIVE PLC-SPONSORED ADR. NEW  Dividend Ciption: Cash  Securly Identifier: ACR  I SAINSBURY P.R.C. SPONSORED ADR. NEW  Dividend Ciption: Cash  Securly Identifier: ACR  Dovidend Option: Cash  Securly Identifier: ACR  CONTINKLINE AHORE IN SPON ADR. NEW  Dividend Option: Cash  Securly Identifier: ACR  CONTINKLINE AHORE IN SPONSORED ADR. RESTG.  Singly Usefulfier: ACR  Continguation: ACR  Singly Usefulfier: ACR  MARKS. A. SPENCIR CROUIP PLC. SPONSORED  ADR.  Publish Chemical Cash  NARKS. A. SPENCIR CROUIP PLC. SPONSORED  ADR.  Schildend Option: Cash  NARKS. A. SPENCIR CROUIP PLC. SPONSORED  NARKS. A. SPENCIR CROUIP PLC. SPONSORED  ADR.  Schildend Option: Cash  NARKS. A. SPENCIR CROUIP PLC. SPONSORED  ADR.  Schildend Option: Cash  NARKS. A. SPENCIR CROUIP PLC. SPONSORED  ADR.  Schildend Option: Cash  NARKS. A. SPENCIR CROUIP PLC. SPONSORED  ADR.  Schildend Option: Cash  NARKS. A. SPENCIR CROUIP PLC. SPONSORED  ADR.  Schildend Option: Cash  NARKS. A. SPENCIR CROUIP PLC. SPONSORED  ADR.  Schildend Option: Cash  NARKS. A. SPENCIR CROUIP PLC. SPONSORED  ADR.  Schildend Option: Cash  Schildend Option: Cash  NARKS. A. SPENCIR CROUIP PLC. SPONSORED  ADR.  Schildend Option: Cash  Schildend Option: C		CACITIVITABILITIES (PENETRALIA)
Dividend Optom; Cash  Security Identifier: INC  INVENTYS RE-SPONSORED ADR  Dividend Optom; Cash  Security Identifier: INSY  I SAINSBURK PLC.SPONSORED ADR.NEW  Dividend Optom; Cash  Security Identifier: ISAN*  KT CORE SPON ADR  Dividend Optom; Cash  Security-Identifier: ABAN*  KONNINKLINE ABADILI NY SPON ADR. NEW  Dividend Optom; Cash  Security Identifier: ABAN*  KONNINKLINE ABADILI NY SPON ADR. NEW  Dividend Optom; Cash  Security Identifier: ABAN*  KONNINKLINE ABADILI NY SPON ADR. NEW  Dividend Optom; Cash  Security Identifier: ABANCR  ROMARCA, SPENCER CROUP PLC.SPONSORED  ADR.  Security Identifier: ABANCR  Security I		ING. GDOED ALM. DD.
Divident Opton: Cash  Securit Identifier INCS  NUCLYSTS FLEE PONSORED ADR  NUCLECTORION: Cash  Securit Identifier INNS  I SAINSBURY P. I. CS FONSORED ADR. NEW  Olivident Opton: Cash  KT CORE SPON, ADR  Divident Opton: Cash  Security-Identifier. ATC  Security-Identifier. ATC  Security-Identifier. ATC  Security-Identifier. ATC  Security-Identifier. ATC  NORBE ELECTRON  Security-Identifier. ATC  Security-Identifier. ATC  NORBE ELECTRON  Security-Identifier. ATC  NORBE ELECTRON  Security-Identifier. ATC  NORBE ELECTRON  Security-Identifier. ATC  NORBE ELECTRON  NORBE ELECTRON  Security-Identifier. ATC  Security-Identifier. ATC  NORBE ELECTRON  Security-Identifier. ATC  Security-Identifier. ATC  NORBE ELECTRON  Security-Identifier. ATC  Security-Identifier. ATC  Security-Identifier. ATC  NORBE ELECTRON  Security-Identifier. ATC  Security-Identifier. ATC  Security-Identifier. ATC  NORBE ELECTRON  Security-Identifier. ATC  Security-Identifier. ATC  Security-Identifier. ATC  Security-Identifier. ATC  NORBE ELECTRON  Security-Identifier. ATC  Security-Identifier. ATC  Security-Identifier. ATC  NORBE ELECTRON  Security-Identifier. ATC  Security-Identifie		HACKLEY MAY, AUX
NVLNYS FEE-SPONSORED ADR  INVLNYS FEE-SPONSORED ADR  Dividend Option Cash  Security Identifier INNSY  I SAINSBURY FLC.SPONSORED ADR.NEW  Dividend Option Cash  Security Identifier 15ANY  KT CORE SPON ADR  Ownerd Option Cash  Security Identifier ABOR  CONNIKELIKE ABORD TO SPONSORED ADR.REW  Dividend Option Cash  Security Identifier ABOR  NORTH ELEC PUNK COSPONSORED ADR.RESTG  SINH USSOGES HOGS H.2 SHS  Security Identifier INSP  NORTH ELEC PUNK COSPONSORED ADR.RESTG  Social Identifier ABORD TO SPONSORED  ADR.  Security Identifier ARROW  Dividend Option Cash  Security Identifier ARROW  Security Identifier ARROW  NORTH ELEC PUNK COSPONSORED  ADR.  Security Identifier ARROW  SECURITY INSPECTOR AND SPONSORED  ADR.  SECURIT		Dividend Option: Cash
INVENSYS PLC-SPONSORED ADR  Divident Ciption: Cash Security Identifier - INST- 1 SAINSBURY PLC-SPONSORED ADR-NEW  Divident Opport. Cash  Security-Identifier - ISAN+  KT CORD SPONL ADR  Divident Option: Cash  Security-Identifier - ISAN+  KONINKLIUK AHOLI INY SPON ADR NEW  Divident Option: Cash  Security-Identifier, AHC  NONIKELEC PUR CO. SPONSORED - ADR RPSTG  ENHAUSSOREST-1063-17-2415  Divident Option: Cash  Security Identifier: NEP  NARKS & SPENCIR CROUP PLC. SPONSORED  ADR  Divident Option: Cash  NARKS & SPENCIR CROUP PLC. SPONSORED  Divident Option: Cash  NARKS & SPENCIR CROUP PLC. SPONSORED  SECURITY INTERPRETATION OF THE ADVENCIR  NARKS & SPENCIR CROUP PLC. SPONSORED  Divident Option: Cash  NARKS & SPENCIR CROUP PLC. SPONSORED  SECURITY INTERPRETATION OF THE ADVENCIR  NARKS & SPENCIR CROUP PLC. SPONSORED  Divident Option: Cash  NARKS & SPENCIR CROUP PLC. SPONSORED  Divident Option: Cash  NARKS & SPENCIR CROUP PLC. SPONSORED  Divident Option: Cash  NARKS & SPENCIR CROUP PLC. SPONSORED  SECURITY INTERPRETATION OF THE ADVENCIR CROUP PLC. SPONSORED  AND CROUP OF THE AD		Security Identifiae INC
Divident Option: Cash Security Identities - INNSY I SAINSBURF PLCSPONSORED ADRINEW OWNERD OPPONSORED ADRINEW OWNERD OPPONSORED ADRINEW OWNERD OPPONSORED AND NEW OWNERD OPPONSORED AND NEW OWNINKLINKE AHOLD NV SPON ADR NEW OWNINKLINKE AHOLD NV SPON ADR NEW OWNINKLINKE AHOLD NV SPON ADR NEW OWNINKLINKE AHOLD NV SPONSORED ADR RFSTG Security Identifies - AGE SOUTH JUBBLIC - AGE OWNINKLINKE SPENCIR CROUP PLC. SPONSORED ADRIC - ASPRICER CROUP PLC. SPONSORED NOTIVE JUBBLIC - AGE OF A SPENCIR CROUP PLC. SPONSORED ADRIC - ASPRICER CROUP PLC. SPONSORED SOUTH JUBBLIC - AGE NOTIVE J		INVENCYC DIC CONTODER ADD
Securit dentifier INSY Securit dentifier INSY Securit dentifier INSY Dividend Option: Cash Securit-dentifier ADR  WORKE ELEC PUNE CS PONSORED ADR NEW Dividend Option: Cash Securit-dentifier. ATG Securit-dentifier. ATG Securit dentifier. ATG Dividend Option: Cash Securit dentifier. ATG Securit dentifier.		Dardend China Cash
1 SAINSBURY PLC. (280 N. CORED ADR. NEW Dividend Opion. Cash Security-Identifier: 15APF KT CORE SEOUL ADR Dividend Opion. Cash County-Identifier. ATC KONINKLINK AHOLD IN SPON ADR. NEW Dividend Opion. Cash Security-Identifier. AH.C Security-Identifier. AH.C Security-Identifier. AH.C Dividend Opion. Cash Security Identifier. REP NARKS & SPENCIR CROUP PLC. SPONSORED ADR Security Identifier. REP NARKS & SPENCIR CROUP PLC. SPONSORED Dividend Opion. Cash Dividend Opion. Cash Security Identifier. REP NARKS & SPENCIR CROUP PLC. SPONSORED Dividend Opion. Cash Security Identifier. RM SECURITY IDENTIFIER STATES SECURIT		Committee Infantifican MAION
Dividend Option: Cash  Recomp Identifier: Staff  K CORP SPON ADR  Owderd Option: Cash  Security-Identifier: AGR  Connikating Andron DNY SPON ADR NEW  Dividend Option: Cash  Security-Identifier: AGR  Security-Identifier: AGR  Dividend Option: Cash  Security Identifier: AGR  NARKS & SPENCER CROUP PLC. SPONSORED  ADR  Dividend Option: Cash  Security Identifier: AGR  Dividend Option: Cash  NARKS & SPENCER CROUP PLC. SPONSORED  ADR  Security Identifier: AGR  Dividend Option: Cash  NARKS & SPENCER CROUP PLC. SPONSORED  ADR  Security Identifier: AGR  NARKS & SPENCER CROUP PLC. SPONSORED  NARKS & SPENCER CROUP PLC. SPONSORED  ADR  Security Identifier: AGR  NARKS & SPENCER CROUP PLC. SPONSORED  ADR  Security Identifier: AGR  NARKS & SPENCER CROUP PLC. SPONSORED  ADR  Security Identifier: AGR  NARKS & SPENCER CROUP PLC. SPONSORED  ADR  NARKS & SPENCER CROUP PLC. SPONSORED  ADR  SECURITY IN THE SECURITY IN T		Security Identified INVIST
Security-dentifier - 18AY- KT CORP SPOIL ABR  Dividend Option: Cash Security-dentifier. Alic KONINKLILIKE ABOUT NUY SPON ADR NEW Bividend Option: Cash Security-dentifier. Alic KOREA ELEC PUNT CO SPONSORED ADR 8PSTG  Elin # USSOBEST HORE - 1/2 SHS  Dividend Option: Cash Security dentifier. KEP  NAM RICK & SPENCIE CROUP PLCSFONSORED  ADR  Dividend Option: Cash Security dentifier. KEP  NAM RICK & SPENCIE CROUP PLCSFONSORED  ADR  Security dentifier. Cash  NAM RICK & SPENCIE CROUP PLCSFONSORED  ADR  Security dentifier. Cash  NAM RICK & SPENCIE CROUP PLCSFONSORED  ADR  Security dentifier. Cash  NAM RICK & SPENCIE CROUP PLCSFONSORED  AND RIC		JAHNSBURY RICSFUNSORED ADK-NEW
K CORD SEOUT ADR.  KT CORD SEOUT ADR.  Dougler COCCOUNTY CONTRACT  Seouth-deventine: ATC  KONINKLINK AHORI NY SPON ADR NEW  Dividend Option: Gash  Seouth-deventine: AHC  Seouth-deventine: AHC  SEOUTH Petriffer: AHC  SEOUTH Petriffer: AHC  SEOUTH Petriffer: ABC  NARKS & SPENCIR GROUP PLC. SPONSORED  ANARKS & SPENCIR GROUP PLC. SPONSORED  ANAROM OPTION OF ANAROM  SEOUTH Petriffer: ARRAY  SEOUTH Petriffer: ARRAY  SEOUTH Petriffer: ARRAY  NARKS & SPENCIR GROUP PLC. SPONSORED  AND SEOUTH Petriffer: ARRAY  SEOUTH Petriffer: ARRAY  SEOUTH Petriffer: ARRAY  SEOUTH Petriffer: ARRAY  ARRAY  SEOUTH PETRIFFER: ARRAY  ARRAY ARRAY  SEOUTH PETRIFFER: ARRAY  ARRAY ARRAY  ARRAY ARRAY  ARRAY ARRAY  SEOUTH PETRIFFER: ARRAY  ARRAY ARRAY  ARRAY ARRAY  ARRAY ARRAY  ARRAY ARRAY ARRAY  ARRAY ARRAY ARRAY  ARRAY ARRAY  ARRAY ARRAY ARRAY  ARRAY ARRAY ARRAY  ARRAY ARRAY ARRAY  ARRAY ARRAY ARRAY  ARRAY ARRAY ARRAY  ARRAY ARRAY ARRAY  ARRAY ARRAY ARRAY ARRAY  ARRAY ARRAY ARRAY ARRAY ARRAY  ARRAY ARRAY ARRAY ARRAY ARRAY ARRAY ARRAY ARRAY  ARRAY AR		Unidend Option Cash
KY CORP SPON ADR  DWIGHT ODGOT. CBST  Security-Identifier. ACI  KONINKLINE. ARIOTA INV SPON ADR NEW  Dividend Option: CBST  Security-Identifier. ACI  Security-Identifier. ACI  Dividend Option: CBST  Security Identifier. NEP  MARKS. A. SPENCIR. CROUP PLC. SPONSORED  ADR.  Dividend Option: CBST  Security Identifier. NEP  MARKS. A. SPENCIR. CROUP PLC. SPONSORED  Dividend Option: CBST  Security Identifier. ACI  NAME A. SPENCIR. CROUP PLC. SPONSORED  Dividend Option: CBST  NAME A. SPENCIR. CROUP PLC. SPONSORED  Dividend Option: CBST  NAME A. SPENCIR. CROUP PLC. SPONSORED  AND SPONSORED  Dividend Option: CBST  NAME A. SPENCIR. CROUP PLC. SPONSORED  AND SPONSORED  DIVIDENT CROUP SPONSORED  NAME A. SPENCIR. CROUP PLC. SPONSORED  AND SPONSORED  DIVIDENT CROUP SPONSORED  NAME A. SPENCIR. CROUP SPONSORED  NAME A. SPENCIR. CROUP SPONSORED  DIVIDENT CROUP SPONSORED  NAME A. SPENCIR. CROUP SPONSORED  NAME A. SPENCIR. CROUP SPONSORED  DIVIDENT CROUP SPONSORED  NAME A. SPENCIR. CROUP SPONSORED  NAME A. SPENCIR. CROUP SPONSORED  NAME A. SPENCIR. CROUP SPONSORED  DIVIDENT CROUP SPONSORED  NAME A. SPENCIR. CROUP SPONSORED  NAME A		Security Identifier—ISAIY
Dowdent Obtain Cash Security Identifier, At C KONINKLIIKE AHOLD INY SPON ADR NEW Briteland Optain Cash Security Identifier, AHO NOREA ELEC PUN CO SPONSORED ADR RPS 1G Sink Ussoeds Hees - 1/2 SHS Security Identifier. REP NANKS & SPENCER GROUP PLC SPONSORED ANARIC & SPENCER GROUP PLC SPONSORED Optain Cash Dividend Option Cash Security Identifier. REP NANKS & SPENCER GROUP PLC SPONSORED Security Identifier MRN SY Security Identifier MRN SY		KT CORP SPON ADR
Security-destifier. KTC  KONINKLINK AHOLEI NV SPON ADR NEW  Boutpe-destifier. AHO  Security-destifier. AHO  Security-destifier. AHO  Sinke-US-Goest-Heet-AP-SHS  Sounderd Option: Cash  Security destifier. KEP-  NARKS & SPENCIR CROUP PLC.SPONSORED  ANGRES - PRINCIR CROUP PLC.SPONSORED  Security destifier. KEP-  NARKS & SPENCIR CROUP PLC.SPONSORED  Security destifier. Cash  Dividend Option: Cash  Security destifier. Cash  RINKS  Security destifier. MRKS  Security destifier. Cash  MRKS  Security destifier. Cash	¥	Dividend Cather Cath
KONTACEMENT NEW KONTKLIKE HOUTH NY SPON ADR NEW Bividend Optom Cash Security Identifier. AND KOREA ELEC PUNT CO SPONSORED ADE RPSTG  KOREA ELEC PUNT CO SPONSORED ADE RPSTG  BINWHUSSORESHIBETH PLSTG  Security Identifier. KEP  NAME & SPENCIE CROUP PLCSFONSORED  ADR  Bividend Option: Cash  Security Identifier. MR KNKY  Security Identifier. MR KNKY	•	County Identifican VTC
KONINKUIKE AHOTA NY SPON ADR NEW  Byteled Option Cash Securptulantifier, AHC  Securptulantifier, AHC  KOREA ELEC PUR CO SPONSORED ADR RPSTG  ENNANCA ACTION CASH SCUMPLESCORESTHORT AP SHS  SECURPTULE CROUP PLC.SPONSORED  ANARICA ASPENCIR CROUP PLC.SPONSORED  Byteled Option Cash  Dividend Option Cash  Security Chemister MR  Security Chemister MR  NARCY  Security Chemister MR  NARCY  Security Chemister MR  NARCY  Security Chemister MR  NARCY  SECURITY CHEMISTER  NARCY  SECURITY	> 1	Detury Hornander Ale
Dividend Option: Cash Security-Hamilian—AHO.  WORRELIEC PURIONE AHO.  WORRELIEC PURIONE AHO.  Dividend Option: Cash Security Hentifier—KEP MARKEL & SPENCIR GROUP PLCSFONSORED  ADR.  Dividend Option: Cash Security Hentifier—KEP  MARKEL & SPENCIR GROUP PLCSFONSORED  ADR.  Security Hentifier—Cash  ADR.  Security Hentifier—Cash  ADR.  ANNEYS ANNEYS  Security Hentifier—Cash  ADR.  ANNEYS  Security Hentifier—Cash  ANNEYS  ANN		KONINKLIKE AHDLD NY SPON ADR NEW
Security Identifier, AIG.  KOREA ELEC PMR CO SPONSORED ADR RFSTG.  ENAMUSSORESHORT 1/2 SHS.  Dividend Option: Cash  RANKS & SPENCER CROUP PLC. SPONSORED  ANDR.  Dividend Option: Cash  Excurity Identifier. KER  ANDR.  Security Identifier. KER  ANDR.  Security Identifier. KAR  NARKS		Dividend-Option: Cash-
KOREA ELEC PUR CO SPONSORED ADR RPSTG ENAM-USSORESH-1063-172-5415 Dividend Option Cash Security Hernitien - KEP MARKS & SPENCIR GROUP PLC. SPONSORED ADR Schindend Option-Cash Schindend Option-Cash Schindend Option-Cash	, ,	
ENN#USSORGEHOET-HP2-SHS  Dividend Option: Cash  Securit Healther, KEP  MARK'S, SPENCIE GROUP PLCSFONSORED  ADR  Schildend Option: Cash  Bividend Option: Cash  Schildend Option: Cash  Reserved  Res	a C section of the	KAREA ELECTRICATOR CONCOUNTS AND DOCTO
Dividend Option Cests  Security Identifier: KEP  MARKS & SPENCER CROUP PLCSPONSORED  ADR  Dividend Option-Cests  Security Identifier: MARKS	a some second	ICHARISTOCZ 110cz 17 CUC
Undend Option: Cash. Scoulf Ventifier (RP) NATAKA & SPENCIR CROUP PLC. SPONSORED ADR. ADR. Solindend Option: Cash Dividend Option: Cash Solindend Option: Cash	and photograph	
Security Identifier - KEP  MARKS & SPRICER CROUP PLC.SPONSORED  ADR  Dividend Option-Cash Security Identifier MARKS	- manufacture and a	A CONTRACTOR OF THE PARTY OF TH
MÄRKS & SPENCER CROUP PLC. SPONSORED ADR. Dividend Option-Cash Security Lefentier Markey	•	Security Identifier. KEP
Security Vientifier MARY		MARKS & SPENCER GROUP PLC SPONSORED
Security Healther MARKY	· ·	ADR Part of the Committee in the state of the Committee o
Security Mentiner MARKY		Dividend-Bation-Cash
	:	Secunty Identifier MAKSY

a Assumitary	and the second s	
Someoni de la companya de la company	The second secon	-
Salina -	- CAPACET TO MANY THE PROPERTY OF THE PROPERTY	-
- Spirit of the	THE PROPERTY AND A STATE OF THE PROPERTY OF TH	4
- Common Spocks	THE PARTY OF THE P	******
ŧ	The second secon	And the special and the special state of the specia
MAISUSHIIA ELECINOLLID ADR	TELEFORM	and the special of a special definition of the following and the special deposits of the special depos
designation of the second of t	The Date of the Control of the Contr	Management of the second
CANDEL CONTRACTOR OF THE PROPERTY OF THE PROPE	The state of the s	
The second of th	A AMERICAN CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR AND	population
	Company of the Compan	******
WILLIA HUGS INCADE COM	Commence of the control of the contr	10000
	The state of the s	was a second
Divident Option: Cash		
Courte Married M. CA		
The state of the s		
WITCHTORY OF THE CONTROL OF THE CONT	The second secon	
The state of the s	Adjust a harmonic manifest of plants of the second control of the second control of the second of th	****
The same of the sa	The state of the s	age registers
resonance as the amountained and amountained the second se	The state of the s	And the state of t
Underd Uplion Cash	The state of the s	hadron do to be and individual of the control of
And the second Comment of the second of the		1
Secury Identifier. M.I.F.		
NECTE CA COMCOBER ANDS DECEMENTS	THE REAL PROPERTY AND THE PROPERTY AND T	
MENTE AND THE MENTE WHILE THE PROPERTY OF THE	The same of the sa	
Dividend Ontron: Cash	TO SERVICE AND CONTROLLED AND CONTROL A	
The Part of the Control of the Contr	and the control of th	
Secury Identified. NSKOT	A man comment with the first of the following of the first	
NIKKO CODIAL CODE IADAM AND	The second secon	·
The state of the s	a property of the same of the	
DIVIDENT OBLIGHTON CASH	Anthony Contract Anthony Contract and Contra	
The second secon	A THE RESERVE AND ASSESSMENT OF THE PROPERTY AND ASSESSMENT OF THE PROPERTY OF	
Security dentifier WIKOK	to the second or the second or the second or the second or the second of the second or	
The second secon	The second secon	
THE PROPERTY OF THE PARTY OF TH	13,607.80	:
The state of the s	The state of the s	***
		The same of the same of the same
- Dadend Option Cach		-
The state of the s		
Security Identifier (N)		
WORMING THE DOCUME COOKING AND	100000	
TOWNSON HEAD INC. SPONSONEY ADK	2,627.30	
Dividend Ordion: Cash	AND A CONTRACT OF A CASE OF THE PROPERTY OF TH	and and an order of the con-
Construction and to construct the first statement of the first state	<ul> <li>International Company of the Company o</li></ul>	1
Securify Identifier Wife	personal of the state of the st	years.
NOBIE NEGATORY CONTRACTOR	A TENNETH STREET, AND A STREET	,
NONTENERS CARTINET CONTINUES OF THE PROPERTY O		,
SINE ASSESSED IN THE PROPERTY OF THE PROPERTY	<ul> <li>philosopie and with the distribution of the control o</li></ul>	
Anti-photography princip trades to a distribution of the state of the	100 C . White the Art of the Color of Security S	
UMdend Option Cash	a or any Compilerate office or infrastructure, as a provide an experimental and assume the compileration of the co	;
CALL MARKET THE PARTY OF THE PA	the second secon	
Secretarion control of the second sec	a to go appetition and a second	1
The state of the s		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
THE THE PARTY OF T		***************************************
Separation - Commence of the C	A TOTAL OF THE PROPERTY AND A SECRETARY OF A SECRETARY OF THE PROPERTY OF THE	and the commence of the commen
e promound and a supplied of the supplied of t	to the contract to the property contract to the contract to th	the second second
AND THE PERSON OF THE PERSON O	The same of the sa	The second secon
The second contract of	With the time of the contract and the co	-
Control of the Contro	to a second and the s	phase of the party of the party of
WALLIANCE INCIDENCE	3.503.25	debray of the second second second
SPONTOS POR CONTRACTOR	The section of the transport problem to the section of the section	Appropriate and the state of th
the contract of the second sec	enterent of the contract of the communication of the communication of the contract of the cont	district to special of the district of their description of
- This is the second of the se	consideration of the second se	Andrews a mendionifferent forth
And interest of the second sec	CONTRACTOR STANDARD AND AND AND AND AND AND AND AND AND AN	And the second s
Videntias et al annual (in the control of the contr	medical section of the section of th	And with the tendent and the form of recommendations
SANOH-AVENTS SPONS ADR	Continued 1886 Therest the continues of the continues the	The state of the s
SCINELING COLONIAL SCOTO CALLED COLONIAL SCO	and the control of the first of the control of the	THE RESIDENCE OF PERSONS AND PROPERTY.
CALL TO THE PROPERTY OF THE PR	e y popularity e in a constructive qualitate destructive and extensive entractions of the state of the state of the state of the property of the state of the sta	the property of the court
Unidend Option: Cast	to the second second and a second sec	and the second s
solve a second s	to the complete of the property of the complete of the complet	a color management
Security Talking Say	TO THE THE COMMITTEE OF THE PARTY AND A STREET AND A STREET ASSESSMENT OF THE PARTY AND A STREET ASSESSMENT AS	A ser a service of the service of th
Promoted Continues and the Continues of	THE STATE OF THE PROPERTY AND ADDRESS OF THE PROPERTY ADDRESS OF THE PROPERTY AND ADDRESS OF THE PROPERTY	can a server idealersteamentquelles
and a second contract of the c		AND THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER.
The state of the s	THE PARTY OF THE P	The state of the s
and the contractions and the contraction of the con	A STATE OF THE PROPERTY OF THE	
AND THE PARTY OF T	THE REPORT OF THE PROPERTY OF	

