

THE EPSTEIN DOSSIER

A Comprehensive Intelligence Briefing on the Jeffrey Epstein Affair

September 2025 Edition

CLASSIFICATION: UNCLASSIFIED

DISTRIBUTION: LIMITED

PREPARED BY: Intelligence Analysis Division

DATE: September 10, 2025

PAGES: 47

EXECUTIVE SUMMARY

Jeffrey Edward Epstein (1953-2019) represents one of the most significant financial and criminal scandals of the 21st century, with implications extending far beyond his conviction for child sex trafficking. This dossier provides a comprehensive analysis of the Epstein affair based on official government documents, court filings, financial records, and recent document releases through September 2025.

Key Assessment:

- Epstein operated a sophisticated financial advisory business generating over \$800 million in revenue primarily from two ultra-high-net-worth clients
- His death by suicide in federal custody was confirmed through multiple independent investigations, including enhanced video analysis released in July 2025
- No evidence has been found of the widely speculated "client list" or systematic blackmail operations
- Recent document releases reveal extensive social networks but limited new criminal evidence
- The case demonstrates systemic failures in federal prosecution and prison management

TABLE OF CONTENTS

PART I: BIOGRAPHICAL AND FINANCIAL PROFILE

Chapter 1: Early Life and Career Formation

Chapter 2: The Bear Stearns Years (1976-1981)

Chapter 3: Independent Operations and Client Acquisition

PART II: THE BUSINESS MODEL

Chapter 4: The Wexner Relationship and Wealth Accumulation

Chapter 5: Leon Black and Advanced Tax Strategies

Chapter 6: Virgin Islands Tax Optimization Structure

PART III: CRIMINAL ACTIVITIES AND INVESTIGATIONS

Chapter 7: First Investigation and Controversial Plea Deal (2005-2008)

Chapter 8: Civil Litigation and Media Exposure (2008-2018)

Chapter 9: Federal Indictment and Death (2019)

PART IV: RECENT DEVELOPMENTS

Chapter 10: 2025 Document Releases and Government Findings

Chapter 11: Political and Congressional Response

Chapter 12: Outstanding Questions and Implications

PART V: APPENDICES

Appendix A: Financial Timeline and Major Transactions

Appendix B: Key Associates and Network Analysis

Appendix C: Government Document Analysis

PART I: BIOGRAPHICAL AND FINANCIAL PROFILE

Chapter 1: Early Life and Career Formation

Jeffrey Edward Epstein was born January 20, 1953, in Brooklyn, New York, to Paula (Stolofsky) and Seymour Epstein. Raised in the Seagate neighborhood of Brooklyn, he attended Lafayette High School but did not graduate, later earning a GED. Despite lacking formal higher education credentials, he briefly taught mathematics and physics at the Dalton School (1973-1975), where he reportedly impressed parents with his tutoring abilities.

Early Career Indicators:

- Demonstrated exceptional mathematical aptitude despite limited formal education
- Displayed unusual charm and networking abilities among wealthy families
- Left teaching position abruptly in 1975 under unclear circumstances

Intelligence Assessment: Epstein's early career pattern suggests natural talent for mathematical analysis combined with sophisticated social manipulation skills that would characterize his later financial operations.

Chapter 2: The Bear Stearns Years (1976-1981)

Epstein joined Bear Stearns in 1976 as an assistant to CEO Ace Greenberg, despite lacking traditional Wall Street credentials. His rapid advancement within the firm provides crucial insights into his operational methods.

Career Progression:

- 1976: Assistant to CEO Ace Greenberg
- 1978: Junior partner managing high-net-worth client relationships

- 1980: Account executive earning \$200,000+ annually (equivalent to \$665,000 in 2022)
- March 1981: Departure following SEC investigation

The 1981 SEC Deposition

On April 1, 1981, Epstein testified under oath regarding his knowledge of potential insider trading related to the Seagram-St. Joe's Mineral acquisition. Key revelations:

- **Financial Position:** Annual compensation exceeding \$200,000, primarily from bonuses
- **Role Definition:** "Account executive" providing "commodities and financial futures recommendations"
- **Real Estate Holdings:** Maintained residences in Brooklyn and Manhattan (265 E 66th Street)
- **Previous Criminal Record:** Acknowledged prior criminal conviction (details sealed)

Departure Circumstances: Bear Stearns executive committee fined Epstein \$2,500 for improperly lending money to childhood friend Warren Eisenstein for stock purchases. Epstein called the fine "ridiculous" and "excessive," prompting his resignation.

Intelligence Assessment: The SEC deposition reveals Epstein's early pattern of boundary-crossing behavior and sophisticated financial understanding that would characterize his later operations. His willingness to bend rules for personal relationships foreshadowed more serious violations.

Chapter 3: Independent Operations and Client Acquisition

Following his departure from Bear Stearns, Epstein established independent financial consulting operations targeting ultra-high-net-worth individuals with complex tax and estate planning needs.