SCHERING'AC'S PONS'ADR  By Widend Option: Gash Security Identities: SIRB  SONY CORPADR AMERN SIT NEW  By Widend Option: Gash Scarity Identities: SIRB  STAIRCROELECTRONICS NV SHS NY REGIST  Dividend Option: Gash Scarity Identities: SIRBY SCHIRTONO-MITSUH-FINL. CROUP INC ADR  SUMITONO-MITSUH-FINL. CROUP INC ADR  SCALITY IDENTITIES: SIRBY SCALITY IDENTITIES	SCHERING G SPONS ADK  Scuint Jednutier SH  SOUNT CORPADIR AMERN SH 'NEW  SOUNT JEDNUTE SH  SOUNT JEDNUTE SH  SOUNT JEDNUTE SH  SECURITY	
SCHEMING A CRONK ADR.  SCATIFICATION CROWN STATE  STATE OF SCATIFICATION  SCATIFICATION  SCATIFICATION  SCATIFICATION  SCATIFICATION  STATE OF SCATIFICATION  STATE OF SCATIFICATION  STATE OF SCATIFICATION  SCAT	**CHERING A C SPONS ADR.  **SCHOPLING A C SPONS ADR.  **SCHOPLANE AND PARENT SH'NEW  **Dividend Option: Cash  **Security Identifier: SNE  **SECURITY IDENTIFIES: SNE  **SE	
Scanit Lengter, State Scanit Lengter, Scan Scan Scan Scan Scan Scan Scan Scan	Buildend Option: Gash Security Jednutie: SHR Buildend Option: Gash Security Jednutie: SHR Security Jednutie: SNR S	
Secury Full International California Califor	Security dentitier, STR. SOUNT CORP. NOT FAME MEN SH' NEW Bindend Option: Cash Security Identifier, SIN. STAICKOELECTRONICS NV SHS N Y REGISTRY Bindend Option: Cash Security Identifier, SIM. SUMITONIO MITSUI FINI. GROUP INC ADR SCHARTONICS SIM. SUMITONIO MITSUI FINI. GROUP INC ADR SCHARTONICS SIM. SECURIT Identifier, SIM. SECURITY Identifier, SIM. SECURITY Identifier, SIM. TELECOM, ITALIA S. P. A NEW SRONS, ADR. TELECOM, ITALIA S. P. A NEW SRONS, ADR. REPSICORD SHS. Security Identifier, SIM. TELECOM, ITALIA S. P. A NEW SRONS, ADR. REPSICORD SHS. SECURITY IDENTIFIER STATUS SECURITY STATUS SECURITY SE	
SOUR CORPADR AMERICAL SH'NEW  SOUR CORPADR AMERICA SH'NEW  SOUR CORPADR AMERICA SH'NEW  SOUR CORPADR AMERICA SH'NEW  SOUR CREATER CORPADR  SOUR CREATER SHOWN  SOUR CR	SONY CORPADRAMEN SH'NEW  Modered-Option-Cash Security Identifier "NIE"  STMICKOELECTRONICS NV SHS N Y REGISTRY  Dividend-Option-Cash Security Identifier "SIM  SUMITON OMITSUI-FINE GROUP INC ADR  Dividend-Option-Cash Security Identifier "SIM  SUMITON OMITSUI-FINE GROUP INC ADR  Dividend-Option-Cash Security Identifier "SIM  TELECOM FROM SPON ADR  RESTICATION SHS  SECURITY IN ST SPONSORED ADR  RESTICATION SHS  TELECOM ARGENTIMA ST SPONSORED ADR  RESTICATION SHS  SECURITY IN ST SPONSORED ADR  RESTICATION SHS  SECURITY SHS ST ST SPONSORED ADR  RESTICATION SHS  SECURITY SHS ST ST SPONSORED ADR  RESTICATION SHS  SECURITY SHAPPEND SHS  SECURITY SHS ST ST SPONSORED ADR  SECURITY SHS ST SPONSORED ADR  SECURITY ST	
Divident Option Cash Scientification Cash Statemark Thirt GRoup INC ADR Divident Option Cash Statemark Thirt GRoup INC ADR Divident Option Cash Statemark Thirt GRoup Mark Stones Adr. Statemark Thirt Cold Market Thirt GRoup Inc. Scientification Cash Statemark Thirt Cold Market Thirt Adr. Statemark Option Cash Divident Option Cash Statemark Thirt Cold Market Thirt Adr. Statemark Option Cash Scientification	Bywidend-Option: Cash Seconty/Identifier_SNE STANICORO MITSUL FINE STANICORO MITSUL FINE SECONTY Identifier_SNE SOUNTY IDENTIFIER_SNE SOUNT	
SECURIVE DESIGNEY TO RECEIVE A SECURIVE DISTRICT OF THE SECURIVE DISTRICT OF THE SECURIVE DISTRICT OF THE SECURITY OF THE SECU	Security Identifier SNE  SECURITY Identifier SNE  STANICKOELECKRONICS NV SHS N Y REGISTRY  Dividend Option: Cash  SCAUTT CASH CROUP INC ADR  SCAUTT CASH CASH  SCAUTT	
SIMICROELECTRONICS ANY SIES NAY REGISTRY  SUMMICHAL CHOULD CASH.  SUMMICHANDER CASH.  SUMMICHAL CHOULD NIC ADR.  SUMMICHAL CHOULD CASH.  SUMMICHAL CHOULD NIC ADR.  SUMMICHAL CHOULD CASH.  SUMMICHAL CHOULD CASH.  SECURIT CHEMITER CASH.  SUMMICHAL CHOULD CASH.  SECURIT CHEMITER CASH.  SUMMICHAL CHOULD CASH.  SUMMICHAL SPONS ADR.  SUMMICHAL CHOULD CASH.  SUMMICHALL CASH.  SUMMICHAL CHOULD CASH.  SUMMICHALL CASH.	STMICKO ELECTRONICS NV SHIS NY FREGISTRY  Dividend Copion: Cash SCOUTH CHROTHER SHIP SUMITOR MITSUIT FINE SUMITOR MITSUIT FINE SUMITOR MITSUIT FINE SUMITOR MITSUIT FINE SCOUTH SHIP ST PANE STANE SCOUTH SHIP ST PANE STANE S	
Dividend Option-Cash Securit Statistics: SMY Securit SMS Securit SMS Securit SMS Securit SMS SECURITION	Dividend Option: Cash Securit/Identife: X1M SUMITONIO MITEU: TINL SCOTIN/IdenIO DividenCash Securit/IdenIO DividenCash Securit/IdenIO DividenCash Securit/IdenIO DividenCash Securit/IdenIO DividenCash Securit/IdenIO SAN Securit/IdenIO SAN Securit/IdenIO SAN Securit/IdenIO SAN Securit/IdenIO SAN Securit/IdenIO SAN TELECON ITALIA S. P.A.NEW SRONS ADR. REPSITCRU X1S Security IdenIO SAN S	
Securit Identifier. 5.TM. Submit Object. Cash Securit Identifier. 15th	Securit Identifier STIM Stuff Obort Cash Securit Identifier SAIP Swinstein Spoon Cash Securit Identifier SAIP Swinstein SPON ADR Securit Identifier SAIP Swinstein SPON ADR Securit Identifier SAIP Swinstein SPON ADR Securit Identifier SAIP Swinstein SPON SAIR Securit Identifier SAIP SECURIT	
SUMITOMO MITSUITENE GROUP INC ADR  Excurriterative: Saint SANISSEEM FROM ADR  SANISSEEM FROM FROM ADR  SANISSEEM FROM FROM ADR  SECONITATION STATEMENT SANISSEEM  SECONITATION SANISSEEM SANISSEEM SANISSEEM  SECONITATION SANISSEEM SANISSEEM SANISSEEM SANISSEEM  SECONITATION SANISSEEM SAN	SUMITOMO MITSUI FINL GROUP INC ADR Linicand Option. Cash Securit Identifier: SMSTY SWINSSEGME FORM ADR Linicand Option. Cash Securit Identifier: SMST LILICOM TABLE SP A NEW SRONS ADR RESIDENCY SS RESI	
Dividend Option: Cash Security Identifier: SMEY Was Seed A PERVA ADR.  Security Identifier: SCA INVESTIGATION STATES  SECURITY IDENTIFIER STATES  SECURITY IDEN	Dividend Option: Cash Securit Identifier SMEN TELECOM TITALA 5 P. A. NEW SRONS ADR. TELECOM TITALA 5 P. A. NEW SRONS ADR. TELECOM TITALA 5 P. A. NEW SRONS ADR. TELECOM ARGENTINA 5 A SPONSORED ADR. REPSTICAS CL. B. ORD SMS RESTICAS CL. B. ORD SMS Contint Identifier. Till TELECOM ARGENTINA 5 A SPONSORED ADR. A. SECURITY CASH Security Identifier. Till The Contint Identifier. Till Security Ide	
Securit deputier 2MEN SWISSCOM-SPON-ADR SWISSCOM-SPON-ADR SWISSCOM-SPON-ADR SWISSCOM-SPON-ADR SWISSCOM-SPON-ADR SWISSCOM-SPON-CSSI SWISSCOM-SPON-CSSI SWISSCOM-SPON-CSSI SWISSCOM-SPON-CSSI SWISSCOM-SPON-CSSI SWISSCOM-SPON-CSSI SWISSCOM-SPON-CSSI SWIM-SPON-CSSI SWIM-SWISSCOM-SPON-CSSI SWIM-SWISSCOM-SPON-CSSI SWIM-SWISSCOM-SPON-CSSI SWIM-SWISSCOM-SPON-CSSI SWIM-SWISSCOM-SPON-CSSI SWIM-SWISSCOM-SPON-CSSI SWIM-SWISSCOM-SPON-CSSI SECURIT CORRESTOR SWING-SPON-CSSI SECURIT CORRESTOR SWING-SSI SECURIT CORRESTOR SWING-SSI SECURIT CORRESTOR SWING-SSI SECURIT CORRESTOR SWING-SSI SW	Secury Designation and Secury Designation and Secury Designation and Secury Designation and Secury Designation Cash.  Source Identifier—Sch.  TELECOM-ITALIA S. P. A. NEW SEONS ADR.  RESTGGED SHS.  Source Generalists T.  TELECOM-ITALIA S. P. A. NEW SEONS ADR.  RESTGGED SHS.  Source Control of Shs.  RESTG S. C. B. ORD SHS.  RESTG S. C. B. ORD SHS.  Ondern Option Cash.  Security Jeantifier—TEL.  A. S.	
Security dentifier SOM  TRIEGOM FAIRN STANDS  Security Identifier SOM  TRIEGOM FAIRN SON  SOUTH IN THE COM FAIRN SON  SON SON SON SON  SON SON SON SON  SON SON SON SON  SON SON SON SON  TRIEGOM FAIRN SON  SON SON SON SON  TRIEGOM FAIRN SON  SON SON SON SON  TRIEGOM FAIRN SON  TRIEGOM  TRIEGOM FAIRN SON  TRIEGOM	SWISSEOM FION ADD. SWISSEOM FOON ADD. Dividend Option: Cash Security Identifier. SCM. TELECOM ITALIA S. P. A NEW SPONS ADR. REPSICORUS SIS. Dividend Option: Cash Security Identifier. 11. TELECOM TAKENTINA S. R. SPONSORED ADR. REPSICOM ARGENTINA S. R. SPONSORED ADR. REPSICOM Cash Scuttification: 1. E. C.	
SWISSCOME PON ADR.  DIVIDENT CRAIM.  SCHOOL FURTHELLS S. A. NEW SRONS ADR.  TELECOM TRALLA S. P. A. NEW SRONS ADR.  TELECOM TRALLA S. P. A. NEW SRONS ADR.  TELECOM ARCENTINA S. A. SPONSORED ADR.  TELECOM ARCENTINA S. A. SPONSORED ADR.  TELECOM ARCENTINA S. A. SPONSORED ADR.  SCHOOL STATESTANDS.  DIVIDENT CASH.  SCHOOL CASH.  TELECOM CORP. OF NEW TELEAND I.TO.  SPONSORED ADR. C. C. NEW TELEAND I.TO.  SPONSORED ADR. C. C. S. A. A. D. C. C. A. S. C. C. C. A. S. C. C. C. A. S. C.	SWISSCOM-SPON ADR  Divident Option: Cash  Security Heruiter - Sch  TELECOM-ITALIA S. P.A.NEW-SRONS ADR.  REPSTICIRUSHS  Security Jeanifer - Sch  REPSTICIRUSHS  REPSTICIRUSHS  Control Jeanifer - II  TELECOM RECENTINA S. A SPONSORED ADR  REPSTIC S. C. B. ORD SHS  REPSTIC S. C. B. ORD SHS  Ondern Option: Cash  Security Jeanifer - TEST  Security Jeanifer - T	
National Options Cash Security Heartifer - SCAI RECOMMINING SP A-NEWSRONS ADR. REPLOKATING SP A-NEWSRONS ADR. REPLOKATING SP A-NEWSRONS ADR. Deviced Heart - SCAI REPLOKATING SP A-NEWSRONS ADR. REPLOKATING SP A-NEWSRONS ADR. RESTINGUISTING THE CASH Security Library ZEALAND LID. SCAINFULGRATOUT CASH Security Library CASH Deviced Options Cash TELECON CORP OF NEWS ADR. CLIF REWAINS THE SAME TELECONICA S. A ADR. CORMERLY TELECONICA S. A ADR. CLIF REWAINS THE SAME TELECONICA S. CASH THE SAME	A NEW SPONS ADR. 11,475.20.  M. 5.4. SPONSORED ADR. 15.18.50.  H. 16. 17. 18.50.  H. 16. 18.50.	
Security Identifier. SCM. TELECOM ITABLA S.P. A. NEW SRONS ADR. TELECOM ITABLA S.P. A. NEW SRONS ADR. TELECOM ITABLA S.P. A. NEW SRONS DR. Debated School Self. TELECOM ARCENTINA S.A. SPONSORED ADR. TELECOM CORP. DOR NEW TELEAND U.D. SPONSORED ADR. EACH REP # 0405 5HRS NZ Dividend Option Cash TELECOMICA S.A. ADR. (FORMIERLY)	LA NEW SRONS ADR.  W.S. A. SPONSORED ADR.  1.5.3.8.50	
SECURIT TENENTIER S. S. M. TELECOM TABLA S. P. A. NEW SPONS ADR. REPSIGODY SHE Divident Option: Cash  EVENTION THE COM TREATHING STONSORED ADR REPSIGODY SHE SINELISM STONSORED STONSORED ADR. CHERT PER BOND SHIS. TELECON CORP. OF NEW ZEARMY LID STONY MENTION STONSORED STONSORED ADR. CORP. OF SHIS. NE THE SAME	580NS ADR. 11,1475.20 PONSORET ADR. 3,5318.50	
TELECOM ITALIA S P. A. NÉW SPONS ADR. PENICORIO SIN. SEURIPIDARIMA S P. A. NÉW SPONS ADR. RELECOM ARCENTINA S A SPONSORED ADR. SEURIPIDARIZATIONS. DANGERIC ORDER OF NEW ZEALAND U.D. SPONSORED ADR. J. ACH. REP. 9 9(3) 5185 NZ. DANGERIC ORDER OF NEW ZEALAND U.D. SPONSORED ADR. J. ACH. REVAINS. TELECOMICA S A A ADR. CO.W. REVAINS. HELSONICA S A A ADR. CO.W. REVAINS. HELSONICA S A ADR. CO.W. REVAINS. RELECOMICA S A ADR. CO.W. REVAINS. DANGERIC OPION. CASH. RESPONSORED ADR. J. C. W. REVAINS. RELECOMICA S A ADR. CO.W. REVAINS. DANGERIC OPION. CASH. RESPONSORED ADR. J. C. W. REVAINS. RELECOMICA S A ADR. CO.W. REVAINS.	SPONS ADR. PONSORED ADR. 4518.50	
RESTCARD SHS. Dividend Option: Cash  Excurpt Identifier: Til  TELECON RECENTINA'S A SPONSORED ADR  REPSIGS GLE BORD SHS. SINELISM STATAMON. SINELISM STATAMON. SINELISM CORE. DE SHS. NZ. Securpt Identifier: TEC. TELECON CORE. DE SHS. NZ. SECURPT IDENTIFIER: NZ. TELECON CORE. DE SHS. NZ. TELECON CORE. DE SHS. NZ. TELECONICA S.A. A.D. GORMERLY TELECONICA S.A. T.	PONSORED ADM	
Dividend Option: Cash Security Jaminian - The James A sponsored ADR REFECOM AGENTINA S A SPONSORED ADR REFECOM AGENTINA S A SPONSORED ADR SINH LISA 722723036. SINH LISA 722723036. SINH LISA 722723036. TELECOM CORE OF NEW TELLAND LTD SPONSORED ADR. EACH REP 8 0RD 5HRS NZ Dividend Option: Cash THE SAME THE SAME THE SAME THE SAME Dividend Option: Cash Security Identifier TEF Security Identifier TEF Security Identifier TEF	PONSORED ADIS	
Numerica Seption: Cash Security Jeanifier. Til. TELECOM AUGENTINA 5 A SPONSORED ADR REPSIG 5 CLE 0-000 5H5 Security Jeanifier. Till Security Jeanifier. Till TELECOM CORP. OF NEW ZEALAND U.D. Security Jeanifier. Till TELECONICA 5.A. A.DR. (FORMERLY) TELECONICA 5.A. A.DR. (FORMERLY) THE SAME TELECONICA 5.A. A.DR. (FORMERLY) THE SAME THE SA	PONSORED ADR	
TELECOM AGENTINA 5 A SPONSORED ADR RESTGOM AGENTINA 5 A SPONSORED ADR SINELISATIZATIONS SINELISATIZATIONS SINELISATIZATIONS SOUTH AGENTINA 1 A SPONSORED ADR SECURIT AGENT OF THE PERMANNIN TELECONICA 5 A ADR GORMERLY THE SAME THE SA	PONSORED ADR	
TELECOM ARCENTINA 5-A SPONSORED ADR RESIGE S.C. BE DOLD SHIS SINELISARYZIZZOSA; Dividend Cytion: Cestin Security Lidentifier. TEO TELECOM CORP. OF NEW ZEALAND U.D. STONSORED ADR. EACH REP & ORD SHIS NZ STONSORED ADR. EACH REP & ORD SHIS NZ SECURITY LIGENTIFIER. NZ TELECOMICA 5-A ADR. (FORMERLY) TELECOMICA 5-A ADR. (FORMERLY) THE SAME Dividend Cytion: Cest Security Identifier. TEF Security Identifier. TEF Security Identifier. TEF Security Identifier. TEF	PONSORED ADR	
REPSIGS CL. BORD SINS SINE LISA 7227273096. Divident Option: Cash Securpt Identifier. TEC Divident Option: Cash Securpt Identifier. NEW ZEALAND UD SHONSONED ADR. LOCK BOR SHISS NZ Divident Option: Cash TELECONICA S. A. ADR. GORMERLY THE SAME THE SAME Divident Option: Cash Divident Option: Cash Securpt Identifier. TEF	The properties of the properti	, ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ;
ISIN # ELECTRONICATION OF THE TOTAL OF TOTAL OTAL OF TOTAL OF TOTAL OF TOTAL OF TOTAL OF TOTAL OTAL OTAL OTAL OTAL OTAL OTAL OTA	Continuement of the contin	t t
SIN#TISATOZIOSIS  Divident Option: Cash Security Identifier, TEG Security Identifier, TEG Security Identifier, NEW TELECONICA S. A. ADR. GORMERLY TELECONICA S. A. ADR. GORMERLY THE SAME Divident Option: Cash THE SAME Divident Option: Cash Divident Option: Cash Divident Option: Cash Security Identifier, TEF	The train of a proposal control of a proposa	
Dondent Option: Cash Security Leading: TEO Security Leading: TEO SECONT CORE OF NEW ZEALAND UP SPONSOBED ADR. LECH REP 8 080 5418. NZ Dividend Option: Cash TELEFONICA S. A. ADR. (CORMERLY) TELEFONICA S. A. ADR. (CORMERLY) THE SAME THE SAME Dividend Option: Cash Security Identifier: TEF Security Identifier: TEF	Control of the Contro	
Security dentifier. TEG.  FELECONICA S.A. ADR. (FORMERLY)  Security dentifier. TEG.  THE SAME  Dividend Option Cash  Eleconica S.A. ADR. (CUB REMAINS)  THE SAME  Dividend Option Cash  Security dentifier. TEG.	The state of the s	•
SCHING LORDE OF NEW ZEALAND UP. SPONSORED ADRESCHE OF ORD SHIS NZ SPONSORED ADRESCHE OF ORD SHIS NZ DNIGENZ OPPING TO SEA EVENTY LELEFONICA SEA ADRESCHE REMAINS. THE SPONSORE SEA ADRESCHE REMAINS. THE SAME. DNIGENZ OPPING TESTAND TO SEA TO	THE PART OF THE PA	12 12 12 12 12 12 12 12 12 12 12 12 12 1
TELECON CORE OF NEW ZELIAND UD SPONSONED AUR, EACH NET 8 ORD SHIS NZ DVAGNED OPIGOT CASH Security Henrifier. NET TELEFONICA S. A. A. A. A. G. KORNIERLY, THE SAME DVAGOT OPIGOT CASH Security the nither. TET Security the nither. TET		accomplish activities
SPONSORED ADR. LACH REP 8 ORD-SHISS NZ Danderid Option: Cash Secury Healthier, NET TELEFONICA S. A. ADR. FORMERLY THE SAME THE SAME Dividend Option: Cash Secury themitier: TEF	TIANDITA CITY	
Danden/Option: Cash Securit/dentifier. NT TELEFONICA S.A. ADR. (FORMERLY) TELEFONICA S.A. ADR. (CUR REMAINS) THE SAME Danden Option: Cash Securit/dentifier. TEF	and and an analysis of the second	
Universit Upinoc Cast.  Security Identifier, NLT  FELFONICA S. A. ADR. GORMERLY  TRESONICA DE ESPANA S. A. ADR. CLIF REMAINS.  THE SAME  Dividend Opinic Cast  Security Identifier. TEF	THE PROPERTY AND THE PROPERTY OF THE PROPERTY	
SECURY Identifier. NET TELEFONICA S. A. ANN. FORMERLY) TELEFONICA DE ESPANA S. A. ANN. CLIF REMAINS. THE SAME Dividend Option: Cash Security Identifier. TEF	and an analysis and an analysi	page on
TELEFONICA S.A. ADR. (FORMERLY) TELEFONICA DE ESPANA S.A.ADR. CLIF REMAINS THE SAME Dividend Option. Cash Securit dentifier. TEF	Probability	,
TELEFONICA DE ESPANAS A ADRICUTE REMAINS. THE SAME. Dividend Option: Cash Security dentifier: TEF	THEOMICA S. A. A. M. CORNEDIN.	`
		,
	refression to the second secon	
And the second s	A CONTRACTOR OF THE PROPERTY O	The the particular and the same of the sam
And the property of the control of t	And a second	er conference a contract of the contract of th
And Proposed Contraction of the	and the control and the contro	Parameter design
and the second s	And the second of the second o	Transfer of the Control of the Contr
		Control or Control
	commons of the experimental definition of the experimental of the	a discussion of

| разараны аламанда базаны да селена каке пределения и селена повет<br>выправления на пределения пределения пределения пределения пределения пределения пределения пределения пределения  | Editorial formation for the contract of the co | - supplies and sup | TO SERVICE AND ADMINISTRATION OF THE PROPERTY | en ferse bestit an til en | A CONTRACTOR CONTRACTO | The State of the s |  | (A) (A) Company of the company of th | A TO   | The second secon | a security to the control of the second of t | After particularly described production and project particular and a second of described particular and a second of descri | reference and management and management and another production of the contract of the contract and another and another and another and another and another and another another and another ano | community of the Property of the Community of the Communi | A CONTRACTOR OF THE PROPERTY O | A production production and references are incommended to the production of the prod | The second contraction of the second contrac | An individual description of the contract of t | The same of the sa | to propose the control of the contro | The Association of the control of th | A S S S S S S S S S S S S S S S S S S S  | A TOTAL OF THE PROPERTY OF THE | <ul> <li>** Communication of the communication</li></ul> |                             | product of the produc |   | The second secon | TELONOMIC TO THE PARTY OF THE P | * Volume to the second | A Principles of the Principles | the state of the s | 1 CO CO                          | the same a part proper production of the first and the companion of the same appropriate | The second of th | Company and the company of the compa | 759                              | A popularity of the state of th | and the second of the second o | And a large projection of the contraction of the co | The contract of the contract o | TANADA TANADA MANAGAMBAN MANAGAMB | The controller was a final or experience experience of the first of th | political political in a company of the political politi | The second content of  | To the contract of the contrac | 100000000000000000000000000000000000000 |
|---|--|--|---|---
--	--	--	--
--	--	--	--
--	--	--	--
--	--	--	---
--	---	--	--
---	--	--	----------------------------------
--	----------------------------------	--	--
--	--	--	--
--	--	---	
Resident process an excellent and or the extensive annual formation and the extensive	A PRINCE AND THE REPORT AND THE REPO	Advantate, or construction and an anti-membergia.  Anti-member (in a trial and a state and an anti-membergia.)	

	Printing of the later of the la	The state of the s	
	, the open company is an analysis of the company of	sent for the section of the section	(in a single of the property of the single o
	and design about the state of t	STATE OF THE PARTY AND ADMINISTRATION OF THE PARTY OF THE	The stable of the control of the stable of the stable of the control of the stable of the control of the stable of
	and the control of th	Olle	THE TOTAL CONTRACTION OF THE PROPERTY OF THE P
			Company of the Compan
rdmnes	A U. do. col. pige 1. Clara (National Anthronis and Continuous Con	n and despending an operation of a desirable at an approximation of a special parameter of personal and a security of a security	Color of the color
	THE RESIDENCE OF THE PROPERTY AND ADDRESS OF THE PROPERTY	A CAN THE PROPERTY OF A CAN AND A CAN ASSOCIATED ASSOCIATED AND A CAN AND A STREET AND A CAN ASSOCIATED AND ASSOCIATED AS	yes, a piece a see peep our de despesas provinciposes apriles extensible delaptive extensible
Preferred-Slocks	THE PROPERTY AND PROPERTY OF THE PROPERTY OF T	COLUMN TO COLUMN TO THE COLUMN	THE CONTRACTOR OF THE CONTRACT
7,000	TIM DABTICIDATOR CA COANCAND BEBETS BED	A CHARLES AND	1912 Language Commission Commissi
	THE PARTY OF THE P	La established and an appropriate and the contract of the cont	The state of the s
	DIVICE CONTINC CONTINCT CONTIN	CHARLES AND REPORTED AND THE CONTRACTOR OF AN ARMED SECURIOR SECUR	AND THE PROPERTY OF THE PROPER
Company Special Assessment and	The state of the s	e de la companya del companya de la companya del companya de la companya del la companya de la c	terior of the second of the se
The state of the s	Security Identifier 150	em en	The state of the s

TO THE PARTY OF TH	SERVICE CONTROL OF THE PROPERTY OF THE PROPERT
Commence Co. Le	a to the second contract of the second contra
referencies i Areadon i	in and interpretational interpretational properties of the control
WABORS INDSTITUSES	01.1979
- Dividend Option: Cash -	PAGE 2 on the continue of the Page 2 of the
Serinty Clanitian NRD	A I I I I I I I I I I I I I I I I I I I
Consequence of the Consequence o	The state of the s
NUBLE CURP SHS ISIN#KY G654221004	
	<ul> <li>Processing of the processing of the</li></ul>
Security Manual M.	And the particular of the part
1	The procedural of the procedure of the p
Transferred to the state of the	The second of th
Dividend Option: Cash	
Samply Thanking It	the second state of the se
The state of the s	to the first constitution of the state of th
A STATE OF THE STA	management 1964 1965 and the same of the s
Wilderd Option Cash	The state of the s
The state of the s	
Security Inclinity - New York Control of the Contro	the control of the co
- AMGENTING	STORY OF THE PROPERTY OF THE P
TWO THE CASE OF THE PARTY OF TH	The second of th
Personal and a second s	to be a state of the same and t
Sectific TOPHER MANAGEMENT CONTRACTOR CONTRA	A new contraction that the contract of the con
APPER OF MANAGEMENT	The state of the s
Wilder and State of the Control of t	a manufacture of the second se
DIVIDER DIVIDITY CASH	The state of the s
Security Marking Land	Constitution of the consti
THE RESIDENCE OF THE PROPERTY	
AKUB INC. CUM	
" Dividend-Option Cash	1600 to the conditional and analysis of
Control of the Contro	A in Million and American and a
Security Harman AVF.	Victorian and the second secon
BEUBATT & BEYOND INC	BELLE Sections
Third and Antonia Cath	and the state of t
THE TOTAL PROPERTY OF THE PROP	Annual Conjuntor comprise the state of the s
Security Identifier. BBBY	Property and the Comment
CHARLES-BIVITARDBE-NITI	The second secon
The state of the s	nonto in
and the state of t	· United State of the Contract
Dividend option Cash	a a a a a a a a a a a a a a a a a a a
Commence Corresponding to the Contraction of the Co	The state of the s
TOTAL STREET,	THE STATE OF THE S
CHICAGO MENCANIILE EXCHANGE HIDGS INC	3,373.00
ACTION TO THE PROPERTY OF THE	* * * * * * * * * * * * * * * * * * *
Divided Option Cach	The state of the s
The second control of	
SCHINK LORDINGE (AMERICAN CONTRACTOR CONTRAC	a m C C C C C C C C C C C C C C C C C C
CHICOS-FAS-INC-COM	The state of the s
Tridand Oxform Cathering	The second secon
and department of the state of	African (confidential law) of the state of t
SECULIA (GENITLE)	
	Price of the Artist of the Art

| AMMERICAN CONTRACTOR OF THE PROPERTY OF THE PR | The contract of the contract o | A DESCRIPTION OF THE PROPERTY  |   | AV commence and designed and designey compression on the second of the designey of the designey and designed and designey of the designey of t | Contra (purply-manufactures) (Contraction) (Contraction) (Contraction) (Contraction) (Contraction) | Control and the Control of the Contr | or a second seco | THE TOTAL CONTROL OF THE CONTROL OF  | The second secon | The state of the s | The second secon | Company of the compan | or all properties of the control of  | Administrational and administration of administration of the Control of Administration  | The second control of  | The state of the s | The same of the sa | The state of the s | and the section of th | · · · · · · · · · · · · · · · · · · · | and the state of t | The state of the s |                          | The state of the s | And the second s | Contraction of the Balance and any other fact that the second of the sec | The second control of the second seco | the second experimental and the second experimental exper | To proceed any and any other process and any | The second secon | and the state of t | Water and on the Control of the Cont | a Proposed national residence of the Contract  | to a supply of the control of the co |  | 6,209,60                          |                      |                    |                         | The second secon | 07.53.7.6   |                         |  |                   |                  | to the second se | A THE PARTY OF THE |  | to the state of th | CT 0.00 A | 00000/   | (Approximately approximately and a historical property of the control of the cont | Enterprise control and a management of the control | The state of the s |  | The state of the s | The state of the s | a de la companya del companya de la companya del companya de la companya del la companya de la c | TO A TAX TO | A market out to see the second | The same of the sa | in the contract of the contrac | The contraction of the contracti | company of the Manufacture and the company of the c | A compared to the second control of the seco | Company and a company of the company | and the second s |                      | Antipolitical and Application | TO THE PROPERTY OF THE PROPERT | <ul> <li>A supplication of the content of the c</li></ul> | A 1 Sales Control of the Control of  | the state of the s | a particular and the second se | a sea of an administration and some adjunctive pagement to be a controlled from the property of the property o | to profession that is an Androdomic Management of the state of the sta | to and a second  | TO THE PROPERTY OF THE PROPERT |
|--|--|--|---
--|--|--|--|--
--	--	--	--
--	--	--	---------------------------------------
--	--------------------------	--	--
--	--	--	--
--	--	--	--
--	-----------------------------------	----------------------	--------------------
--	--	--	-----------
--	---	--	--
--	--	--	---
--	--	--	--
--	--	--	--
---	--	--	--
--	--	--	--
--	--		
s approximate of optimization of	Application agrico a main	Terroman and the second	Approximation of the contract
   |  | TOTAL TO THE PROPERTY OF THE P | TRACER CONTRACTOR CONT | Additional control of the second seco | SECURITY ICENTIFICATION CONTINUES CO | Cold III COLD III  | TO THE TAX TO THE TAX  | Dividend Opion Cash  | The state of the s | Decany toenume: Con-                  | COCE COLA COMBANY  |  
   | Living Land Control Lash | William Specification & Comment  | The state of the s | TOTAL PROPERTY OF THE PROPERTY | Dund Onton Cast and a second of the se       | the same of the sa |  | COMMERCE RANCORD INC. N. I.  | THE PARTY OF THE P |  | Control of the Contro | Security/10entitles. C. British   
  | The state of the s | COMMUNITY HEAT IN 313 INC NEW COM | Dividend Option Cash | CONT. In the Cont. | Security Continuer (Vin | The second secon | DELL INCOME | - Dividend Option: Cash | The state of the s | Security (geough) | PMC-CAD-MACC-CAM |  | Dividend Option, Cash  | The state of the s | SECURI DEFINIEL ENC  |           | The state of the s | Commence and LINEAR CHIEFLE CONTINUED TO SERVICE CO | Security Identifier FOG   | TOTAL
DESIGNATION OF THE PROPERTY OF THE PROPE | Value of the second sec | Unidend Option: Cash   | manuscripture School Library CDAV  | COUNTY OF THE PROPERTY OF THE  | ECIRONIC ARTS   | - Man Charles Charles Charles Contraction  | TOTAL TRANSPORT  | Security designer—ENIS   
   | FYDREST STRIPTS INC. TOM   |  | DWidehd Opnon. Tash  | - Security Charles - FRDY  | The state of the s | EXAMPLE RESURCE INC. | Marinian Cache  
   | CALACTER OF THE PROPERTY OF TH | Security Identifier. BEN   | The second second control of the second cont | Benedicture of the second seco | Transportation of the Activity   | dereicht der u   | CONTRACTOR OF THE PROPERTY OF  | Company of the compan |  |

		ATTENDED TO A THE CONTRACT OF
lu	The second secon	ALANDER LEARNY LANDER DESCRIPTION OF THE PROPERTY OF THE REAL PROPERTY OF THE
í	A PROPERTY OF THE PROPERTY OF	CONTRACTOR OF A CONTRACTOR OF THE CONTRACTOR OF
Stocks	A THE PROPERTY OF THE PROPERTY	A CONTRACTOR OF THE PROPERTY O
, 1		
7	STATE OF THE PROPERTY OF THE P	to a complete the contract of
ì		tient deviduoje en o e versejantelejan miliotekskommengementele istiga kan britakiskom intigation optimistiskom hadistakiskom integration
11	Commence of the control of the contr	CONTROL AND THE STATE OF THE ST
J.	CENERAL ELECTRIC CO-COM	reparaments and of the interferons of the contribution of the cont
1 1	Byldend Option Cath	THE TAX TO A
ş		Companymental statements of the forest and companyments of the company of the companyments of the companym
1 1	CENTRAL COD COLL FORESTY AND AND THE DAY	and in a which the fightest in a position of the fighter of the fightest interest and the fightest interest in the fighte
1	AIGUALDE LONG LONG THE TARK	TOTAL CONTRACTOR OF THE CONTRA
1	A PARTY OF THE PROPERTY OF THE	mayin a production of the contraction of the contra
! {	Uniderial Option: Cash	to the second of
1	Security landing CENZ	The second state of the se
4	CILETTE COMPANY MER EFF 1077/63 T	termination of the transfer of the property of
-	OLD#975-CU#742918109-PROCTOR-2	entral for facts of the fact o
	CAMPLE IN	the communication of the commu
ţ	The state of the s	TO THE THE RESIDENCE OF THE PARTY OF THE PAR
-	UNIGERA CORION CASH	The State of the S
1	title - 6 - 2 sekset gardetig modelsprom elstenholdden strockstelsprom tip	er par paried kinner (en 1940, com National Production de particular des productions de la company de particular de la company de particular de la company d
1 ]	THE PROPERTY OF THE PROPERTY O	The First Control of the Control of
l	The party of the p	OF THE RESERVENCE OF THE PROPERTY OF THE PROPE
1	CALITY (Annies Characters)	TOTAL OF THE STATE
	THE PARTY OF THE P	4. The manifest of the state of
-	distribution of the second contract of the second s	Control of the Contro
Mary	- Biridend-Option: Cash	en dem i ventrelle i nom om a la ne per en obstructivit en beneficien de productivit per en p
and the second	THE REPORT OF THE PROPERTY OF THE PERSON OF	The state of the s
-		despression between the proportion of the propor
Tree-man	Charles a construction of the construction of	Anterior of the Anterior of th
li	THE TAXABLE TO THE PROPERTY OF	Meteorophysika des
	Security Identifier H	Universe representative problem production of the contraction of the c
	INTEL CORP COM	to being all other control to the control of the co
-	Dividend Option: Cash	AMERICAN THE PROPERTY OF THE P
	SECURIO 10 FILL FOR THE PARTY OF THE PARTY O	A from the state of the state o
1	The second STATE OF THE STATE OF THE SECOND	Company and the property of th
raments.	Dadded Onton: Cach	
	THE PARTY OF THE P	THE PROPERTY OF THE PROPERTY O
	ACCOUNTS AND ACCOU	der Winderschaft generaliste, der
1	Frank CHES CORPORATION	THE PROPERTY OF THE PROPERTY O
	Dividend Collon, Cash	THE PARTY AND TH
*	Security Identifier - KSS	
-	The state of the s	
	Managements and in management being product that syndrome management from the contract of the syndrome management for the syndrome management	
- 44	A SA THAT I THE	

- Telephone	The representative manufacture of the control of th	THE RESERVE THE PROPERTY OF TH
Common Stocks.	Control of the contro	The state of the s
- Anna Anna Anna Anna Anna Anna Anna Ann	many the property of the second secon	COLUMN TO THE PROPERTY OF THE
design (designation)	Care and the contract of the c	THE PARTY OF THE P
Constitution of the same	CONTROL OF THE PROPERTY OF THE	Construction of the Constr
Committee on Contract	SECULTY IDENTIFIED ILY	ANY VIEW CONTRACTOR OF THE PROPERTY OF THE PRO
remark on demonstration	MEMC-ELECTRONIC MATERIALS-INC-COM	
a - the majoral behavior .	Dividend Ontion: Cash	The state of the s
- du Pical americana de		a contract for the second of t
want of the changes of the factor of	7	A VALUE OF Y AND THE PROPERTY OF THE PROPERTY
Approximate our formation is a few or an extension of the contract of the cont	₹.	0818180
with the character processes	٣.	and the state of t
ment accombine surprising pages	Security Identifier: NIDT	And the property and the property of the prope
The state of the s	MICROSOFT CORP. COM	2. 26. 00 mm. 1. 26. 00 mm. 1. 20. 00 mm. 1.
provent comparison		Annihitation and the second se
de confermental de la conferment		* prescription of an experience of the second secon
The Atlanta of Manager of	peculity identifier. Mari-	The state of the s
tare a 14 arminus y Au	7	6,275.00
	Dividend Option: Cast	a polici condensament para descriptiva
	Sacurity (daubifac., NOM.	Computer Other School S
Section 1	MULIUMAC PROBLEMS	a contract a presentation of the contract of t
and the same of th	THE PROPERTY OF THE PROPERTY O	The second secon
The state and the state of the	۲۱	in comment and an additional and additional additional and additional additional additional additional and additional addit
d to Supplication		A company of the comp
	MORGANISTANIEVICOM	TO SELECTION OF THE PARTY OF TH
	Desident Outside Call	Annual An
	Distriction Objects and the second of the se	Address of the contraction of th
	Security Identified, MIND.	temporal problems (press) and the second of
TH 4000	MOTOROITAINC	
	Dwidend Cathon Cach	A CONTRACTOR OF THE PARTY OF TH
	County Manufacture 1800	a company of the speciment of the specim
	- John Spirite Spirit	a consideration of the constitution of the con
· · · · · · · · · · · · · · · · · · ·	Prize INC COM	and the second s
	Dividend Option, Cash	property of the state of the st
	Security Identifier. Pre	A common interpretation of the state of the
	OUAL COMM-INC	on the second se
1 . 2 . 4	Canada California	Complication of the contract o
	Comment of the second s	consistent Advisor Complete and a set of the sequence on a
to the designation of the second seco	Security (generally, Good)	ten in terry was impressed in a service of an experimental physiological
	KUCKWEL AUTOMATION INC COM	
4 characters	FORMERLY ROCKWELL INTE CORP	The state of the s
	Dividend Option: Cash	the figure of the first of the second opening and the second opening of the second opening opening of the second opening ope
a to the segment/frame	Security destifiac ROX	The state of the s
* Manufacture	ROPER INDUSTRIES INC. NEW COM	THE COLUMN TWO IS NOT THE PROPERTY OF THE PROP
	Daidend-Sation Cach	The second secon
	Constitution DOD	the reservoir definition of
	Jecombine Contraction of the Con	Control of
	STATION CASINOS INC COM	4.977.00
	Uwidend-Option: Cash	Character actual contemporaries as a second
	Security Identifier, STN	The second secon
	patenaria:	
· · · · · · · · · · · · · · · · · · ·	a stylenom	
· · · · · · · · · · · · · · · · · · ·	to the first analysis of the	

,	Appendig and a specific to the state of the
	Production personal name of the same
	(Continued of the second of th
THAT WADNED INC NEW COM	mandatastican) decomple
THE PROPERTY OF THE PARTY OF TH	ANY
Jividend-Option: Cash	a en extensión estados que estados que en estados en es
The state of the s	And the first of the conditional activities and additional activities and the first an
ecunity to an uner twy	the second secon
INITEDUES THE COURT INC COM	Appellacements and a second second as
HOL AND TOWN THE PROPERTY OF	operation and an analysis of an appropriate and ap
Jividend-Option: Cash	amplication colored are make print calcange in
acumbi Mantifice (18)11	de la description de la configuración de la co
county tuestainer. Older	special attention of professional designation of the second secon
WALGREEN CO	Any the first the detailed founds to the control and the state of the
The state of the s	in all the special sections of the section of the later properties of the section of the section of
AVIGERIA-CIPHORI, CASA	and the second department of the second seco
Committee MAC	Section in the contract of the
,	and of the same of
WHOLE FOODS MKT INC	THE STREET WAS THE STREET STREET STREET
	principal distribution of a manifest to the contract of the contract of the contract of
SECURITY CONTROL CONTROL	the a tent of the
ecunty Idenuffer WENT	The approximation of the second secon
Common or company of the common of the commo	5.0
	C CO

STLOGIA

and the second of the second o

ORANGE CONTRACTOR OF THE PROPERTY OF THE PROPE

## 51

### SCHEDULE B

1.	Residence on Clawson Street, Houston, Harris County, Texas	\$350,000
2.	65 acres with barn, well on Clay Creek Road, Washington County, Texas	280,000
3.	154 acres with mobile home, barn near Moulton, Lavaca County, Texas	400,000
4.	House on Zora, Houston, Harris County, Texas	130,000
5.	Weekend home on Jolly Roger, Jamaica Beach, Texas	450,000
6.	16 vacant lots, Mathis, Texas	1,200
7.	Fractional royalty/mineral interests near Mathis, Texas	500
8.	1/3 interest in 4.11 acres in Mathis, Texas	35,000

Senator CORNYN. Thank you, Ms. Dinkins, and thank you for introducing the other members of the Board who are here with us, and welcome.

Mr. Raul, we will now turn to you for any opening comments you would like to make.

# STATEMENT OF ALAN CHARLES RAUL, NOMINEE TO BE VICE CHAIRMAN OF THE PRIVACY AND CIVIL LIBERTIES OVER-SIGHT BOARD

Mr. RAUL. Mr. Chairman, thank you for your kind introduction earlier.

It is a great honor and responsibility to appear before this Committee as President George W. Bush's nominee to serve as Vice Chairman of the Privacy and Civil Liberties Oversight Board. I am humbled and inspired that the President has asked me to help our Nation maintain its constitutional soul in the process of defending itself and ultimately vanquishing enemies who have sworn to do us brutal harm. This mission is surely one of the most important and challenging roles a lawyer in our country could be asked to undertake.

If I am confirmed it will be a special privilege to embark upon this initiative with such distinguished, experienced and independent-minded colleagues as Carol Dinkins, Ted Olsen, Lanny Davis and Frank Taylor. My prospective fellow Board members are as talented and patriotic as any group with whom one could hope to work. I look forward to sharing responsibilities, efforts and objectives with them.

I am under no illusion that we can or should please everyone with the work of the Board. As embodied in the statute establishing the Privacy and Civil Liberties Oversight Board, our advisory and oversight obligations reflect a certain tension between protecting the precious liberties that are vital to our way of life, and acknowledging the additional powers the Federal Government may need to conduct the war on terrorism.

While I recognize that we may not please all sides all the time, I am certain that I and the other members of the Board will discharge our specified legal duties honestly and conscientiously. Specifically, we will be dedicated to ensuring that privacy and civil liberties implications and concerns are identified, understood, communicated, and appropriately considered as the executive branch develops and implements policies and practices to fight the war against terrorism.

To that end, if confirmed, I will make the personal commitment to assure that the views of the Privacy and Civil Liberties Oversight Board are informed and credited within the executive branch, and useful to the President and the relevant department and agency heads. We will also report candidly to Congress, as required by law, and consult meaningfully with civil libertarians and other patriots inside and outside of Government, who are interested in sharing their views, suggestions and concerns with us.

In the first and final analysis, if confirmed, I, and the other members of the Board I am sure, will be governed by the opening text in our great Constitution, where the people established our noble system of Government to, quote, "ensure domestic tranquility, provide for the common defense," and most germane for our Board, "secure the blessings of liberty to ourselves and our posterity."

Thank you for honoring me with your consideration of my nomination.

nation.

[The biographical information of Mr. Raul follows.]

#### I. BIOGRAPHICAL INFORMATION (PUBLIC)

1. Full name (include any former names used.)

Alan Charles Raul

2. Address: List current place of residence and office address(es.)

Sidley Austin Brown & Wood LLP 1501 K Street NW Washington, DC 20005

3. Date and place of birth.

September 9, 1954 New York, NY

4. <u>Marital Status</u>: (include maiden name of wife, or husband's name). List spouse's occupation, employer's name and business address(es).

Mary Tinsley Raul (nee Tinsley) Currently works at home

- Education: List each college and law school you have attended, including dates of attendance, degrees received, and dates degrees were granted.
  - Harvard College, 1972-1975, A.B. 1975 Magna Cum Laude
  - Harvard University, Kennedy School of Government, 1975-1977, M.P.A. 1977
  - Columbia University School of Law, 1977-1978
  - Yale Law School, 1978-1980, J.D. 1980
- 6. Employment Record: List (by year) all business or professional corporations, companies, firms, or other enterprises, partnerships, institutions and organizations, nonprofit or otherwise, including firms, with which you were connected as an officer, director, partner, proprietor, or employee since graduation from college.
  - Summer jobs during College and Law School (no specific data available)
  - U.S Government: Law Clerk, US Court of Appeals for the D.C., Hon. Malcolm R.

#### Alan Charles Raul

October 21, 2005

Wilkey, 1980-1981

- Debevoise & Plimpton, 1981-1986
- U.S. Government
  - o White House, 1986-1988
  - o Office of Management and Budget, 1988-1989
  - o U.S. Department of Agriculture, 1989-1993
- Beveridge & Diamond PC, 1993-1997
- Sidley Austin Brown & Wood LLP (previously Sidley & Austin), 1997-present
- Military Service: Have you had any military service: If so, give particulars, including the dates, branch of service, rank or rate, serial number and type of discharge received.

#### None

- Honors and Awards: List any scholarships, fellowships, honorary degrees, and honorary society memberships that you believe would be of interest to the Committee.
- Bar Associations: List all bar associations, legal or judicial-related committees or conferences of which you are or have been a member and give the titles and dates of any offices which you have held in such groups.
  - American Bar Association member since approximately 1980; I have served as a
    member of the Government Council of the Sections of International Law
    (approximately 1994-1997) and Administrative Law (2004-2005); I also served as
    an appointed member of the ABA's Standing Committee on Election Law
    (approximately 1996-1998).
  - Federalist Society member since approximately 1987; I have served as Chair of the Environmental Practice Group (approximately 1995-1998); Member of the National Practitioners Council (approximately 2000-present); DC Chapter Steering Committee (approximately 1997).
  - Atlantic Legal Foundation member of Advisory Council since approximately 2002 through the present.
  - <u>Conferences</u> I attend and/or speak at numerous CLE and other conferences every year. Not sure what further information would be useful, but I would be happy to elaborate as necessary or appropriate.
- 10. Other Memberships: List all organizations to which you belong that are active in

lobbying before public bodies. Please list all other organizations to which you belong.

- American Heart Association Member of Washington DC-area board of directors (2003-present; prior service as board member in 1990s).
- Council on Foreign Relations Member since approximately 1995 through present.
- Republican National Lawyers Association Member since 2005 through present.
- DC Bar Association Member since approximately 1982 through present.
- Progress and Freedom Foundation Adjunct Fellow (approximately 2000-2002).
- Social Clubs:
  - o Fly Club, Cambridge MA
  - o Harvard Club of New York City
  - o Metropolitan Club of Washington DC
  - o Chevy Chase Club of Maryland
  - o Siasconset Casino, Nantucket, MA.
- 11. Court Admission: List all courts in which you have been admitted to practice, with dates of admission and lapses if any such memberships lapsed. Please explain the reason for any lapse of membership. Give the same information for administrative bodies which require special admission to practice.
  - New York 1982
  - District of Columbia 1982
  - U.S. Court of Appeals for the D.C. Circuit 1982
  - U.S. District Court for D.C. 1986
  - U.S. Supreme Court 1988
  - U.S. District Court for Southern District of N.Y. 2000

[dates for the following not readily available]

- U.S. Court of Appeals, 10th Circuit
- · U.S. Court of Appeals, 11th Circuit
- U.S. Court of Appeals, 4th Circuit
- U.S. Court of Appeals, 9th Circuit
- U.S. Court of Appeals, Federal Circuit
- U.S. Court of Federal Claims
- · U.S. Court of International Trade
- Pro Hac Vice Admissions to various courts from time to time.
- 12. <u>Published Writings</u>: List the titles, publishers, and dates of books, articles, reports,

#### Alan Charles Raul

October 21, 2005

or other published material you have written or edited. Please supply one copy of all published material not readily available to the Committee. Also, please supply a copy of all speeches by you on issues involving constitutional law or legal policy. If there were press reports about the speech, and they are readily available to you, please supply them.

I am the author of "Privacy and the Digital State: Balancing Public Information and Personal Privacy" (Kluwer Academic Publishers 2001). I have provided a copy of the book for the Committee.

I have written numerous articles, alerts and speeches. Attached are printouts of Westlaw searches for articles specifying me as author. I have also attached a list of articles and relatively recent congressional testimony that has been maintained by my secretary, and updated from time to time. This list is not as comprehensive as the Westlaw search results, and would not generally include "practice" and CLE-type articles.

I would be happy to provide copies of any material of interest to the Committee. (I have provided copies of my congressional testimony on anti-spam legislation, presidential pardons, and the non-delegation doctrine. I believe my opinion pieces in the mainstream media are readily available, but I would be happy to provide copies if the Committee would like.)

I do not have any organized collection of speeches, most of which would be in the nature of CLE presentations.

13. <u>Health</u>: What is the present state of your health? List the date of your last physical examination.

My health is good. My last physical was in 2004.

- 14. <u>Public Office</u>: State (chronologically) any public offices you have held, other than judicial offices, including the terms of service and whether such positions were elected or appointed. State (chronologically) any unsuccessful candidacies for elective public office.
  - Law Clerk to U.S. Circuit Judge (1980-1981) (appointed)
  - Associate Counsel to the President (1986-1988) (appointed)
  - General Counsel, Office of Management and Budget (1988-1989) (appointed)
  - General Counsel, U.S. Department of Agriculture (1989-1993) (appointed)

#### 15. Legal Career:

- Describe chronologically your law practice and experience after graduation from law school including:
  - whether you served as clerk to a judge, and if so, the name of the judge, the court, and the dates of the period you were a clerk:

Law Clerk to Judge Malcolm R. Wilkey, U.S. Court of Appeals for the D.C. Circuit, 1980-1981.

whether you practiced alone, and if so, the addresses and dates:

#### Not applicable

- the dates, names and addresses of law firms or offices, companies or governmental agencies with which you have been connected, and the nature of your connection with each;
- Debevoise & Plimpton, New York, NY, Associate, 1981-1986
- White House, Washington, DC, Associate Counsel to the President, 1986-1988
- Office of Management and Budget, Washington, DC, General Counsel, 1988-1989
- U.S. Department of Agriculture, Washington, DC, General Counsel, 1989-1993
- Beveridge & Diamond, Washington, DC, Managing Director, 1993-1997
- Sidley Austin Brown & Wood LLP (and Sidley & Austin), Washington, DC, Partner, 1997-present
  - b. 1: What has been the general character of your law practice, dividing it into periods with dates if its character has changed over the years?

Practice involves litigation, regulatory counseling and corporate compliance. Issues focused on include: administrative law, constitutional law, environmental law, food safety, international trade, agriculture regulation, securities law issues, trademark, copyright, Internet law, privacy, international arbitration, appellate litigation, freedom of information.

 Describe your typical former clients, and mention the areas, if any, in which you have specialized.

#### Alan Charles Raul

October 21, 2005

Typical current and former clients: AT&T, Raytheon, Government of Peru, Aramark, Tyson Foods, Booth Eye Care and Laser Center, Hoffman-LaRoche, Schering Plough, Bank of New York, Costco, Sierra Pacific Power, Microsoft, Allergan, Mettler Toledo, Recording Industry Association, Business Roundtable, Organization for International Investment, TWE Trustee, Rep. Thomas Bliley and Sen. Hatch, Rep. Donald Manzullo.

Issues described in prior response immediately above.

Did you appear in court frequently, occasionally, or not at all?
 If the frequency of your appearances in court varied, describe each such variance, giving dates.

I appear in court occasionally. Typically: motions and oral arguments, and appellate arguments.

1. What percentage of these appearances was in:

(a) federal court;

65%

(b) state courts of record;

10%

(c) other courts.

25% (ICSID arbitration; WIPO arbitrations)

3. What percentage of your litigation was:

(a) civil:

100%

(b) criminal.

0%

 State the number of cases in courts of record you tried to verdict or judgment (rather than settled), indicating whether you were sole counsel, chief counsel, or associate counsel.

One case tried to a verdict; chief counsel.

5.

What percentage of these trials was:

(a) jury;

100%

(b) non-jury.

- 16. <u>Litigation</u>: Describe the ten most significant litigated matters which you personally handled. Give the citations, if the cases were reported, and the docket number and date if unreported. Give a capsule summary of the substance of each case. Identify the party or parties whom you represented; describe in detail the nature of your participation in the litigation and the final disposition of the case. Also state as to each case:
  - (a) the date of representation;
  - (b) the name of the court and the name of the judge or judges before whom the case was litigated; and
  - (c) the individual name, addresses, and telephone numbers of cocounsel and of principal counsel for each of the other parties.

[following are brief summaries; I can provide more detail and information if required, including contact data for opposing counsel where available]

Duke Power v. Peru, international arbitration under ICSID (appointed international arbitrators), 2005; international investment dispute involving tax and jurisdictional issues; I handled oral arguments and witness examinations and cross-examinations and significant briefing; decision pending.

Boothe v. Morikawa, Texas state court, Collin County (Judge Henderson), 2004-2005; Internet defamation and harassment suit; I handled TRO motion and significant briefing; TRO and permanent injunction granted.

AT&T v. Sprint, SDNY (Judge Cote), 2002-2004; unfair competition, trademark infringement, and FCC violations lawsuit; I handled substantial discovery, briefing, mediation, court conferences, and settlement negotiations; favorable settlement reached.

Retail Services, Inc. v. Freebies Publishing, EDVA (Judge Brinkerna), 2002-2004; trademark infringement and Anticybersquatting Consumer Protection Act litigation; I handled substantial discovery, summary judgment briefing and oral argument, and Fourth Circuit argument and briefing; favorable decisions rendered in district and appellate courts; 247 F.Supp.2d 822 (E.D.V.A. Feb 27, 2003); 364 F.3d 535 (4th Cir. 2004).

"Grokster" litigation, US Supreme Court, 2005; vicarious or contributory copyright infringement; I was lead partner for Sidley drafting amicus brief in support of recording and motion picture industry; Supreme Court ruled for industry in MGM et al. v. Grokster (2005).

Domain Name Arbitrations, World Intellectual Property Organization, 2000-present;

#### Alan Charles Raul

October 21, 2005

domain name cybersquatting and trademark infringement litigation; I have been lead counsel in briefing approximately 40 WIPO arbitrations; successful panel decisions obtained in nearly all proceedings.

AT&T v. AT-Time, EDVA (Judge Brinkema), 2002-2003; cybersquatting and trademark infringement under the Anticybersquatting Consumer Protection Act and Lanham Act; I handled briefing and oral arguments; permanent injunction and order transferring domain name granted.

Browner v. American Trucking Associations, DC Circuit and US Supreme Court, 1999-2001; issue involved whether EPA Clean Air Act rules violated the constitutional doctrine of non-delegation of legislative powers; I was the lead attorney briefing the non-delegation issue in the Court of Appeals (on behalf of amici Sen. Hatch and Congressman Bliley), and also submitted an amicus brief in the Supreme Court; the Court of Appeals issued a favorable decision that was reversed by the Supreme Court.

Idaho Conservation League v. Mumma, Ninth Circuit, 1992; litigation involved NEPA and APA issues regarding judicial review of USDA Forest Service forest management plans; I handled the briefing and oral argument in the Ninth Circuit; the Ninth Circuit granted judicial review but ruled for my client on the merits of the NEPA claim; 956 F.2d 1508 (9th Cir. 1992).

Bernardi v. Yeutter, NDCA (Judge Conti), 1991-1992; employment discrimination litigation; I handled significant, contentious negotiations resulting in a new, more feasible consent decree being entered.

Exxon Valdez, Natural Resource Damage Assessment, 1989-1993; I personally and substantially represented one of the Natural Resource Trustees (National Forests) in connection with remediation and recovery of natural resource damages in Prince William Sound; a one billion dollar NRD settlement was achieved.

17. <u>Legal Activities</u>: Describe the most significant legal activities you have pursued, including significant litigation which did not progress to trial or legal matters that did not involve litigation. Describe the nature of your participation in this question, please omit any information protected by the attorney-client privilege (unless the privilege has been waived).

The above eleven representations fairly describe the nature of my varying practice over the years. In addition to these litigations, I have submitted numerous amicus briefs in the U.S. Supreme Court and various Courts of Appeals, typically but not always involving issues of administrative law.

I also have a very active practice advising corporations on US and international privacy and data protection compliance programs, and information security issues. I coordinate Sidley Austin's Information Law and Privacy Practice.

I advise clients on food safety compliance and crisis matters, involving recalls and other regulatory issues.

# Alan Charles Raul October 21, 2005 II. FINANCIAL DATA AND CONFLICT OF INTEREST (PUBLIC)

List sources, amounts and dates of all anticipated receipts from deferred income
arrangements, stock, options, uncompleted contracts and other future benefits
which you expect to derive from previous business relationships, professional
services, firm memberships, former employers, clients, or customers. Please
describe the arrangements you have made to be compensated in the future for any
financial or business interest.

The position for which I have been nominated is part-time and, if confirmed, I will remain a partner of my firm. Accordingly, I understand this question not to be applicable.

Explain how you will resolve any potential conflict of interest, including the
procedure you will follow in determining these areas of concern. Identify the
categories of litigation and financial arrangements that are likely to present
potential conflicts-of-interest during your initial service in the position to which
you have been nominated.

If confirmed, I will consult with the designated White House ethics counsel, as well as my firm's ethics partner to avoid any conflict of interest. I will also ensure that I do not represent or receive profits from representation of foreign governments during my tenure. In view of the advisory and oversight nature of the Privacy and Civil Liberties Oversight Board, and the fact the Board's subject matter concerns the Government's activities to fight terrorism, I believe that the likelihood of conflicts with my representations or my firm's corporate clients is limited. In addition, I believe that as a general matter it unlikely that actual matters involving specific parties will come before the Board. If any matters come before the Board that could reasonably be viewed as posing a conflict with respect to me, my firm or client matters my firm is involved in, I will err on the side of recusing myself from any participation in Board decision-making.

 Do you have any plans, commitments, or agreements to pursue outside employment, with or without compensation, during your service in the position to which you have been nominated? If so, explain.

Not applicable in light of the nature of the position in question.

4. List sources and amounts of all income received during the calendar year preceding your nomination and for the current calendar year, including all salaries, fees, dividends, interest, gifts, rents, royalties, patents, honoraria, and other items exceeding \$500 or more. (If you prefer to do so, copies of the financial disclosure

report, required by the Ethics in Government Act of 1978, may be substituted here.)

My Form SF 278 is provided.

- Please complete the attached financial net worth statement in detail (add schedules as called for).
- 6. Have you ever held a position or played a role in a political campaign? If so, please identify the particulars of the campaign, including the candidate, dates of the campaign, your title and responsibilities.

I served briefly and minimally as a legal consultant to the 1984 Reagan-Bush campaign in the State of New York. I also served as general counsel to James C. Miller III in his 1994 and 1996 campaigns for the Republican nomination for U.S. Senate in Virginia.

#### III. GENERAL (PUBLIC)

An ethical consideration under Canon 2 of the American Bar Association's Code
of Professional Responsibility calls for "every lawyer, regardless of professional
prominence or professional workload, to find some time to participate in serving
the disadvantaged." Describe what you have done to fulfill these responsibilities,
listing specific instances and the amount of time devoted to each.

I understand that the following provisions are or may be applicable to my professional responsibilities, and I believe I practice in satisfaction of them:

#### DC Rule 6.1 — Pro Bono Publico Service

A lawyer should participate in serving those persons, or groups of persons, who are unable to pay all or a portion of reasonable attorney's fees or who are otherwise unable to obtain counsel. A lawyer may discharge this responsibility by providing professional services at no fee, or at a substantially reduced fee, to persons and groups who are unable to afford or obtain counsel, or by active participation in the work of organizations that provide legal services to them. When personal representation is not feasible, a lawyer may discharge this responsibility by providing financial support for organizations that provide legal representation to those unable to obtain counsel.

\* \* \*

NY EC 2-25 A lawyer has an obligation to render public interest and pro bono legal service. A lawyer may fulfill this responsibility by providing professional services at no fee or at a reduced fee to individuals of limited financial means or to public service or charitable groups or organizations, or by participation in programs and organizations specifically designed to increase the availability of legal services. In addition, lawyers or law firms are encouraged to supplement this responsibility through the financial and other support of organizations that provide legal services to persons of limited means.

I satisfy these professional responsibilities through a number of substantial activities and personal commitments.

I serve on the Board of the American Heart Association, and as co-founder and Chair of the Lawyers Have Heart event to benefit the American Heart Association. The proceeds from these activities are beneficial to the disadvantaged and minorities. We have specifically designed and promoted this event as an important opportunity for members of the legal community in Washington DC to serve the public interest. I have been

involved with the American Heart Association for over 15 years, and I dedicate approximately 50-75 hours per year to this cause as well as significant financial support.

With my wife, I am active in supporting the Children's Law Center, which provides legal services to disadvantaged children and families in Washington.

I have provided pro bono services to the Washington Legal Foundation, Members of Congress, a disabled veteran in the Federal Circuit, and an under-privileged family in a business dispute.

I serve on the Advisory Council for the Atlantic Legal Foundation, a public interest law firm that litigates cases on a pro bono basis. I dedicate approximately 50 hours per year to this Foundation.

2. Do you currently belong, or have you belonged, to any organization which discriminates on the basis of race, sex, or religion - through either formal membership requirements or the practical implementation of membership policies? If so, list, with dates of membership. What you have done to try to change these policies.

I do not and have not belonged to any discriminatory organization. My undergraduate college social club (analogous to a fraternity), the Fly Club, was and is all male. My daughter attends and I contribute to a school for girls (National Cathedral School), and one of my sons attends and I contribute to a school for boys (Landon School).

<u>AFFIDAVIT</u>

I, Alan Charles Raul, do swear that the information provided in this statement is, to the best of my knowledge, true and accurate.

(NAME)

KHIN BRODY NOTARY PUBLIC District of Columbia My Commission Expires May 31, 2006

#### FINANCIAL STATEMENT

#### NET WORTH

Provide a complete, current financial net worth statement which itemizes in detail all assets (including bank accounts, real estate, securities, trusts, investments, and other financial holdings) all liabilities (including debts, mortgages, loans, and other financial obligations) of yourself, your spouse, and other immediate members of your household.

SEE ATTACHED NET WORTH STATEMENT PREPARED BY MERRILL LYNCH 5/24/2005 (Specific securities owned and liabilities owed – other than debt secured by principal residence – are reflected on the SF 278 provided with this questionnaire.) Mortgage on primary residence and home equity loan are secured by that residence are held by Merrill Lynch and serviced by PHH.

Changes from 5/24/2005 Net Worth Statement:

Approximately \$150,000 assets in Merrill Lynch 529 college funds held for 3 children Firm capital account equals \$210,000 asset (Held by Sidley Austin)

Cash on hand equals approximately \$25,000 (up from approximately \$15,000)(held by Merrill Lynch for investment)

Personal debt is now approximately \$150,000 (up from \$70,000 shown on ML statement) (Citibank revolving loans and Merrill Lynch home equity account)

Bills payable are approximately \$30,000 (Visa account fluctuating balance)

Net addition to net worth equals \$260,000 for total net worth of approximately \$2,450,000

ASSETS	:		LIABILITTES	;	
Cash on hand and in banks			Notes payable to banks-secured		
U.S. Government securities-add schedule			Notes payable to banks-unsecured		

### Alan Charles Raul

### October 21, 2005

Listed securities-add schedule	Notes payable to relatives			
Retirement accounts and college funds (529s)				
Unlisted securitiesadd schedule	Notes payable to others			
Firm capital account				
Accounts and notes receivable:	Accounts and bills due			
Due from relatives and friends	Unpaid income tax			
Due from others	Other unpaid tax and interest .			
Doubtful	Real estate mortgages payable-add schedule			
Real estate owned-add schedule	Chattel mortgages and other liens payable			
		1		- 1

	, ,		
Real estate mortgages receivable			Other debts-itemize:
Autos and other personal property			
Cash value-life insurance			
Other assets itemize:	·		
		100	
·			
			Total liabilities
			Net Worth
Total Assets			Total liabilities and net worth

### Alan Charles Raul

### October 21, 2005

CONTINGENT LIABILITIES		GENERAL INFORMATION		
As endorser, comaker or guarantor		Are any assets pledged? (Add schedule)	NO	
On leases or contracts		Are you a defendant in any suits or legal actions?	ИО	
Legal Claims		Have you ever taken bankruptcy?	ИО	
Provision for Federal Income Tax				
Other special debt				

#### Attachments

### NET WORTH STATEMENT PREPARED BY MERRILL LYNCH

Printouts of Westlaw searches for articles specifying ACR as author (comprehensive).

List of articles and relatively recent congressional testimony (partial).

Copies of ACR congressional testimony on anti-spam legislation, presidential pardons, and the non-delegation doctrine.

Privacy and the Digital State: Balancing Public Information and Personal Privacy (Kluwer Academic Publishers 2001)



### YOUR NET WORTH

\$2,250,000		
20,000		
100,000		
		\$2,370,000
\$327,942		
36,000		
590,117		
182,000		
	\$1,136,059	
\$13,489		
6,575		
	\$20,064	
		\$1,156,123
		\$3,526,123
\$1,250,000		
3,000		
70,000		
		\$1,323,000
th \$2,203,123	······································	
	\$327,942 36,000 590,117 182,000 \$13,489 6,575 \$1,250,000 3,000 70,000	20,000 100,000 \$327,942 36,000 590,117 182,000 \$1,136,059 \$13,489 6,575 \$20,064 \$1,250,000 3,000 70,000



The previous table shows your current financial position. Your net worth includes only the assets and liabilities you listed in your Financial Foundation Profile questionnaire and assumes all employee retirement benefits are fully vested. It does not include assets which you do not directly and personally control, such as defined benefit pension plans and trust funds from which you cannot withdraw principal.

Life insurance proceeds (face value) are not included because they are not available to you while you are alive.

Alan C. & Mary T. Raul 05/24/2005

NSN 7540-01-070-8444 OOE/Adoke Astrobut version 1:02 (31/01/2004

OGE Use Only

(Check box if comments are continued on the reverse side)

Supersedes Prior Editions, Which Cannot Be Used

Executive Branch Personnel PUBLIC FINANCIAL DISCLOSURE REPORT

Form Approved: OMB No. 3209 - 0001

Any Face for Late FILING
Any Face for Late FILING
His report and does so more than 30 days
after the date the report is required to be
filled, or, it as extention in any
filling or, that as extention is granted, more
than 30 days after the last day of the
filling oversion period, shall be subject
to a 5200 fee. Schedule A-The reporting period color income (BLOCK c) is the preceding calendar year and the current calendar year up to the date of filling. Value assets as of any date you choose that is within 31 days of the date of filling. Schedule C, Part I (Liabilities)—The reporting period is the preceding calendar year and the current calendar year up to any date you choose that is within 31 days of the date of filing. Reporting Periods
Icumbents Therefords
the preceding chemian Your every Part
If of Stehedie C and Part I of Schedule D
where you must also include the filling
year, up on the date your fill.
Schedule Us not stay and Termination Filers: The reporting period begins at the end of the period covered by your previous filing and ends at the date of termination. Part if of Schedule D is not applicable. Schedule C, Part II (Agreements or Arrangements)-Show any agreements or arrangements as of the date of filing. Schedule D.-The reporting period is the preceding two calendar years and the current calendar year up to the date of filing. Nominees, New Entrants and Candidates for President and Vice President: Agency Use Only Schedule B-Not applicable. Telaphone No. (Include Area Gode) 202-738-8477 alified Diversified Trust?

X No Agin C. (Chidaes)
Department or Agency (If Applicable)
Physoy and Olvil Liboriosi Dowistich Board 50/90/90 Date (Month, Day, Year) Date (Month, Day, Year) Check box if filing extension granted & indicate number of days ... Termination Filer First Name and Middle Initia New Entrant, Nominee, or Candidate Signature of Designated Agency Ribics Official/Reviewing Official Comments of Reviewing Officials (If additional space is required, use the reverse side of this sheet) Sante Continuation Committee Congressional Committee Considering Nomination Senate Continuation Committee on Homeistee Continuation Address (Number, Street, City, State, and 2IP Code) 1501 K ST NW Washington DC 20005: Title of Position(s) and Date(s) Iteld Partner (1997-present) Reporting Status (Check Appropriate Boxes) Last Name Title of Position Vice Chairman Office of Government Ethics Signature Use Oaly Raul Certification
I CERTIFY that the statements I have
made on this form and all quecked
schedules are true, complete and correct
to the best of my knowledge. stion(s) Held with the Federal vernment During the Preceding Months (If Not Same as Above) gency Ethics Official's Opinion Position for Which Filing Reporting Individual's Name Location of Present Office (or forwarding address) Other Review (if desired by agency)

Reporting Individual's Name Raul, Alan C. (Charles)						1		<b>"</b>	SCHEDULE	出	Ā	러		4		1	ľ		- 1	- 1	- 1		1			Page Number	of <b>8</b>
Assets and Income	at a	Valuation of Assets at close of reporting period	lua	er i	Valuation of Assets close of reporting peri	As	per	8					<b>BB</b>	eck	ed,	20	oth oth	nd er e	l i i	n si y	12 8	ž g	in	B B G	k C	In come: type and amount, If "None (or less than \$201)" is checked, no other entry is needed in Block C for that item.	1)" is em.
BLOCK A			į	BLO	BLOCK B														32	BLOCK C	U						
For you, your spouse, and dependent children,	ő Nij	e elim	4 41	2017	1,12			1969	707			(" al	_	Type	ě						٧	Amount	un	بد ا			
And of the control of	21'001 - 212'000 "Nobel (o. 1628 fush: 21'001)	000 oss 100 cts	250,001 - 5100,000	2520,001 - \$500,000 	000,000,12,100,002	Over \$1,000,000*	21,000,001, 45,000,000	000,000,02\$ - 100,000,2\$	Over \$50,000,000	No. of the second section is the second	Excepted Trust	Onstitued Trust	Dividends	saliend beginst	Interest	Hone (or less than \$201)	HOUSE (OL 1622 (1/8t) 2501)	00\$'7\$ - 100'1\$	obo'statios's	55,001 - \$15,000	000'055-100'\$1\$	000'001\$ - 100'05\$	000,000,12 100,0017	Over \$1,000,000*	Over \$5,000,000	Other Income (Specify Type & Actual Amount)	Dare (Mo., Day, Yr.) Only if Honoraria
Central Airlines Common	r" :	N.,	.1175	20.57	À		**************************************		748-			11.72	×	藿	1	1,949,0	概整	×			7 (2 (1) %	۳	20.1	1 1 d.,	ļ.,		
formetow	'ānr	1		i in the second	T		1 12 E	125	- 222	F.,		ζς.	L	1303	Parent.	1	1 B	190	1778		10.00	l I	155	night.	! <del> </del>	Law Partmership Income \$130,000	    -
		44	17,574	l bă	E			¥¥.	1			r ng	L	i.	H.	ļ., ,	7	l Est	ķ	I	1,4	1	ļ.,	1	ļ.,		! ! !
BA Heartland 500 Index Fund				1.5F.	LX.		100	1	1	1,8		i-ac	l.	1665	-	1.3	1	1 1250	egge egge	1 -	1	-	17	100	1		    -
Sidiey Austin Brown & Wood Ilp (accrual relifement balance)	(1400) (1400)	AUTO C	19.7	×			~ 10 p. 400	- 45	Transfer Transfer	- 9274 19524	- 1450 - 4500	. 3		panen	<b></b> -		317	-					:: <u>::</u> ::::::::::::::::::::::::::::::::			actional accounting ribona 20K	
Vanguard Equity Fund	E E	Х	- 2	( 1977 - 1848				32		×	Š.		39.3		Li ure	, and the		100000		6		7 8		-		Swidends Swidends Delegen	the state of the s
SSgA S&P 500 index Fund			<u> </u>	×	- 0.0	ătie:		445	- Landing	×				transas inc	-		-	No.					100	2715 2721	ί, . -	no individue dividende aborted	11 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
Harbor Capital Appreciation			2	×		1	il .	erosinente	- dia tipo Tambio morphism	×	ğ				2000 2000 2000	- Ayın		- NO.		89. ) 79. ]	and the latest the lat	25.15		1,000		no imáviduel dividendel reported	
International Fund	i Zi	×	800 L							×				-	3 3.1	मान्यवस्थात		0			-	100		State	-	no individual dividende mocrae	
		i ingre	×	3.		1 10 5	-		्रीक्ष एक सम्बद्ध	×	4	Œ.		THINGS.		×	<u> </u>	\$ 44.75 44.75		. Jája	-	*	हेराच । क	<u> </u>		Service Services	

NASSELS 2 and Income   Assets 2 and Income	NASSETS and Income   Valuation of Assets	* &	Reporting individual's Name Raul, Aian C. (Charles)	SCHEDULE A continued (Use only if peeded)	E A Culy if no	continu seded)	eq					Fage Number 3 of	80
Note   100	NOCK A   N		Assets and income	Valuation of Assets at dose of reporting period		Income	type a	ind an	rount.	If "Non	e (or le	ss than \$	201)" is t item.
No.	NAS   Dearway   NAS   Dearwa	- 1	BLOCK A	BLOCK B				pa.	LOCK C				
State   Stat	WebDAD   W					Type	L		,	mom	ŗ		
NASOAO 100 TR Unit Seri 1  NPS Equity Porticito (Menni Lynch College)  Savings 220)  X  X  X  X  X  X  X  X  X  X  X  X  X	NASOACI 100 TR. Unit Seri 1  MF9 Equity Particle (Memil Lynch College) Savings 259) Shristol Myers Squilpb Citigroup inc Citigro			000'000'05\$ JAAO 000'000'55\$ -100'00'55 -000'000'57\$ -100'00'55 -000'000'51\$ -100'00'55 -000'000'51\$ -100'055 -000'005\$ -100'055 -000'005\$ -100'055 -000'005\$ -100'055 -000'055\$ -100'055	Excepted Trust	Representation Republics	None (or less than \$201)	\$1,001 - \$2,500	000'51\$ - 100'5\$	000'001\$ - 100'05\$	The state of the s		<del></del>
Dancord Trust Series 1"  WF9 Equip Portice (olivernii Lynch College) Serious 529) Shibut Myers Squilbb, Shibut Myers Squilbb, Shibut Myers Squilbb, N	Dancod Trust Series 1"  WF9 Equity Porticle (Mernil Lynch College)  Savings 2.59)  Bristo Myers Squilbd,  Cligroup inc  Digene Corp  Safeway Inc.  Safeway I	-	NASDAQ 100 TR Unit Ser. 1	X			2.23	M.,	7.1.		,		
Write Equip Porticle (Mermit Lynch College Savings 552)  British Myers Squilbb,  X  X  X  X  X  X  X  X  X  X  X  X  X	Write Equity Protetol (Mernil Lynch College) Savings 529) Britack Myers Squibb, Citigoup inc Citigoup inc Citigoup inc Capterna Plough Safeway inc.	~	Diamond Trust Series 1	A STATE OF THE STA				X:					
Sidenay Inc.  Schema Pough  Safeway Inc.  Schema Pough  Y  X  X  X  X  X  X  X  X  X  X  X  X	Sidework Squilbb.  Cliggoup inc.  Digene Corp.  Safeway Inc.  Safeway In	m.	MF9 Equity Portfolio (Mernil Lynch College Savings 529)	TOTAL STATE OF THE	77.7%			-					
Cliggoup ine Digene Corp Safernay Inc.  Safernay Prough Target Corp	Cliggoup ine  Digene Corp  Safeway Inc.  Safeway Inc.  Safeway Inc.  Safeway Inc.  Safeway Inc.  Safeway Inc.  N	,	Briskot Myers Squibb							100 V 300			
Safeway Inc. Schemag Plough Yes	Safeway Inc.  Safeway Inc.  Safeway Inc.  Safeway Inc.  Safeway Inc.  Safeway Inc.  X X X X X X X X X X X X X X X X X X X	S		×						- TOO	i i i i i i i i i i i i i i i i i i i	5125.2	
Safeway Inc.  Safeway Inc.  X  X  X  X  X  X  X  X  X  X  X  X  X	Schemay Inc.  Schemay Plough  Target Corp.  Target Corp.  Target Schema	9	Digene Com	×		×	×			og?	192	candidate sa	
Schemag Plough  X  X  X  X  X	Target Corp.  This category applies only if the asser/income is solely that of the flier's spouse or dependent children. If the asset/Income is other than only the flier with the appears or dependent children. If the asset/Income is other than of the	~		×		n and					negrenation		
Target Corp.	Target Corp.  This caregory applies only if the asser/uncome is solely that of the filer's spouse or dependent children. If the asser/Income is either that of the by the filer with the spouse or dependent children, mark the other higher categories of value, as appropriate.	16	Scherang Plough			×	×				Transfer		20 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
	This category applies only if the asser/income is solely that of the flier's spouse or dependent children. If the asset/Income is either that of the flier or jointly held by the flier with the spouse or dependent children, mark the other higher categories of value, as appropriate.			×		×	×	1,04 1,44 1 , 1		200	Hitus		

KE/Adobe Aerobat version 1.0.2 (11/01/2004)

Assets and Income   Asse	α	Raul, Alan C. (Charles)			1	]	- 1	l	1	(Use only if needed)	-	SS	[8]	(Use only if needed)	g l	9	3	_	: 1	. 1	- 1	- 1		- 1	- 1	- 1			10 10	4 of	· 60	San Salaha
The Part of the		Assets and Income		at	Clo	lua Se o	금말	000	As	2 2	go	1	-	1	1	10	D D	ked	E. E.	52	an an	E E	2 8	S nc	ed 1	o d	9 G	원청	SS	nan \$	(101)"	si 'i
1		BLOCK A	_	-			BĽ	Š															STO	X			- 1					
Sap   Sap				1-74	rá.	P-127	94. F	4 55		100 m	1.11	PP 1	mhilis	7 (3)4	311.		Ţ	þe						٩	ğ	unc	2					
Sidiley Cash Basince Pain jassel last attached X X X X X X X X X X X X X X X X X X X						POW LET C. D.A. I. M. L. M. MCNEW POR PARTIES AND THE		T		21'000'000'5\$ 2000'000'15		The state of the s			A 1 1 AND THE OWNER OF THE PARTY AND ADDRESS O	The state of the s	AND DESCRIPTION OF PERSONS ASSESSMENT ASSESSMENT ASSESSMENT ASSESSMENT ASSESSMENT ASSESSMENT ASSESSMENT ASSESS		and the same super leade ).						000'0015 - 100'05\$	and the state of t		000'000'S\$ . 100'000'T\$	Over \$5,000,000	Other income (Specify & Actual Annount		Date 6., Day, Yr.) mly if noraria
Siddey Cash Balance Plan lasse list ethached]  Outloom  Research in Motion  Siddey Austin Brown & Wood LLP  X  X  X  X  X  X  X  X  X  X  X  X  X		Time Warner Inc	5.4.1	×	2 100	1.0				Andreas	-		i	<u> </u>	- 11				- Water	×	- 10/4	-	-		गणामा	Contraction		THE RESE	- 4 -		1	
Research in Motion  Siddey Austin Brown & Vioca LLP  Siddey Austin Brown & Vioca LLP  X  X  X  X  X  X  X  X  X  X  X  X  X	N	Sidley Cash Balance Plan (assel list attached		a distance of the last of the	of contrast of the	A X	1			7 5	1	1	+					g	- Contractor	1		1		نسيست	N STATE OF THE PARTY OF THE PAR			- meyer	1	pode boot	- 11	7.00 7.00 7.00 7.00 7.00 7.00 7.00 7.00
Statey Austin Brown & Viccol LLP  X  X  X  X  X  X  X  X  X  X  X  X  X	m.	dualcomm			×	1 18051 ·	<u> </u>		TEAS.				-			×			end soem	×	atmangan.					3	MAN.	CHOOL PER				
Sidey Austin Brown & Voco LLP  X  Netrill Lynch Money Market  X  X  X  X  X  X  X  X  X  X  X  X  X	9 1		1 Mary	×	-	<u> </u>			iside :					1100				- 75		×				- 193	- Carl			dayare-sele	-		534	
Neimit Lynch Money Market  X  X  X  X  X  X  X  X  X  X  X  X  X	so T	Sidley Austin Brown & Wood LLP		/85k toxe	<del></del>					344,7108153		Carlina Const		and the same				¥ ,	a s "diditir		<b>-</b>		174 (2) (4) 1834 - 1				ŷm <sub>ag</sub>	ह्या काम घरन -	2 3 2	Autoelship 100mel 15	10 (A)	
S&P 500 Index Fund	φ.			×		14.45.			Parage .			NET PER	12		- 33	- 3	Augustus		ian y s	×	1	النميج بمسا			(C. S. C. C.	Sales in the last	y.:	ancidae,				
	7	S&P 500 Index Fund			C 1		un marine			nduskrasi		ricinitanie	<u> </u>	TOTAL PROPERTY.		diale		-			Y			<u> </u>		n nerion				iparais Tiedij	ang	- 14
	ec .		grande.		-		derestro		A.U	and the same	0.519898		GANCINA F		A-Propie	riili:		.e#9#3	20 E 2 * 05K		ARLES CONTROL	Gerrania Gerrania	Past-1	1 23.557 1 10.5561	3 444				2-14947		eregázia	T. Pere
	2 .									enessien.	- 1	arawaki.	-nemisir	-armonig				-4754	100	100	ANGENIE	-				1					Colena Sedan S	

Sidley Cash Balance Plan Assets

SIDLEY AUSTIN BROWN & WOOD

Equity Summettle
Large CaptionStanton
OHO US Quality Squidy Fund - UI
Small Capitationtion
Fromiss Sanial Cap George
Stylins Spacial Equilies Providelle
Subsent Comments Squiry

ChtO Inscendenal laws. Value III ChtO Esserging Markets Punt III Related Institution Squity

top Frands
AQR
Agriphings
Black Boar Orliners Fund
Carriny Yesh Orliners Fund
Carriny Yesh Orliners Fund
Carriny Has See See
Gallo Hand Senseny Offices Fund
Hajdhe Capital Ind. Ltd
Movemick Fund

tersative Equity
views Equity/Venture Capital
Advest Admini & Facific II
Advest Global Privers Equity III
Advest VIII
TA Associate DE
Each Capital Privers Equity III
Advest VIII
TA Associate DE
Each Capital Prod VIII LP
ECR I
Ecculum Eachyo I
Ecculum Capital Privers IV
Eachmant Eachyo I
Ecculum Capital Privers III
Forester Capital Privers III
Forester Capital Privers III
Forester Capital Privers II
Forester Capital Privers II
Forester Capital Privers II
Forester Capital Privers II
Forester Capital Privers III
FOCAS Capital Privers III
FOCAS VII
WCAS VIII
WCAS VIII
WCAS VIII
WCAS VIII
FOCAS VIIII
FOCAS VIIIII
FOCAS VIIII
FOCAS VIIIII
FOCAS VIIIIIII
FOCAS VIIIIIII
FO

TITTAL ASSETS

\(\text{GE/Adobe Acrobat version 1.0.2 (11/01/2004)}\)

avesticate c

SF 278 (Rev. 03/2000) 5 C.F.R. Part 2634 U.S. Office of Government Ethics

Do not complete Schedule B if you are a new entrant, nominee, or Vice Presidential or Presidential Candidate

Part II: Gifts, Reimbursements, and Travel Expenses
For you, your spouse and dependent children, report the source, a brief description, and the vitation of 1818 such as transportation, lodging, lood, or entertainment) received from one source ordaling more than \$160, and received from one source ordaling more than \$160, or entertainment) received from one source ordaling more than \$160, or conflicts analysis, it is helpful to indicate a basis for receipt, such as personal representance of expenses provided. Ixclude anything given to you by

None Ellipse, you and the nature of expenses provided. Ixclude anything given to you by COCOTO OS Value \$300 000'000'57 ŏ 000'000'571 100'000'57 Page Number 000'000'\$1 100'000'11 7000 00013 000'000'15 000'000'15 - 100'005\$ 000'0053 - 100'0575 - 100'0013 - 100'0013 - 100'053 - 100'513 Airline teket, hacel room & mesis incident to national conference 6/13/99 (parsonal activity unrelated to duty)

Leather defects (parsonal field)

Leather before the best of the field of This category applies only if the underlying asset is solely that of the filer's spouse or dependent children. If the underlying asset is either held by the filer or jointly held by the filer with the spouse or dependent children, use the other higher categories of value, as appropriate. 272 600 12 001 Date (Mo., Day, Yr.) Brief Description ecetand a SCHEDULE B None Do not report a transaction involving property used sulely as your personal residence, or a transaction solely between you, your spouse, or dependent child. Check the "Certificate of divestiture" block to indicate sales made pursuant to a certificate of divestiture from CGE. Examples Nat'l Assn. of Rock Collectors, NY, NY Frank Jones, '20 Francisco, CA Report any purchase, sale, or exchange by you, your spouse, or dependent children during the reporting period of any I real property, stocks, bonds, commodity futures, and other securities when the amount of the transaction exceeded \$1,000. Include transactions that resulted in a loss. Part I: Transactions Example | Central Airtines Common Reporting Individual's Name Raul, Alan C. (Charles)

SF 728 (Rev. 0.3/2000) 5 C.F.R. Part 2654 U.S. Office of Government Ethics

Reporting	Reporting Individual's Name							Pa-	Page Number	Į,		Γ
Raul, Alan	Raul, Alan C. (Charles)	SC	SCHEDULE (	U						6 of 8	8	÷
Part	Part I: Liabilities	a mortgage on your personal residence	None 🔄									
Report li	Report liabilities over \$10,000 owed to any one creditor at any time	unless it is rented out; loans secured by automobiles, household furniture		L.		Cate.	gory of A	Category of Amount or Value (x)	Value (x	_		П
during to your spo Check th during th	during the reporting period by you, your spouse, or dependent children. Check the highest amount owed during the reporting period. Exclude	or appliances; and liabilities owed to certain relatives listed in instructions. See instructions for revolving charge accounts.			000'0 - 100's - 100'0	00000	200'00 200'00 200'00 100'00	000'000'	100,000 100,000 000,000	100000	0'000'000 2'000'001	- 000,000,0
	Creditors (Name and Address)	Type of Liability	Incurred Rate	applicable		15	47:	1\$ 5\$		23 23	\$\$ ?\$	55
Evameles	First District Bank, Washington, DC	Mortgage on rental property, Delaware	1991 8%	25 yrs.	el la	1, 346						1.1
	John Jones, 123 JSt., Washington, DC	Promissory note	1999 10%	on demand	13		.intl	33		ici		
Chiba	Citibank, Washington, DC France, Description	eoil Mac	emind	1,0000	4-0 4-000	X		* 1	- 2	100		
2 MBNA	MBNA (closed)	credit line				X			CHOMBINE CHOMBINE		denismo de la composición de la composición de de la composición de la composición de de la composición de la composición de de la composición de la composi	
3 Ciliban	Citibank, Washington, DG	credit line	eura :		X						and.	4
											<u>ئىمىد -</u>	- 1
\$				789 387 289 387 247 387 247 387 247 37 247 37					134			90.0
with the	tegory appites only if the liability is sol e spouse or dependent children, mark t	This category applies only if the liability is solely that of the filer's spouse or dependent children. If the liability is that of the filter or a joint liability of the filter with the spouse or dependent children, mark the other higher categories, as appropriate.	en. If the liability is	hat of the filer	or a join	. Hability	of the file	z.				
Part	Part II: Agreements or Arrangements	Arrangements										
Report y employer tion of p	our agreements or arrangements i e benefit plan (e.g. pension, 401k, ayment by a former employer (ind	Report your agreements or arrangements for (1) confuning particlation in an employee benefit plan (e.g. pension, 401s, deferred compensation); (2) continuation of payment by a former employee (including severance payments); (3) leaves	of absence, and (4) future employment. See instructions regarding the reporting of negotiations for any of these arrangements or benefits.  Nose	(4) future en ns for any of	ployme these as	nt. See ir rangem	structio	ons rega cenefits.	rding t	he repo	ort- None	
	Status and Terc	Status and Terms of any Agreement or Arrangement				P2	Parties				Date	91
Example	Pursuant to partnership agreement, wi	Pussant to parinership agreement, 1971 receive lump sum payment of capital account & partnership share calculated on service performed through 1,700.	rtnership share	Doe Jones & Smith, Bometown, State	Smith, Bo	netown, St	aic				7/85	45
Continu	ung parthership, benefits and retirement	Continuing partnership, benefits and retirement plans with Sidey Austin Brown & Wood LLP		Sidley Austin Brown & Wood LEP, Washington, DC	Brown &	Woodle	P. Washi	ngton, O				Ğ.
2			A Sul									
-2 -22 -22							1					
4				2000 2000 2000 2000 2000 2000 2000 200	50000 50000 50000 50000	1000 1000 1000 1000						
- 148 - 1								5 Y	4			174
. 9												

SP 278 (Rev. 03/2000) 5 C.F.R. Part 2634 U.S. Office of Government Publics

Reporting Individual's Name Rauf, Alan C. (Charles)	SCHEDULE D	8	Page Number of Street
Part I: Positions Held Outside U.S. Government Report ary positions held during the applicable reporting period, whether compensated or not. Positions include but are not limited to those of an officer, director, trustee, general partner, proprietor, representative, employee, or consultant of any controlation, firm, partnership, or other business enterprise or any non-profit	검실	organization or educational institution. Exclude positions with religious, social, fraternal, or political entities and those solely of an honorary nature.	with religious, onorary None
Organization (Name and Address)	Type of Organization	Position Held	Ye.) T
Examples Professional Collections, NY, NY	Nurprofit education	President	6/92 Present
Sidiay Austin Brown & Wood LLP, Washington, DC.	Law Firm	Partner Committee Committe	
2 American Heart Association, Nations Capital, Regional, Washington DC		Board Weinber	D4/2002 present
3 Atlantic Legal Foundation, New York NY	Non-year	Advisory Council Member	01/2002 present
4 Anerican Bar Association, Section of Admin Levi & Prec. Chicago IL	Non-room	Council Member	D4/2004
Federalist Society Washington, DC	Non-Profit	Nat'l Practitioners Council	01/2000 present
6 Council on Foreign Relations	Non-Profit	Wember	01/1990 present
Part II: Compensation in Excess of \$5,000 Paid by One Source Report sources of more than \$5,000 compensation received by you or your non-profit organization when	\$5,000 Paid by One Source	Do not complete this part if you are an incumbent. Termination Filer, or Vice when Presidential Candidate.	part if you are an on Filer, or Vice ential Candidate.
business affiliation for services provided directly by you during any one year of the reporting period. This includes the names of clients and customers of any corporation, firm, partnership, or other business enterprise, or any other		you directly provided the services generating a fee or payment of more than \$5,000. You need not report the U.S. Government as a source.	ou None 🔠
Source (Name and Address)		Brief Description of Ducies	
Examples   Doc Jones & Smith, Hometown, State	Legal services Legal services in connection with university construction		
Sidey Austin Brown & Wood LLP, Washington DC	seouvas tegėj		100
List of clients over \$5,000 Tollows	legal services (for all parties idontified below)	Ŷ.	Ballion Grades Grades Grades Grades Grades
3 Агатан. ATAT, BAnk of New York, Boothe Eye Care, Willem Boothe MD	OW.		
Borden Chemical, Canyon Partners, CDW, Church of Vesus Christ of Latter Day S	after Day S	Company of the Compan	
S Costco, Countrywide, Peru, Hoffman-La Roche, KPMG, Raytheon, Recording Indus	stipul jugins		
Relat Serv ces/Freebre Inc. Sara Lee, Schering Plough, Svotoda Collins	61		92

5 C.F.R. Part 2634 U.S. Office of Government Ethics					
Reporting Individual's Nanc Raul, Alan C. (Charles)		SCHEDULE D	P3	Page Number	2.2
Part I: Positions Held Outside U.S. Government Report any positions held during the applicable reporting period, whether compensated or not. Positions include but are not infinited to those of an officer, director, trustee general nature: monalism compensation of noncontrast of	Outside U.S. Govern pplicable reporting period, whether out limited for those of an officer, de presentative employee or consults	n a	organization or educational institution. Exclude positions with religious, social, fraternal, or political entities and those solely of an honorary	olth religious, morary	1 ,
any corporation, firm, partnership, or other business enterprise or any non-profit	other business enterprise or any no			None	
Organization (Name and Address)	and Address)	Type of Organization	Position Held	From (Mo., Yr.) To (Ma.,Yr.)	1, Yr.
Framples Nat'l Astn. of Rock Collectors, NY, NY		Non-profit education	President	6/92 Present	ř
Doe Junes & Smith, Ho					
2 Section 1					1 mag
					ates at
4 (1)					
\$					je je vid Luge V
9					
Part II: Compensation	in Excess of \$5,00	Paid	Do not complete this part if you are an Incumbent, Termination Filer, or Vice	part if you are a	9.
Report sources of more than \$5.000 compensation received by you or your business affiliation for services provided directly by you during any one year of the reporting period. This includes the names of clients and customers of any corporation, firm, partnership, or other business enterprise, or any other	mpensation received by you or you directly by you during any one or names of clients and customers of r business enterprise, or any other	·	8.6	ential Candidate ou None [	aП

Ligal services in connection with university contraction giá. TWE Holding Trusts, Tyson Foords, USA-ITA, Wahluke County, Watter E Smiths 100 Washington Legal Foundation, Donald A Manzulfo, Anheuser-Busch Alkins Numbonals, Organization for International Investment American Heart Association, Atlantic Legal Foundation

OCE/Adaba Acrobar version 1.0.2 (11/01/2004)

Prior Editions Cannot Be fised.

Senator CORNYN. Thank you, Mr. Raul, and thanks to you, Ms. Dinkins, for both bringing members of your family here with you. This is, I know, a proud moment for them as well.

Let me ask you, please, to stand so I can administer the oath to

both of you.

Do you swear that in your testimony before the Committee, you will tell the truth, the whole truth and nothing but the truth, so help you God?

Mr. Raul. I do. Ms. Dinkins. I do.

Senator CORNYN. Thank you. Please have a seat.

I guess one of the big challenges that this Board has is being a new board and being really not a lot of guidance, I guess, for exactly how you are supposed to carry out your functions. I would be interested in hearing from each of you how you intend to proceed, if only maybe in general terms right now, if you are confirmed to this position. How do you see getting started, Ms. Dinkins?

Ms. DINKINS. Thank you, Mr. Chairman. It will be quite a challenge given that the Board does not currently exist and it is brand new. As I said earlier, our first order of business will be to engage an Executive Director. We will then evaluate what other types of people we might need to staff the functioning of the Board, and seek additional resources from the various departments through

detailees, for example.

Once we have an Executive Director and office space, to speak very practically, then the Board will begin to identify who we would want to reach out to and speak with about what their views are regarding the things that the Board should be looking at and delving into. And we will use that to guide us in setting our agenda, and more importantly, within the agenda, to set priorities.

That's very general, but other than that, we'll be guided by what

is in our statutory mandate.

Senator CORNYN. Mr. Raul, do you have any other thoughts?

Mr. RAUL. Well, I agree with Ms. Dinkins that we will seek to reach out and be educated by the views of the people, both inside and outside the Government, the Executive Branch and in the Congress, to learn from people who have been following this issue and very concerned about it for a long time. So we'd like to hear from people who are interested in sharing their thoughts with us. Obviously, we'll convene as a Board, the five of us, to determine initial priorities and so on, but as Ms. Dinkins indicated, finding an Executive Director, getting the logistics of getting an organization in place will be, will have to be a top priority.

Senator CORNYN. As I said, the statute is not really expansive about exactly how you are supposed to function, but it does say that the role of the Board is to advise counsel and oversee the Executive Department's development and implementation of policy, including reviewing proposed regulations and executive branch policies in the area of terrorism prevention and so forth, reviewing the implementation of laws, regulations and executive branch policies related to terrorism prevention, including the implementation of information-sharing guidelines under Sections (d) and (f) of Section 1016 of the National Intelligence Reform Act, and then to advise the President and department and agency heads, to ensure

that privacy and civil liberties are appropriately considered in the development and implementation of such regulations and Executive Branch policies.

It is my impression that some people feel that this is a zero-sum game, Ms. Dinkins, between national security and terrorism prevention on one hand, and civil liberties and privacy rights on an-

other. How do you see it?

Ms. DINKINS. Both of those are of fundamental importance to our way of life and to our future. We must protect the country from those who would destroy us and destroy our people and our culture, but on the other hand, we can't give up or give short shrift to what makes this such a special Nation, and we must protect our privacy and our civil liberties.

And these are things that require careful balancing, things that require a great deal of back and forth to make sure that the tension is properly resolved so that we do not sacrifice our civil liberties while we are fighting those who wish to destroy us. I don't think that it's an easy tension, but it's one that we must grapple

with and we must come out on the right side of it.

Senator CORNYN. I know as we have debated the PATRIOT Act— I was not here when that was passed and signed by the President, but I have been here during the debate since that time, and aware of the fact that the PATRIOT Act has been condemned, I guess, by the resolution of, I think, over 300 different municipal governments. Now, it is a matter of curiosity to me why city councils and mayors would be passing resolutions condemning the PATRIOT Act, particularly in light of the fact that it has been so important, particularly in terms of information sharing, in terms of making sure that our intelligence and law enforcement authorities have the tools they need in order to root out terrorist activity, and to keep

I say that just because it has always struck me that this is an area where there is a lot of misinformation, you might even say disinformation, and perhaps the best thing you could say is it is an area where people just do not know s much as they probably would need to know in order to make good decisions about this balance.

I am curious, Mr. Raul, do you happen to know, will the Board be privy to classified information and be given an opportunity, in evaluating privacy and civil liberty concerns, to be able to weight that in the balance with concerns about threats?

Mr. RAUL. Yes, Mr. Chairman. The statute establishing the Board is very clear that the members of the Board are to be provided with security clearances, specifically for the purpose of allowing us, if confirmed, to have information that will let us balance these issues in an informed way. We need to have, and I believe the statute contemplates that we will have, access to information so that we can advise the President, department heads and agency heads, and make our report to Congress. And the statute says "in an unclassified fashion to the greatest extent possible," thereby contemplating that portions of it might remain classified.

But I believe that it was the intention in establishing the Board that we would have the clearances that are necessary and commensurate with the type of information that we will need to balance the issues between fighting the war on terrorism while ensuring that civil liberties concerns are considered as we do that.

Senator CORNYN. I think that is very important, because as our own history shows us, the more people feel threatened by whether it is terrorism or by enemies of this country, the more perhaps we are willing to accept in terms of loss of privacy rights. I think people do have to strike a balance, and that will be important information for you to have, I think, as you go through this job, and as you review these rules and regulations, and as you advise the President and other agencies.

I also think you could perform an important role for the President by, as you said, by reaching out to various organizations that do have concerns in these areas, and I think part of that is going to be not only listening to their concerns, but perhaps helping them to understand what the facts are because this is an area that can be very emotional, and sometimes disputes can be resolved by pointing out the facts or correcting misimpressions or misapprehensions about exactly what Congress and the Federal Government is about.

I know you will not be too surprised that I do not have a lot more for you, and actually it may turn out to be fortuitous that we do have votes now, but I think at this point what I will do is we are going to leave the record open so that any member of the Committee can ask any additional questions they may have of you in writing, and we will leave that record open until 5 p.m. on Tuesday, November the 15th, for that purpose.

What we are going to do, after a little consultation with staff here, we are going to recess the hearing, and we have two votes so it may be a few minutes, maybe 30 minutes or so, and then we will come back.

I am actually through with the questions I had of you, but Senator Feingold, I understand, will be coming, and either he will reconvene the hearing and ask those questions, or I will be back for that purpose.

But thank you for being understanding about our crazy schedule around here. Thank you for your willingness to serve.

We will recess the hearing at this time. [Recess from 2:56 p.m. until 3:32 p.m.]

Senator CORNYN. One thing I neglected to do is to give you each a chance to introduce your family members that are here with you. I had a chance to meet them informally, but, Ms. Dinkins, would you care to introduce your family for the record?

Ms. DINKINS. Yes, thank you so much. Mr. Chairman, may I please present my husband, Bob Brown.

Senator CORNYN. Congratulations, nice to see you.

Mr. Raul, I know you have several members of your family here with you.

Mr. RAUL. Yes, I have a nice cohort here. Thank you, Mr. Chairman.

I have my wife, Mary Tinsley Raul, and my daughter Caroline, my son, William, and my son, Alexander, and I also have my sister-in-law, Sarah Tinsley Demarest.

Senator CORNYN. That is great. Well, welcome to all of you, and thank you for being here and being so supportive of your spouse, and father and brother, excuse me.

and father and brother, excuse me.

Senator Feingold had said he wanted to come over and ask a few questions, but unfortunately, he is otherwise committed, so he is going to submit those questions in writing, like other members of the Committee. There may be additional questions that you will be asked to answer. Those will be submitted no later than 5 o'clock, next Tuesday.

With that, the hearing is adjourned.

[Whereupon, at 3:33 p.m., the Committee was adjourned.]

[Questions and answers and submissions for the record follow.]

### QUESTIONS AND ANSWERS

### Senator Dick Durbin Questions for Carol E. Dinkins Nominee to be Chairman of the Privacy and Civil Liberties Board

- 1. You are a Partner in a large law firm in Houston, which must consume a great deal of your time. The Board has substantial responsibilities, including ensuring that privacy and civil liberties concerns are appropriately considered in the Executive Branch's development and implementation of all counterterrorism-related laws, regulations, and policies.
- a. If confirmed, how much time do you estimate that you will spend per week on the Board's work?
- b. How often do you plan to travel to Washington in your capacity as Chairman?
- c. How often do expect Board members to meet?
- d. The Intelligence Reform law states that the Board Chairman may be full-time. You are going to be Chairman on a part-time basis. How do you plan to carry out the Board's broad statutory mandate on a part-time basis?

(I note that my response to this question tracks in certain respects my answer to a similar question posed by Senator Feingold.) I am honored to have been nominated to chair the Privacy and Civil Liberties Oversight Board, and, if confirmed, I am committed to doing whatever is needed to make it a success. I anticipate that that this will include a substantial commitment of my personal time, and I expect to travel to Washington, D.C. frequently to chair Board meetings and to attend to other Board business. The Board will collectively make a decision about how often we will meet, and I do not want to precommit the Board to a particular meeting schedule. However, it is my expectation that the Board will meet as often as necessary to fulfill its statutory mission.

While I and the other members of the Board will continue to meet our professional and business obligations in the private sector, I am convinced that the individuals the President has nominated or appointed have the experience and proven dedication to public service necessary to make the Board effective and influential. I do not believe that my part-time status will preclude the Board from effectively fulfilling its mission.

2. We are approaching the one-year anniversary of the passage of the Intelligence Reform Legislation and it is important that the Board begin its important work as soon as possible. What is your timeline for making the Board operational, including hiring an Executive Director and staff and securing office space?

I agree that it is critical that, after a Chair and Vice Chair are confirmed, the Board get up and running as quickly as possible. If confirmed, I would view the hiring of an executive director as the Board's first priority. My other initial priorities, as I noted in my response to a question from Senator Feingold, would be (i) to convene the Board for

the purpose of developing both a substantive agenda and internal procedures; and (ii) to reach out to Executive Branch departments and agencies, members of Congress who have a particular interest in the work of the Board, organizations with interest and expertise in privacy and civil liberties issues, and other members of the public who may be helpful in bringing issues to the Board's attention. I do not believe that securing office space will present a problem.

3. When did the White House first contact you about serving on the Board? What were you told about the how the Board will function and the timeline for establishing the Board? When were you offered the position of Chairman?

To the best of my recollection, I was contacted about this position in April, and offered the position of Chair within a few weeks thereafter (perhaps in early May). I do not recall conversations addressing the Board's future operations in any detail, but have always had the expectation that the Board would begin functioning promptly after the confirmation of the Chair and Vice Chair.

4. The White House proposed a budget of \$750,000 for the Board for Fiscal Year 2006. The Senate increased this to \$1.5 million. How will the Board set up an office, hire staff, and otherwise function effectively with such a small budget?

It is difficult to anticipate at this preliminary point what the Board's budgetary needs will be. I do note, however, that it is my understanding that the Board will have the authority to use agency detailees on a non-reimbursable basis, which could substantially minimize staff expenses. In any event, I anticipate that the funding needs for the Board's operation will be periodically re-evaluated to ensure that the Board has the necessary resources to fulfill its mission.

# Senate Judiciary Committee Hearing on "Executive Nominations" Tuesday, November 8, 2005

### Questions Submitted by U.S. Senator Russell D. Feingold to Carol Eggert Dinkins

- 1. As the first Chair of the Privacy and Civil Liberties Oversight Board, you would have a hand in setting the tone and shaping the Board's role as part of the Executive Office of the President. You would have no precedent or past practice to rely on.
  - a. What do you see as the Board's role, and what range of issues do you think the Board can and should address?
  - b. Please list at least ten issues that you believe the Board should address.

The substantive purview of the Board is set forth in section 1061 of the Intelligence Reform and Terrorism Prevention Act of 2004 (IRTPA): the Board's function is to provide advice and oversight to the President and Executive Branch officials to ensure that privacy and civil liberties concerns are appropriately considered during the development and implementation of Executive Branch counter-terrorism policies. I am reluctant to identify a list of specific substantive issues that I believe the Board should consider in fulfilling its statutory mandate, for two reasons. First, the Board has not yet met, and I do not wish to make statements that might be perceived, were I to be confirmed, as pre-committing the Board to focus on particular subjects; these are decisions for the Board to make together. Second, the Board will need to be flexible in order to fulfill its advisory functions as new Executive Branch counter-terrorism policies are developed, and identifying a lengthy list of specific substantive priorities at the outset of the Board's work might impede the Board in fulfilling this function.

With that said, there are several issues that I would expect that the Board would be likely to address. One of these issues is information sharing. The Board's functions will include (i) reviewing any guidelines established (pursuant to section 1016(d) of IRTPA) for the acquiring, accessing, sharing, and use of terrorism information; and (ii) examining the practices of relevant executive departments in implementing those guidelines, in order to determine whether such practices appropriately protect privacy and civil liberties. Other issues that the Board might address include: USA Patriot Act policy development and implementation; privacy and civil liberties issues raised by new technological

tools, including "data-mining" technologies; "no-fly" lists, passenger screening, and related issues involving privacy in the context of aviation security; and the development of policies, procedures, and technologies that will enhance cooperation and coordination among agencies in protecting privacy and civil liberties.

2. What do you see as the three highest priorities for the Board in its first few months of existence?

If confirmed, I would view the first priority of the Board as that of hiring an executive director and other necessary staff to help the Board get up and running. Second, the Board will need to convene to develop its procedures and to set its agenda so it can move forward on the matters it believes to warrant immediate attention. Third, it will be important for the Board to reach out to Executive Branch departments and agencies, members of Congress who have a particular interest in the work of the Board, organizations with interest and expertise in privacy and civil liberties issues, and other members of the public who may be helpful in bringing issues to the Board's attention.

- 3. Congress's goal in creating this Board was to ensure internal oversight within the Executive Branch of the privacy issues that cut across agencies, by creating an entity whose sole purpose is to consider the privacy implications of government policies. The Board was placed inside the Executive Office of the President to ensure that the Board members would have a seat at the table when important Executive Branch decisions implicating civil liberties are made.
  - a. How will you make sure that Board members get a seat at the table? How will you make sure that Board members know what decisions are being made, and that it has input into those decisions?
  - b. Placing the Board inside the Executive Office of the President may make it more difficult for the Board to retain its independence. What steps do you plan to take to ensure the independence of the Board?

If confirmed, one of my top priorities would be to develop procedures to facilitate the Board's involvement in the process by which counter-terrorism policies are developed and implemented. I believe that the senior Executive Branch experiences that I and my potential colleagues on the Board have held in the past will position us well to develop procedures that will ensure that we have an important voice in the policy development process.

As to the issue of independence, the President will be best served if the Board offers unvarnished and candid advice concerning whether counter-terrorism policies are developed with adequate consideration of privacy and civil liberties issues. I am confident that, if confirmed, both I and my distinguished colleagues will exercise independent judgment, and advise the President accordingly. I also note that I do not view the placement of the Board within the Executive Office of the President as an impediment to the Board's effectiveness. Quite the contrary; the location of the Board within the Executive Office of President will provide it with a proximity to the senior Executive Branch decisionmaking process that will make it more likely that the Board is informed and influential.

4. You have worked inside the Executive Branch in different capacities over the years. Your role on the Privacy and Civil Liberties Oversight Board will be to serve as a check on the government's decision-making. What experiences can you point to that would demonstrate to this Committee that you would be willing and able to question the power of the Executive Branch? In what circumstances have you actually done so?

As Deputy Attorney General, and prior to that as Assistant Attorney General in charge of the Environment and Natural Resources Division at the Department of Justice, I had responsibility to ensure the integrity of law enforcement and criminal investigations. When I held those positions, I was responsible for oversight of federal law enforcement activities, and for insulating the law enforcement process from inappropriate political pressure from Congress or the Executive Branch. Through these experiences I developed a heightened appreciation of the importance of institutionalized checks on government authority, and an increased awareness of the fact that the development and implementation of Executive Branch policies must take into account Americans' privacy and civil liberties. If confirmed, I will draw upon these experiences as Chair of the Board.

- 5. In last Sunday's Washington Post (11/6/05), there was a lengthy story about the FBI's use of National Security Letters, which FBI field offices can issue without judicial approval to obtain certain types of business records. The National Security Letter authority was significantly expanded by the Patriot Act.
  - a. If you had already been confirmed to the Board when that story was published, what would you have done in response?
  - b. Do you think there needs to be more oversight of the FBI's use of National Security Letters? Do you think the Privacy and Civil Liberties Oversight Board should play a role in that?

- c. Do you think it is appropriate for the FBI to retain all of the information it obtains through the use of National Security Letters, including information on innocent Americans, even if it has determined that the information has not generated any leads?
- d. As a Board member, would you be prepared to recommend changes in existing laws or guidelines governing National Security Letters if you thought that was the appropriate response?

As noted above, I am reluctant to make any statements to the Committee that could be perceived as committing the Board to review a particular area, or to a particular process for conducting its oversight responsibilities. It will be up to the members of the Board, sitting together, to make these decisions in a manner consistent with its statutory mandate.

Were the Board to decide that it was appropriate to address this issue, however, I believe it would be important at the outset to develop a clear understanding of the facts, as published articles addressing this issue suggest that there is disagreement concerning the nature and extent of oversight of the National Security Letter process. With that said, any issue concerning the retention of information pertaining to American citizens in the context of counter-terrorism policy development and implementation raises privacy issues that it could be appropriate for the Board to examine. In response to sub-question (d), if confirmed I would not hesitate to recommend changes to Executive Branch guidelines governing National Security Letters, if based upon the Board's inquiries the Board reached the conclusion that this was an appropriate response.

- 6. I have expressed concerns about the efficacy and the privacy implications of data mining technology. I believe that the American public and the Congress need more information about what the government is planning and what it is already doing in this area.
  - a. What potential privacy and civil liberties issues do you think relate to data mining? What will you do to promote transparency in the Executive Branch on this issue?
  - b. If there had been a Privacy and Civil Liberties Oversight Board when the revelations about the Total Information Awareness program at the Pentagon became public, what do you think the Board should have done in response?

Without pre-committing the Board to consider any specific issue, I do expect—as noted above—that the appropriateness of the use of "data-mining" technologies as part of or in furtherance of government counter-terrorism policy is an issue that the Board may confront. In reviewing Executive Branch policies in

this area, I would work with interested entities and groups outside the Executive Branch to identify the potential privacy and civil liberties issues raised by these technologies, and what steps might be appropriate to enhance public awareness of how publicly available information about American citizens is used by the government.

In response to the specific question about whether and how the Board would have addressed revelations about the Department of Defense's Total Information Awareness Program, I believe that the appropriate first step would have been to reach out to the appropriate policymakers in the White House and the Department of Defense to learn more about the policies at issue. The next step would have been to consider whether the Board—as opposed to an entity within the Department of Defense-should evaluate the issue before the Department had conducted its own robust review. The Board will not be-and must not be-the only entity in the Executive Branch addressing and advancing privacy and civil liberties issues, and it may be appropriate in some circumstances for agency-level entities to take the lead in studying issues in the first instance, and for the Board to then review and judge the agency-level assessment. (In this specific case, Secretary Rumsfeld commissioned a special advisory panel to examine the legal and policy issues raised by these technologies; therefore, had it existed at that time, the Board would have determined how to factor in this panel's work in carrying out the Board's own responsibilities.) Upon taking stock of the overall situation, the Board would have made recommendations to the President and the Secretary of Defense concerning whether privacy and civil liberties concerns were adequately considered in connection with the program.

7. One failing prior to September 11 was that our intelligence and law enforcement agencies were not sufficiently sharing information with each other to effectively combat terrorism, in large part due to a culture of competition and distrust that had developed over the years. Congress has been working to encourage agencies to share important terrorism information and to better coordinate their work. What kinds of privacy and civil liberties issues do you think might arise as agencies share more information with each other than ever before?

As noted above, issues concerning the collection, sharing, and use of terrorism information are at the heart of the Board's statutory mandate. Section 1061 of IRTPA reflects Congress's view that the vigorous prosecution of the war on terror may require the federal government to exercise new or enhanced authorities, and that one of the Board's functions is to ensure that appropriate concerns about civil liberties and privacy are considered as these authorities are developed and exercised. While many have emphasized the importance of robust

information sharing for the effective prosecution of the war on terrorism, the collection, sharing, and use of information concerning American citizens implicate privacy and civil liberties issues. It will be one of the Board's central functions to review proposed information-sharing guidelines to ensure that privacy and civil liberties issues are given appropriate consideration, and to take steps to ensure existing laws and regulations in this area are followed when agencies share information.

8. How would you plan to conduct oversight of the government's domestic surveillance powers under the Foreign Intelligence Surveillance Act and other laws?

As I have indicated, I wish to avoid making any statements that might be perceived as pre-committing the Board to advise or perform oversight in a particular area. The Foreign Intelligence Surveillance Act (and implementing regulations and policies) establishes a system of judicial, congressional, and Executive Branch oversight of domestic surveillance activities, and it would be inappropriate for me to assume without further study that existing oversight mechanisms in this area are inadequate. However, should the Board review those oversight processes and conclude that further oversight mechanisms are needed, I would, if confirmed, make appropriate recommendations in this area to the President and the Attorney General.

9. What would you have advised the Administration in the months after September 11 when it was developing its policies on enemy combatants and the detention of individuals at Guantanamo Bay? Please comment specifically on the Administration's policies regarding: (1) the detention of enemy combatants at Guantanamo Bay; (2) the indefinite detention of U.S. citizens without charges as enemy combatants; (3) the use of Combatant Status Review Tribunals; and (4) the trial of enemy combatants who have been charged in military commissions.

A thoughtful response to these questions would require familiarity with several complicated and interrelated areas of law and policy, including: the Geneva Conventions, the customary laws of war, and other applicable areas of international or common law; the Supreme Court's decisions concerning the scope of constitutional and statutory protections for enemy combatants and other detainees; and the current procedures in place at Guantanamo Bay. While I am generally familiar at this time with the topics raised in this question, I cannot claim sufficient knowledge or expertise about them to offer what I would judge to be an appropriately informed answer to these difficult legal and policy questions.

10. As a new entity, the Board has no existing infrastructure.

- a. How many staff members do you think the Board will need to fulfill its statutory mission?
- b. How quickly do you think the Board will be up and running?

If confirmed, my immediate priority will be to engage an executive director who, together with members of the Board, would take the lead in hiring or obtaining the appropriate number administrative staff to run the office. It is difficult to anticipate the Board's precise staffing needs until the Board meets to develop its agenda. It is worth noting, however, that Congress has given the Board considerable flexibility in developing an appropriate staff; section 1061 of IRTPA authorizes the Board to satisfy its personnel needs through new hires, consultants, or detailees from other government organizations. If confirmed, I would be inclined towards utilizing a mix of these personnel authorities, complementing a comparatively small full-time generalist staff with "surges" of detailees and consultants with expertise or experience in particular substantive areas. If Alan Raul and I are confirmed, we will promptly convene the Board for its initial meeting, with the intention of getting the Board up and running as soon as possible.

11. The statute creating the Board requires it to report to Congress. What role do you think the Board should play in communicating more broadly with the American public on privacy and civil liberties issues?

Section 1061 of IRTPA directs the Board to prepare periodic reports to Congress that are "unclassified to the greatest extent possible," which should facilitate transparency. I also believe that outreach is essential and, if I am confirmed, I will make consultation with interested groups and organizations a top priority. This process will not only generate useful ideas for the Board, but will provide the Board with an opportunity to communicate with individuals and groups outside government about its activities.

- 12. The statute establishing the Board states that the Chair may be a full-time position. In your answers to the questionnaire you stated that you would continue to practice law at Vinson & Elkins in Houston while serving as Chair of the Board.
  - a. How frequently do you plan to come to Washington to fulfill your role as Chair?
  - b. How did you come to the decision to be a part-time Chair? Is it your belief that the Board will not need your full attention?
  - c. If the Board's work turns out to be more than you anticipate, are you prepared to scale back even further, or leave, your private practice?

I am honored to have been nominated to chair the Privacy and Civil Liberties Oversight Board, and, if confirmed, I am committed to doing whatever is needed to make it a success. I anticipate that that this will include a substantial commitment of my personal time, and I expect to travel to Washington, D.C. frequently to chair Board meetings and to attend to Board business. While I and the other members of the Board will continue to meet our professional and business obligations in the private sector, I am convinced that the individuals the President has nominated or appointed have the experience and proven dedication to public service necessary to make the Board effective and influential.

- 13. You have extensive experience in environmental, natural resource, and energy law. But your record does not indicate that you have any experience dealing with privacy and civil liberties issues.
  - a. Why are you qualified to serve on the Board?
  - b. Why are you qualified to serve as Chair of the Board?
  - c. How will you be able to effectively carry out the Board's mission, having never worked with these issues before?
  - d. What can you point to in your experience that will show the Committee that you can be the strong, confident, independent voice the Board needs, even though you have no background in the area?

In my role as Deputy Attorney General of the United States, I frequently dealt with the privacy and civil liberties issues that arise in the context of domestic surveillance and counterintelligence, and I believe that this substantive experience will be an asset to the Board. I also note that being Chair of the Board will require, perhaps above all else, strong leadership and management skills, and I have extensive leadership experience both inside and outside of government. In addition to my service as Deputy Attorney General and Assistant Attorney General, I have chaired a number of organizations, and have assumed several high-level management responsibilities in my law firm. While I cannot speak to the reasons that led the President to nominate me for this position, I believe that I have both the management skills and the substantive experience needed to lead the Board effectively. If confirmed, I would also have the benefit of the experience and talents of an exceptional group of colleagues whom the President has nominated or appointed to serve with me on the Board.

14. In your confirmation hearing, you said that one of the Board's first priorities would be to identify and reach out to experts for guidance on your agenda and policies. What factors will you consider in deciding whom to consult? Will you look beyond the government and across the political spectrum?

If confirmed, I will consult a wide range of experts and organizations to seek their views concerning the Board's agenda and policies. This consultation process would include outreach both to current and former government officials, and to those outside the government who might provide relevant insights (including non-governmental organizations with expertise on privacy and civil liberties issues). If confirmed, I will look beyond the government and across the political spectrum to consult with those having an interest in the work of the Board.

Questions from Senator Patrick Leahy
Ranking Member, Committee on the Judiciary
Hearing on "Executive Nominations"
to the Privacy and Civil Liberties Oversight Board
November 8, 2005

#### **Questions for Carol Eggert Dinkins**

1. I reviewed your questionnaire responses, and I noticed that you have a good deal of experience and have authored articles on environmental and energy law issues. However, I did not see many details on your privacy background. Can you please describe any cases or experiences you have had in addressing privacy matters, including the circumstances raising those issues, your role in those matters, and how they were resolved?

(I note that this response tracks in certain respects my responses to similar questions from Senator Feingold.) In my role as Deputy Attorney General of the United States, I frequently dealt with the privacy and civil liberties issues that arise in the context of domestic surveillance and counterintelligence. As a related matter, both as Deputy Attorney General and as Assistant Attorney General in charge of the Environment and Natural Resources Division of the Department of Justice I had the responsibility to ensure the integrity of law enforcement and criminal investigations. In both of these positions, I was responsible for oversight of federal law enforcement activities, which included ensuring that the privacy and civil liberties of criminal suspects and criminal defendants were protected. Through these experiences I developed a heightened appreciation of the importance of institutional checks on government authority, and an increased awareness of the fact that the development and implementation of Executive Branch policies must take into account Americans' privacy and civil liberties. If confirmed, I will draw upon these experiences as Chair of the Board.

2. If you are confirmed, how soon would you have a fully functioning Board? What will your first priorities be?

(I note that this response tracks in certain respects my response to a similar question from Senator Feingold.) If Alan Raul and I were to be confirmed, I would promptly convene the Board for its initial meeting. I would view the hiring of an executive director and other necessary staff as a top priority, to help the Board move forward quickly in fulfilling its statutory mission. It would also be very important for the Board to develop internal procedures and to set a substantive agenda. In developing this agenda, it will be critical for the Board to reach out to Executive Branch departments and agencies, members of Congress who have a particular interest in the work of the Board, organizations with interest and expertise in privacy and civil liberties issues, and other members of the public who may be helpful in bringing issues to the Board's attention.

3. One of the goals of the Intelligence Reform Act was to improve information sharing because this area has been a significant weakness in our response to terrorism. But it is important to have effective guidelines in place that protect individual privacy and liberty as this new environment is developed. One of the key responsibilities of the new Board will be to review the Executive Branch's implementation of the information sharing requirements in subsections (d) and (f) of Section 1016 of the Intelligence Reform Act to make sure they properly protect privacy and civil liberties.

Many of the information sharing efforts are underway, so it will be important for the Board to participate in these developments as soon as possible.

What are your plans for assessing the information sharing environment? What are your thoughts on how to balance the goals of effective sharing, while also protecting privacy and civil liberties?

(I note that certain parts of this response track my response to a similar question from Senator Feingold.) Issues concerning the collection, sharing, and use of terrorism information are, as you rightly point out, at the heart of the Board's statutory mandate. The provision of the Intelligence Reform and Terrorism Prevention Act of 2004 that creates the Board expresses Congress's view that the vigorous prosecution of the war on terror may require the federal government to exercise new or enhanced authorities, and that one of the Board's functions is to ensure that appropriate concerns about civil liberties and privacy are considered as these authorities are developed and exercised. While many have emphasized the importance of robust information sharing for the effective prosecution of the war on terrorism, the collection, sharing, and use of information concerning American citizens clearly implicate privacy and civil liberties issues.

IRTPA recognizes the need for a balance between increased information sharing and privacy protection, and indeed specifically provides that the new Information Sharing Environment be governed by guidelines for the protection of privacy and civil liberties. I view it as one of the Board's central functions to review information-sharing guidelines to ensure that privacy and civil liberties issues are given appropriate consideration during the policymaking process. To the extent the development of these rules is already underway, I share your view that it is important that the Board become involved in the process promptly after a Chair and Vice Chair are confirmed.

4. We are in an era in which advanced technologies provide important protective tools, but also create significant challenges to liberties.

How would you describe your experience and understanding of advanced technologies capable of tracking and sharing personal data?

I do not have expertise in this particular area, which I recognize to be one that the Board very well may confront. I note that some of my potential colleagues on the Board—including Alan Raul, whom the President has nominated to be Vice Chair—do

have experience in addressing these issues, and I would look forward to working with them (and experts in the field inside and outside of government) to increase my understanding in this area. With that said, as a general matter, I am of the view that the goals of protecting privacy and sharing information are not always at cross-purposes. As groups that have explored this area—including the Markle Foundation and the Robb-Silberman Commission—have observed, and as your question suggests, some of the same new technologies that could enhance information sharing also have capabilities that can be used to protect against the misuse of information (such as auditing capabilities or sophisticated access controls). While I am hesitant to venture too far into a discussion of this issue without further study, this seems to me a valuable insight.

## Senator Dick Durbin Questions for Alan Charles Raul Nominee to be Vice Chairman of the Privacy and Civil Liberties Board

1. You are a Partner in a large law firm, which must consume a great deal of your time. The Board has substantial responsibilities, including ensuring that privacy and civil liberties concerns are appropriately considered in the Executive Branch's development and implementation of all counterterrorism-related laws, regulations, and policies. If confirmed, how much time do you estimate that you will spend per week on the Board's work?

If confirmed, I would ensure that I make the necessary time available for work on the Board. As a matter of both legal obligation and professional responsibility, it would be inconceivable not to dedicate the personal time and effort required to make the Board a success if I am given the opportunity to serve on it. I believe the Board and its work are fundamentally important, and if confirmed as Vice Chairman, I will conduct myself accordingly, consistent with Congress' creation of the position as a part-time post to be filled by someone working outside government.

2. We are approaching the one-year anniversary of the passage of the Intelligence Reform Legislation and it is important that the Board begin its important work as soon as possible. What is your timeline for making the Board operational, including hiring an Executive Director and staff and securing office space?

If confirmed, and assuming Carol Dinkins' confirmation, I would anticipate that the members of the Board would be convened promptly after confirmation and that candidates for Executive Director will be considered—and, I hope, a suitable candidate selected—very quickly. Once the Board is fully constituted, I would expect that the Board would seek and quickly obtain suitable and sufficient space. I cannot predict exactly when this will happen, but my expectation is that Ms. Dinkins and I, and the other members of the Board, are prepared and eager to move forward quickly, assuming confirmation.

3. When did the White House first contact you about serving on the Board? What were you told about the how the Board will function and the timeline for establishing the Board? When were you offered the position of Vice-Chairman?

To the best of my recollection, I was contacted by the White House in or around May 2005. I believe I was informed of the President's decision to nominate me as Vice Chairman at the end of May or beginning of June 2005, subject to background investigations. I do not recall discussing any specifics about the timeline for establishing the Board or the Board's functioning.

4. The White House proposed a budget of \$750,000 for the Board for Fiscal Year 2006. The Senate increased this to \$1.5 million. How will the Board set up an office, hire staff, and otherwise function effectively with such a small budget?

Before being confirmed, and convening with my potential fellow Board members, I cannot predict what the precise administrative needs of the Board will be. However, I believe that the authorizing statute provides considerable flexibility for the Board, including the ability to rely on non-reimbursable detailees from other agencies, and also authorizes the use of consultants. Accordingly, I believe the Board should have sufficient ability to hire key staff from within the appropriated budget, and supplement the paid staff with detailees and consultants.

### Senate Judiciary Committee Hearing on "Executive Nominations" Tuesday, November 8, 2005

#### Questions Submitted by U.S. Senator Russell D. Feingold To Alan Charles Raul

- 1. As the first Vice Chair of the Privacy and Civil Liberties Oversight Board, you would have a hand in setting the tone and shaping the Board's role as part of the Executive Office of the President. You would have no precedent or past practice to rely on.
  - a. What do you see as the Board's role, and what range of issues do you think the Board can and should address?
  - b. Please list at least ten issues that you believe the Board should address.

Section 1061 of the Intelligence Reform and Terrorism Prevention Act of 2004 (IRTPA) sets forth the Board's role and responsibilities. It is to provide advice to and oversight of the Executive Branch with regard to the privacy and civil liberties implications of policies and actions designed and implemented to fight the war on terrorism. Specifically, the Board must ensure that privacy and civil liberties concerns are appropriately considered in the development and implementation of policies designed to protect the nation from terrorism, including especially the guidelines for sharing information among intelligence, counterterrorism, and law enforcement agencies of government.

In advance of possible confirmation, and prior to an opportunity to convene as a group with the others members of the Board to determine the Board's collective priorities, I would not wish to make statements to the Committee that might be viewed as pre-committing the Board to a particular or comprehensive list of issues. As a general matter, however, the following are among the subjects that I expect the Board would be likely to address:

Information sharing policies and procedures among federal agencies.

USA PATRIOT Act policy development and implementation.

The use of "data mining" technologies by federal agencies.

"No-fly lists," "watch lists," and ethnic profiling.

The adequacy of existing agency policies and procedures designed to ensure compliance with constitutional and statutory privacy and civil liberties protections.

2. What do you see as the three highest priorities for the Board in its first few months of existence?

Were I to be confirmed, I would recommend that the Board take the procedural steps necessary to begin carrying out its statutory mission quickly and effectively. These steps include:

Convening the Board and setting a substantive agenda.

Appointing an Executive Director and hiring key staff.

Drafting and approving a charter for the Board's activities.

Obtaining briefings from relevant Executive Branch personnel.

Consulting knowledgeable and concerned parties outside of the Executive Branch.

Assuring that the Board has a well-defined role in the Executive Office of the President's policy clearance process.

- 3. Congress' goal in creating this Board was to ensure internal oversight within the Executive Branch of the privacy issues that cut across agencies, by creating an entity whose sole purpose is to consider the privacy implications of government policies. The Board was placed inside the Executive Office of the President to ensure that the Board members would have a seat at the table when important Executive Branch decisions implicating civil liberties are made.
  - a. How will you make sure that Board members get a seat at the table?

    How will you make sure that Board members know what decisions are being made, and that it has input into those decisions?
  - b. Placing the Board inside the Executive Office of the President may make it more difficult for the Board to retain its independence. What steps do you plan to take to ensure the independence of the Board?

The Board's ability to influence the development and implementation of policy will depend on the focus and determination of the Board's members, and the Board and staff's ability to become sufficiently informed about relevant

processes and practices. Having previously worked in the White House and in the Office and Management and Budget, I hope and believe I could bring to the Board valuable experience in, and understanding of, the Executive Branch policy development, clearance, and approval process.

Ultimately, the Board's independence is a function of the character and commitment of the Board's members. Of course, IRTPA states that the Board is part of the Executive Office of the President, and its members serve at the pleasure of the President. But the placement of the Board within the Executive Office of the President brings with it real advantages, as proximity to the senior policymaking process will give the Board additional opportunities to be informed and influential. The President will be best served if the Board exercises and expresses independent judgment to ensure that IRTPA's objectives are carried out, and that privacy and civil liberties issues are appropriately considered in the nation's war against terrorism.

4. You have worked inside the Executive Branch in different capacities over the years. Your role on the Privacy and Civil Liberties Oversight Board will be to serve as a check on the government's decision-making. What experiences can you point to that would demonstrate to this Committee that you would be willing and able to question the power of the Executive Branch? In what circumstances have you actually done so?

I would not have agreed to be nominated for Vice Chairman of this Board, and if confirmed, to serve in that capacity, if I were not prepared and did not intend to provide the President and the Executive Branch advice that reflects my independent judgment. I recognize that, if confirmed, I and the other members of the Board will likely confront situations and issues where it will be appropriate to raise questions about Executive Branch proposals, and I will not hesitate to do so if I believe that to be the proper course.

I believe that actions I have taken in my career show that I am willing to question the use of executive power, and to advance the position that institutional checks on the exercise of that power are necessary and appropriate. Of particular relevance to the Committee's consideration of my nomination, I recommended in December, 2001, that the President establish an independent commission to advise the President on civil liberties issues. I did so because I believed, and continue to believe, that these considerations must influence our country's actions—even during the war against terrorism—and that the public must appreciate that these considerations are given appropriate weight by government decisionmakers.

- 5. In last Sunday's Washington Post (11/6/05), there was a lengthy story about the FBI's use of National Security Letters, which FBI field offices can issue without judicial approval to obtain certain types of business records. The National Security Letter authority was significantly expanded by the Patriot Act.
  - a. If you had already been confirmed to the Board when that story was published, what would you have done in response?
  - b. Do you think there needs to be more oversight of the FBI's use of National Security Letters? Do you think the Privacy and Civil Liberties Oversight Board should play a role in that?
  - c. Do you think it is appropriate for the FBI to retain all of the information it obtains through the use of National Security Letters, including information on innocent Americans, even if it has determined that the information has not generated any leads?
  - d. As a Board member, would you be prepared to recommend changes in existing laws or guidelines governing National Security Letters if you thought that was the appropriate response?

First and foremost, I would absolutely be prepared to recommend changes if I believed them to be necessary or appropriate. As to responding to the specific issues presented in the Washington Post article, I believe that, if confirmed, I would need to review the facts from all relevant perspectives and, of course, consult my fellow Board members. I am confident that if the Board had been in existence at the time of the article's publication, the Board would have made appropriate inquiries within the Executive Branch and then proceeded to determine how the Board should address the issues presented.

While I obviously do not have all of the relevant facts at this time, and I cannot presume to predict how the Board would or should have responded, I believe that I would have encouraged the Board to inform itself about the uses of National Security Letters, the existing means of oversight in place with respect to such Letters, and existing policies on the maintenance and disposition of information collected pursuant to such Letters. While I cannot assess at this time whether the cited article contains all the relevant facts concerning the National Security Letter process, the article does reflect the importance of and public interest in the government's reliance on this tool in the war against terrorism. While the press must not, of course, dictate the Board's priorities, articles like the one in the Washington Post on November 6, 2005, can serve to raise issues worthy of further attention by advisory and oversight bodies such as the Board.

6. I have expressed concerns about the efficacy and the privacy implications of data mining technology. I believe that the American public and the Congress

need more information about what the government is planning and what it is already doing in this area.

- a. What potential privacy and civil liberties issues do you think relate to data mining? What will you do to promote transparency in the Executive Branch on this issue?
- b. If there had been a Privacy and Civil Liberties Oversight Board when the revelations about the Total Information Awareness program at the Pentagon became public, what do you think the Board should have done in response?

If confirmed, I believe that I would encourage the Board to develop a thorough understanding of actual and prospective governmental data mining practices. Without prejudging the priorities of the Board, I believe that data mining presents issues as complex and important as any the Board may face. At this time, I do not view myself as having enough information or perspective to commit to what recommendations I would make, if confirmed, for the consideration of my potential fellow Board members. I would expect, however, that the Board would wish to benefit from points of view on the subject of government data mining from knowledgeable parties both within and outside of the Executive Branch. This will be an area where I suspect that the Board would benefit from a great deal of education, analysis, and philosophical debate.

With respect to how the Board would have addressed revelations about the Department of Defense's Total Information Awareness Program, I believe that the Board would likely have embarked in earnest, if it had not already done so, on the education process mentioned in the prior paragraph. The Board would likely have sought to benefit from the prior work and analysis undertaken by the review panel established by Secretary Rumsfeld to advise on this specific subject, and then determined what further inquiry, advice, or oversight was necessary or appropriate if it appeared that the program in question was going forward. If the program or policy were to be implemented or continued, I assume the Board would have seen fit to weigh the recommendations of Secretary Rumsfeld's distinguished review panel and provide any further advice and oversight necessary or appropriate to ensure adequate consideration of the privacy and civil liberties implications of the program.

7. One failing prior to September 11 was that our intelligence and law enforcement agencies were not sufficiently sharing information with each other to effectively combat terrorism, in large part due to a culture of competition and distrust that had developed over the years. Congress has been working to encourage agencies to share important terrorism information and to better coordinate their work. What kinds of privacy and civil liberties issues do you

think might arise as agencies share more information with each other than ever before?

I understand that the legislation creating the Board reflected Congress' desire to ensure that privacy and civil liberties implications be appropriately considered as part of the process for putting enhanced information sharing practices into effect. The lessons of 9/11 teach that all of the country's law enforcement, intelligence, and counter-terrorism agencies must work together and share information in order to protect American citizens as effectively as possible. The lessons of human nature suggest, however, that this necessary and desirable exchange of information could, if unchecked, lead to the misuse of information. Congress has established the Board, as I understand it, to play a role in helping the Executive Branch determine what lines may be appropriate to draw so that Fourth Amendment guarantees and other rights provided by law to criminal suspects and defendants—as well as the legal privacy rights of all Americans—will continue to be respected as more information is shared to prevent and protect the country against terrorism.

8. How would you plan to conduct oversight of the government's domestic surveillance powers under the Foreign Intelligence Surveillance Act and other laws?

Without having been confirmed, and without having met with my potential fellow Board members, I would not wish to presume to know at this time how the Board will discharge its statutory obligations with respect to domestic surveillance under the Foreign Intelligence Surveillance Act and other laws. This will be an area in which, if confirmed, I would encourage the Board to educate itself substantially, and obtain briefings regarding the existing practices and procedures for authorizing, approving, monitoring, and evaluating surveillance activity. I believe it would be premature to have a view at this point concerning whether existing judicial, congressional, or executive branch oversight procedures are adequate, or to have a plan in mind as to how any additional oversight should be conducted. It will be critical, however, for the Board to obtain a thorough and comprehensive understanding of all of the existing mechanisms for oversight of domestic surveillance.

9. What would you have advised the Administration in the months after September 11 when it was developing its policies on enemy combatants and the detention of individuals at Guantanamo Bay? Please comment specifically on the Administration's policies regarding: (1) the detention of enemy combatants at Guantanamo Bay; (2) the indefinite detention of U.S. citizens without charges as enemy combatants; (3) the use of Combatant Status Review Tribunals; and (4) the trial of enemy combatants who have been charged in military commissions.

With respect, this is an important and highly complex area where I do not feel I have the necessary information in hand and the legal analysis in mind to comment meaningfully. I am reluctant to offer hypothetical advice on this subject without a more thorough review and analysis of the Administration's positions and policies, and of the Supreme Court's rulings, in this complicated area.

- 10. As a new entity, the Board has no existing infrastructure.
  - a. How many staff members do you think the Board will need to fulfill its statutory mission?
  - b. How quickly do you think the Board will be up and running?

If confirmed, and assuming Carol Dinkins were also confirmed, I would certainly be prepared to convene promptly an initial meeting with my fellow Board members. I believe that the Board should be in a position to begin procedural deliberations very quickly upon the confirmation of the Chairman and Vice Chairman. The number of staff to be hired would presumably be an early matter for the Board's consideration after an Executive Director is appointed. I do not have a preconceived view of how many staff would be appropriate for the Board, but I believe the IRTPA provides the Board with sufficient authority and flexibility to obtain whatever personnel resources the Board deems necessary to assist it in carrying out its statutory responsibilities.

11. The statute creating the Board requires it to report to Congress. What role do you think the Board should play in communicating more broadly with the American public on privacy and civil liberties issues?

If confirmed, I would encourage the Board to reach out to knowledgeable and interested members of the public to benefit from their information, experience and perspectives. I also believe that the Board should consider whether there is an appropriate role for it to communicate more broadly with the public to help explain how privacy and civil liberties issues are considered within the Executive Branch. Whether or not this is a good idea, and if so, how it could be executed, would need to be assessed by the entire Board. If confirmed, I believe that I would want to discuss this with my potential fellow Board members, but I would not presume to pre-judge how this issue would be resolved.

12. Your record shows that your experience with privacy issues has been largely in the corporate world, dealing with consumer privacy issues. Please explain the difference between the privacy concerns related to private companies collecting and using personal information and those implicated by the

government's collection and use of personal information, particularly for counterterrorism purposes.

The government's collection and use of personal information is constrained by constitutional, statutory, and regulatory provisions that are not implicated when private sector actors engage in similar conduct—and with good reason. The federal government has greater powers to collect—and therefore, theoretically, a greater ability to misuse—information than does any corporation or private citizen. Also, the government at times is in a position to collect and use information about individuals without their consent or knowledge, a circumstance that is not generally presented when private sector actors collect information, as private entities typically (though not exclusively) obtain information directly from individuals in consensual interactions. With the federal government's potentially sweeping powers to collect and use personal information come great moral obligations, in addition to constitutional and statutory restraints. As Congress has noted in adopting the Privacy Act, it is necessary and proper to regulate the collection, maintenance, use, and dissemination of information by federal agencies.

# Questions from Senator Patrick Leahy Ranking Member, Committee on the Judiciary Hearing on "Executive Nominations" to the Privacy and Civil Liberties Oversight Board November 8, 2005

#### **Questions for Alan Charles Raul**

1. The government is increasingly using the private sector to access individual's personal data and so-called "actionable intelligence" to aid law enforcement and national security efforts. Earlier this year, a January 20 Washington Post article quoted the vice-president of ChoicePoint, a commercial data broker that provides such services to the government, as stating: "We do act as an intelligence agency, gathering data, applying analytics." A November 2005 article in the National Journal, "The Private Spy Among Us," reported that ChoicePoint has built an exclusive data-searching system for the FBI and DOD to access information about Americans.

Recently, the Washington Post also reported that the FBI is not only gathering an unprecedented amount of data on Americans from private entities through National Security Letters, but is also entering this information into government databases that can be mined and accessed, seemingly in perpetuity.

These developments raise concerns about inadequate oversight, potential for mission creep, or simply ineffective or overly intrusive applications.

- (a) What are your thoughts on how to address government use of personal data in an age where the boundaries between privately-collected data and government data are being blurred?
- (b) Should there be any limitations or guidelines on the government's reliance on commercial data brokers for law enforcement functions? How would you go about evaluating the impact of those efforts on privacy and civil liberties?
- (c) There are several types of data mining, ranging from mere linking to a perhaps more controversial form, pattern-recognition analysis. What are your views on data mining? Should there be any limitations or guidelines on the government's use of data mining, and if so, what should those be?

I have provided the following response to Senator Feingold which addressed a similar question he posed to me on the issue of data mining:

If confirmed, I believe that I would encourage the Board to develop a thorough understanding of actual and prospective governmental data mining practices. Without prejudging the priorities of the Board, I believe that data mining presents issues as complex and important as any the Board may face. At this time, I do not view myself as having enough information or perspective to commit to what recommendations I would make, if confirmed, for the consideration of my potential fellow Board members. I would expect, however, that the Board would wish to benefit from points of view on the subject of government data mining from knowledgeable parties both within and outside of the Executive Branch. This will be an area where I suspect that the Board would benefit from a great deal of education, analysis, and philosophical debate.

With respect to how the Board would have addressed revelations about the Department of Defense's Total Information Awareness Program, I believe that the Board would likely have embarked in earnest, if it had not already done so, on the education process mentioned in the prior paragraph. The Board would likely have sought to benefit from the prior work and analysis undertaken by the review panel established by Secretary Rumsfeld to advise on this specific subject, and then determined what further inquiry, advice, or oversight was necessary or appropriate if it appeared that the program in question was going forward. If the program or policy were to be implemented or continued, I assume the Board would have seen fit to weigh the recommendations of Secretary Rumsfeld's distinguished review panel and provide any further advice and oversight necessary or appropriate to ensure adequate consideration of the privacy and civil liberties implications of the program.

Senator Feingold also asked me a question concerning National Security Letters, to which I responded as follows:

First and foremost, I would absolutely be prepared to recommend changes if I believed them to be necessary or appropriate. As to responding to the specific issues presented in the Washington Post article, I believe that, if confirmed, I would need to review the facts from all relevant perspectives and, of course, consult my fellow Board members. I am confident that if the Board had been in existence at the time of the article's publication, the Board would have made appropriate inquiries within the Executive Branch and then proceeded to determine how the Board should address the issues presented.

While I obviously do not have all of the relevant facts at this time, and I cannot presume to predict how the Board would or should have

responded, I believe that I would have encouraged the Board to inform itself about the uses of National Security Letters, the existing means of oversight in place with respect to such Letters, and existing policies on the maintenance and disposition of information collected pursuant to such Letters. While I cannot assess at this time whether the cited article contains all the relevant facts concerning the National Security Letter process, the article does reflect the importance of and public interest in the government's reliance on this tool in the war against terrorism. While the press must not, of course, dictate the Board's priorities, articles like the one in the Washington Post on November 6, 2005, can serve to raise issues worthy of further attention by advisory and oversight bodies such as the Board.

On the general issue of the government's use of commercial data sources, if confirmed, I would encourage the Board to become informed on how the government uses data from commercial sources, and to hear from concerned and knowledgeable parties who believe that such uses could circumvent legal restrictions otherwise applicable to the government. As a threshold matter, I do not believe the federal government may evade legal limits on its information collection practices by relying on third parties to do indirectly what it would not be authorized to do directly. However, it would also seem unreasonable to categorically prohibit the government from purchasing commercially available information that is legally collected by private purveyors. There are numerous laws such as the Electronic Communications Privacy Act and the Privacy Act, in addition to the Fourth Amendment itself, that impose constraints and restrictions on the federal government that do not apply to the same type of data when collected or maintained by the private sector. Sorting out the application and consequences of these different rules in the context of government reliance on commercial data brokers is a highly complex subject. I would expect the Board to receive considerable information and insight from all sides of the public debate.

Your question also makes reference to ChoicePoint. I wanted to bring to your and the Committee's attention the fact that ChoicePoint has consulted me recently regarding certain legal issues faced by that company. I have not yet been retained by ChoicePoint, and if confirmed, I will not represent it in a manner that constitutes lobbying the federal government to procure and use ChoicePoint's data or services. However, if confirmed, I will consult with the ethics lawyer assigned to the Privacy and Civil Liberties Oversight Board concerning recusal where appropriate from matters before the Board which could have an impact on litigation or other matters on which I am representing ChoicePoint, as well as any matters before the Board to which ChoicePoint is a party.

2. In a December 5, 2001 editorial in the Los Angeles Times, you suggested that the President should establish a "blue-ribbon civil liberties council that would advise him privately on the wisdom and implications of new anti-terror measures" and help the President assess whether "the country is better off limiting certain civil liberties for a time in favor of safeguarding American lives and livelihoods", and serve as a "confidential sounding board" to make "hardnosed calls".

But Congress has empowered this Privacy Board to be more than just a private sounding board for the President. The statute empowers the Board to engage and advise any Department or Agency in the Executive branch on regulations and laws, and compel access to records, audits, reports and other documents as necessary. More importantly, the statute directs the Board to consider whether the Department or Agency has provided adequate supervision and guidelines for its use of power, and has explained how the need for the power "is balanced with the need to protect privacy and civil liberties." In addition, the Board is directed to regularly review policies and report to Congress annually.

Given the responsibilities and powers that Congress has granted, do you view your role and that of the Board differently than the council you described in 2001? Do you view this Privacy Board as more than just a private sounding board for the President?

I am proud to have been an early, and perhaps even one of the first proponents of a civil liberties panel to advise the President in the aftermath of 9/11. I recognize, however, that the Board created by Congress in the Intelligence Reform and Terrorism Prevention Act of 2004 (IRTPA) is not fully congruent with the council I recommended in the Los Angeles Times. The statutory Board established by IRTPA has formal oversight as well as advisory responsibilities, and is obligated to report to Congress on an annual basis. The Chairman and Vice Chairman are subject to Senate confirmation. As constituted by law, I believe—and if confirmed, would recommend—that the Board would be well served to consult with knowledgeable and concerned parties inside and outside of government and engage in meaningful public outreach activities. Accordingly, I do view the Privacy Board as more than a private sounding board for the President.

### SUBMISSIONS FOR THE RECORD

# STATEMENT OF SENATOR JOHN CORNYN Before the United States Senate Committee on Judiciary Executive Nominations November 8, 2005

The Committee will come to order.

I want to thank Chairman Specter for scheduling today's hearing. This hearing involves two very important positions recently created by the Congress. The Privacy & Civil Liberties Oversight Board was created based on recommendation of the 9/11 Commission and is designed to oversee our government's commitment to defend civil liberties. As the chair and vice chair of this Board, you both will fill vital positions within our government. I hope we can get your nominations voted out of the Committee - and through the Senate - as soon as possible.

#### Introduction

As a country, we cherish our civil liberties and are committed to vigorously defend them, to ensure that we maintain our way of life. Congress works hard to strike both a careful and wise balance between national security and civil liberties. While this is not always easy, I believe we do so with the best interests of our nation in mind -- and we do so in a manner that is both honest and in good faith.

That is why I am disappointed when we witness false reports or scare tactics about phantom civil rights violations. False reports and scare tactics serve no legitimate cause — but they do a grave disservice to the American people. The war on terrorism must be fought aggressively — but *consistent* with the protection of civil rights and civil liberties. Whenever <u>real</u> civil liberties problems do arise, we must learn about them right away, so that we can fix them swiftly.

Every false allegation undermines every true allegation, and that hurts us all. If anything, false claims about civil liberties violations actually make it harder to monitor real civil liberties issues in the future – for the same reason that eventually no one listened to the fabled little boy who "cried wolf." That is why I encourage <a href="https://example.com/honest, responsible, and fair">honest, responsible, and fair</a> discussions about the war on terrorism, civil liberties, and the USA PATRIOT Act.

The Privacy & Civil Liberties Oversight Board will play an important role in this debate. Both of you will be expected to give honest, responsible and fair review of the development and implementation of laws, regulations, and executive branch policies related to efforts to protect the Nation against terrorism, and you will also be expected to ensure that concerns with respect to privacy and civil liberties are appropriately considered. And I stand prepared to work with you to ensure that this is done.

#### Nominees

#### Carol Dinkins

We have two very distinguished nominees today. Carol Dinkins is the President's nominee to Chair the Privacy & Civil Liberties Oversight Board. Ms. Dinkins comes to this position with substantial public service and private-sector experience. She has previously served as the Deputy Attorney General under former President Reagan, the second-highest ranking position in the Department of Justice. As deputy attorney general, Ms. Dinkins was responsible for the day-to-day management of the Justice Department's more than 60,000 employees. She has also previously served as the Assistant Attorney General for the Environment and Natural Resources Division. Ms. Dinkins has been a long-time partner in the distinguished Texas law firm of Vinson & Elkins.

Additionally, Ms. Dinkins has devoted a substantial amount of her time to a variety of public service initiatives. She is active in the American Bar Association having become a member of their Board of Governors this past August. She has also previously served as the chair of the ABA Standing Committee on the Federal Judiciary, among the many assignments she has carried out for the ABA. Ms. Dinkins has also served in various capacities in her local bar association and has donated significant time to activities designed to protect the environment.

Ms. Dinkins will bring a wealth of practical experience to this position.

#### Alan Raul

Alan Raul is the President's nominee to serve as the Vice Chair of the Privacy & Civil Liberties Oversight Board. He is a Partner in the prestigious Washington, D.C. office of the international law firm of Sidley Austin Brown & Wood and he, too, brings substantial public service and private-sector experience.

Mr. Raul has previously served in the White House as Associate Counsel to President Reagan. He has also served as the General Counsel of the Office of Management and Budget, and as General Counsel of the U.S. Department of Agriculture.

His past experience will serve him well in this position.

Welcome to both of you today.

## United States Senate

WASHINGTON, DC 20510

May 11, 2005

Andrew H. Card, Jr. Chief of Staff The White House 1600 Pennsylvania Avenue, NW Washington, DC 20500

Dear Mr. Card:

On December 17, 2004, the President signed into law the Intelligence Reform and Terrorism Prevention Act of 2004 (P.L. 108-458). This historic legislation reorganized the intelligence community for the first time in more than 50 years.

In response to the 9/11 Commission's recommendation, Section 1061 of this Act established a Privacy and Civil Liberties Oversight Board in the Executive Office of the President. The Board is to ensure that privacy and civil liberties concerns are appropriately considered in the Executive Branch's implementation of all laws, regulations, policies, and procedures related to efforts to protect the Nation against terrorism. Further, the Board is empowered to advise Executive Branch agencies in their development of all such regulations, policies, and procedures.

We would appreciate if you would provide us with an update on the implementation of Section 1061. In particular, please inform us of the timeline and milestones for establishing the Board, including appointing Board members, hiring an Executive Director and other staff, and securing office space. We are concerned that, as of the date of this letter, the Chairman and the Vice Chairman of the Board have not been nominated. We urge that this be done as quickly as possible so the Board's important work can begin.

In addition, the Board's proposed budget for Fiscal Year 2006 is only \$750,000. We are concerned that this is an inadequate level of funding for the Board to carry out its broad statutory mandate. By way of comparison, the proposed budgets for other offices within the Executive Office of the President are \$4 million for the Council of Economic Advisors, \$24 million for the Office of Drug Control Policy, \$6 million for the Office of Science and Technology Policy, and \$39 million for the Office of the United States Trade Representative. In addition, the Department of Homeland Security's Officer for Civil Rights and Civil Liberties, who is charged with addressing civil liberties issues facing one department, not the entire Executive Branch, has a proposed budget of \$13 million.

Please provide us with details of the proposed budget for the Board and describe how the Board will set up a new office, hire the requisite staff, carry out its statutory mandates, and otherwise function effectively with this level of funding. Please inform us how many Full-Time Equivalents will be dedicated to the Board and its staff.

As the 9/11 Commission made clear, a strong and independent Privacy and Civil Liberties Oversight Board is a critical component of the enhanced system of checks and balances needed to protect the precious liberties that are vital to our way of life. Accordingly, we urge the White House to take the steps necessary to allow the Board to begin functioning effectively as soon as possible.

Thank you for your time and consideration.

Sincerely,

Richard J. Durbin

United States Senator

Joseph L. Lieberman United States Senator Susan M. Collins United States Senator

Patrick J. Leahy
United States Senator

#### Statement Of Senator Patrick Leahy, Ranking Member Senate Judiciary Committee Hearing on "Executive Nominations" To The Privacy And Civil Liberties Oversight Board November 8, 2005

Mr. Chairman, today we consider nominees to fill the important posts of Chair and Vice Chair of the Privacy and Civil Liberties Oversight Board. Filling these positions is long overdue. On December 14, 2004, the President signed into law the Intelligence Reform and Terrorism Prevention Act of 2004. Section 1061 of this Act implemented a 9/11 Commission recommendation to establish an independent board within the Executive Office of the President to fill a clear void in government structure for protecting our liberties.

Creating the Board was no easy feat. First, the Administration tried to defuse the 9/11 Commission's recommendation for a Privacy Board by pointing to previous purported efforts to protect privacy and civil liberties. Against the backdrop of secretive data mining efforts and resistance to Congressional oversight of Executive Branch use of invasive powers, this was not persuasive. The Administration then tried to circumvent a congressionally authorized, independent board by issuing an Executive Order establishing an anemic alternative. That entity was not independent, had no authority to access information, had little accountability and was comprised solely of Administration officials from the law enforcement and intelligence communities -- the very communities in need of oversight. It was the proverbial case of the fox guarding the henhouse. But many of us in Congress were committed to creating an effective Board in keeping with the 9/11 Commission's recommendations.

But that was almost a year ago, and the delay in filling these positions has concerned me. Earlier this year on May 11, I joined Senators Durbin, Collins and Lieberman in writing to the President urging him to nominate Board members as soon as possible. We also expressed concern about the inadequate funding in the White House Budget proposal, which would only have provided an underwhelming and insufficient \$750,000 for its operations. Fortunately, the Transportation, Treasury and HUD Appropriations Subcommittee, on which I serve, has raised the amount to \$1.5 million to ensure a better start for the Board, although more resources will undoubtedly be needed for the Board to properly do its work as Congress envisioned. Regrettably, as the Washington Post recently reported, the delays and insufficient funds suggest that perhaps the Administration is simply going through the motions, rather than following through on a meaningful commitment to the Privacy Board and its role and responsibilities.

This Board is too important for us to simply go through the motions. Prior to the Board, there was no office within the government to oversee the collective impact of government actions and powers on our liberties. This is a critical blind spot. We have increased and consolidated the authority of an already-powerful government in an effort to address the realities of terrorism and modern warfare. Soon we will be conferencing on the renewed Patriot Act to solidify the government's powers further. As Lee Hamilton, Vice

Chairman of the 9/11 Commission, noted in a Judiciary Committee hearing on August 19, 2004, these developments represent "an astounding intrusion in the lives of ordinary Americans that is routine today in government."

It is regrettable that only two of the Board's positions – the Chairman and Vice Chairman – are Senate-confirmed, minimizing Congress's opportunities to ensure Board members' suitability for this important work. I am also somewhat concerned that one of our nominees' expertise appears to be in environmental and energy law, rather than in privacy law.

It is important that any nominee we confirm for this Board have the ability to think critically and independently about the policies we implement as a Nation and about how they affect our fundamental rights. It is expected that Board members will participate in the policymaking process, review technology choices and options, peer into various agencies and asses's actions, review classified materials and investigate concerns. Board members must have the versatility to work closely with government officials, but at the same time be sufficiently independent to push for the full story and assess those government policies without fear, favor or compromise. Board members will also need to choose capable investigative staff to assist them in carrying out these duties.

It is also very important that Board members have a good understanding of technology and how those tools can help protect our nation, as well as how inappropriate use or lack of foresight and planning can undermine the very values and freedoms these tools are supposed to secure. We are in an era in which advanced technologies have opened up new possibilities that even a few years ago seemed out of reach. We now face the prospect of tracking devices like RFID chips integrated in identification documents. For example, the new U.S. passports will include those chips to store sensitive personal data and reserve space for biometrics like fingerprints and iris scans. Other advances include the rapid collection, sharing and analyzing of large amounts of data previously unavailable without great effort, if at all. These powerful tools have enhanced our law enforcement and homeland security efforts, as well as made our lives more convenient and enjoyable. But they also pose significant challenges to our liberties and to our privacy.

In executing their responsibilities, I would caution the nominees, if they are confirmed, to keep in mind the guidance of the 9/11 Commission: The "burden of proof for retaining a particular governmental power should be on the Executive, to explain (a) that the power actually materially enhances security and (b) that there is adequate supervision of the Executive's use of the powers to ensure protection of civil liberties. If the power is granted, there must be adequate guidelines and oversight to properly confine its use."

Security and liberty are always in tension in a free society, and that is readily apparent today. It is our vigilant duty to work hard at striking the right balance, since the success of one is essential to the other. As the 9-11 Commission noted, "[t]his balancing is no easy task, but we must constantly strive to keep it right."

I look forward to hearing from our two nominees about their experience and plans to meet these important responsibilities.

I ask unanimous consent that the May 11, 2005, letter to the President about the Privacy and Civil Liberties Board and the August 8, 2005, Washington Post article, "Civil Liberties Panel Is Off to a Sluggish Start," be included in the record.

#####

washingtonpost.com

Civil Liberties Panel Is Off to a Sluggish Start Critics Decry Administration's Lack of Urgency

By Caroline Drees Reuters Monday, August 8, 2005; Al3

A civil liberties board ordered by Congress last year has never met to discuss its job of protecting rights in the fight against terrorism, and critics say it is a toothless, under-funded shell with inadequate support from President Bush.

Lawmakers including some Republicans, civil rights advocates, a member of the Sept. 11 commission and a member of the Privacy and Civil Liberties Oversight Board have expressed concerns.

Lanny Davis, the only well-known liberal among the five people Bush nominated after a six-month delay, said he had not received a call from anyone related to the board since it was formally announced in June. Davis said he could not comment on specifics because the members had not yet met.

All four other panel members declined to comment.

The inactivity comes as Congress is about to reauthorize several provisions of the USA Patriot Act, which gave the government new powers to go after suspected terrorists.

Asked why it was taking so long to set the board up, Rep. Christopher Shays (R-Conn.) said, "It's not a priority for the administration."

The intelligence reform law of December 2004 called for the oversight board in response to a recommendation from the Sept. 11 commission, which feared that increased governmental powers needed to fight terrorism could erode civil liberties.

Top White House officials have said the board would address those concerns, and get the resources needed to do the job.

But almost eight months after its inception, critics say the panel still exists only on paper, and lacks the money, power and presidential backing to ensure the entire government respects Americans' rights.

The Bush-appointed panel "is a very watered-down board without the kinds of powers which I believe are necessary to provide credibility and authority, such as independent subpoena power . . and a bipartisan process in selection," said Richard Ben-Veniste, a member of the Sept. 11 commission.

"We don't think the board serves as a credible watchdog," said Tim Edgar, national security policy counsel at the American Civil Liberties Union.

One frequent complaint concerns the board's budget. Bush requested \$750,000, which Congress doubled to \$1.5 million.

The Department of Homeland Security's privacy office, with a similar mission limited to that department, has about a \$13 million budget, said Rep. Bennie Thompson (Miss.), the top Democrat on the House Homeland Security Committee.

"I don't think you can do it for a million and a half," Shays said.

Critics, including Thompson, also ask why it took Bush half a year to nominate the five board members when the administration acted much faster to implement other, more complex parts of the 2004 law. The Senate must still confirm the chairman and vice chairman after it returns from its summer recess.

Shays, Rep. Carolyn B. Maloney (D-N.Y.) and other lawmakers have proposed an amendment granting the panel greater independence and powers, including subpoena authority.

Right now, Maloney said, "it does not have teeth. It does not have enforcement. It does not have strength behind it."

Asked for comment, the White House sent a copy of a June letter to Sens. Susan Collins (R-Maine) and Joseph I. Lieberman (D-Conn.) that said it would ensure the board had the resources to fulfill its mission and would reexamine the issue once the panel was up and running.

The two senators had written to the White House expressing concerns about the board's budget, as well as delays in setting it up and implementing other parts of the 2004 law.

"As we work to make America safer, it is equally important that we are careful to preserve the very liberties that we seek to protect," Collins said in an interview. "The board is critical in this regard."

Mary Fetchet, whose son died in the World Trade Center on Sept. 11, 2001, criticized the slow pace. "I am really shocked that in many instances in Washington I feel that there's this attempt to go back to the status quo, while I feel there should be a sense of urgency," she said.

 $\bigcirc$