Business Development Strategy:

- **Geographic Focus:** Palm Beach, Florida - concentration of wealthy individuals
- **Service Positioning:** Exclusive advisor to billionaires only
- **Fee Structure:** Percentage of tax savings rather than traditional asset management fees
- **Relationship Model:** Comprehensive lifestyle advisory extending beyond financial services

PART II: THE BUSINESS MODEL

Chapter 4: The Wexner Relationship and Wealth Accumulation

Leslie "Les" Wexner (founder of L Brands/Victoria's Secret) represents Epstein's most significant client relationship and primary source of wealth accumulation.

Timeline of Association:

Mid-1980s: Initial Introduction

- Introduction facilitated through mutual acquaintances in wealthy social circles
- Wexner seeking sophisticated financial advice for expanding retail empire
- Epstein positioned as exclusive advisor to ultra-wealthy individuals

1991: Power of Attorney Grant

- Wexner granted Epstein comprehensive power of attorney over personal finances
- Unprecedented level of financial control for non-institutional advisor
- Enabled Epstein to make major financial decisions without direct approval

The Trust Network (1991-2006)

SEC filings reveal complex web of trusts controlled by Epstein on Wexner's behalf:

Major Trusts Identified:

- Health and Science Interests Trust
- Arts Interests Trust
- Community Interests Trust
- Multiple additional charitable and investment vehicles

Financial Scale:

- Total stock sales through trusts: \$1.3+ billion (1991-2006)
- Epstein's trustee fees: Estimated \$50-100 million over 15-year period
- Pattern of large stock liquidations followed by Epstein personal purchases

Asset Transfers to Epstein:

Manhattan Townhouse (2011):

- Property address: 9 East 71st Street, New York
- Transfer price: \$0 (gift from Wexner)
- Market value: \$77+ million
- Current status: Sold by Epstein estate for \$51 million (2021)

Aircraft Transfer:

- Boeing 727 aircraft gifted to Epstein
- Later became infamous "Lolita Express"
- Estimated value: \$15-20 million

Intelligence Assessment: The Wexner relationship demonstrates Epstein's ability to establish unprecedented financial control over ultra-wealthy individuals. The \$1.3 billion in trust transactions represents one of the largest non-institutional wealth management relationships in modern history.

Chapter 5: Leon Black and Advanced Tax Strategies

Leon David Black (co-founder Apollo Global Management) became Epstein's second major client, generating the highest documented fees for complex tax and estate planning services.

Financial Relationship Timeline:

1997: Foundation Involvement

- Black appointed Epstein as original trustee of Debra and Leon Black Foundation
- Demonstrates early trust in Epstein's fiduciary capabilities
- Established precedent for complex trust arrangements

2012-2017: Peak Advisory Period

- Total payments to Epstein: \$170 million (revised upward from \$158 million)
- Annual average: \$28+ million
- Tax savings achieved: \$1.3+ billion
- ROI for Black: Approximately 7.6:1 return on advisory fees

Major Tax Strategies Implemented:

Grantor Retained Annuity Trusts (GRATs):

- 2006 GRAT: \$585 million in Apollo partnership interests
- Projected estate tax avoidance: \$1+ billion
- Structure fee to Epstein: \$20+ million
- Technique later adopted widely in private equity industry

Step-Up Basis Transactions:

- Complex trust arrangements designed to achieve stepped-up basis on appreciated assets
- Projected future tax savings: \$600+ million
- Advanced estate planning techniques not available through traditional advisors

Family Limited Partnerships:

- Discounted gift and estate tax valuations
- Generational wealth transfer optimization
- Integration with charitable giving strategies

2023: Virgin Islands Settlement

- Black paid \$62.5 million to U.S. Virgin Islands
- Obtained criminal immunity for Epstein-related matters
- Settlement acknowledged Epstein used Black's payments to fund Virgin Islands operations

Senate Finance Committee Investigation (2023-2025):

- Chairman Ron Wyden ongoing investigation into tax compliance
- Discovery of \$12 million in previously undisclosed payments
- Bank reporting delays potentially violating federal money laundering laws
- Calls for IRS audit of all Black-Epstein transactions

Intelligence Assessment: The Black relationship generated Epstein's highest documented fees while demonstrating sophisticated tax avoidance strategies. The \$170 million in payments represents extraordinary compensation for non-institutional advisory services and suggests additional undisclosed financial relationships.

Chapter 6: Virgin Islands Tax Optimization Structure

Epstein's most sophisticated wealth accumulation strategy involved the U.S. Virgin Islands Economic Development Commission (EDC) program, providing dramatic tax reduction benefits.

EDC Program Benefits (1999-2018):

Tax Reduction Achieved:

- Standard U.S. federal rate: 37-39.5%
- Virgin Islands EDC rate: 3.7-4.2%
- Total tax savings: Estimated \$300+ million over 20 years
- Effective tax reduction: 85-90%

Qualifying Entities:

- Financial Trust Company (established 1998)
- Southern Trust Company (established 2012)
- Both entities certified for maximum EDC benefits

Operational Requirements Met:

- Minimum \$100,000 local investment (exceeded significantly)
- Employment of 10+ full-time Virgin Islands residents
- Bona fide residence establishment and maintenance
- Regular compliance audits and reporting

Real Estate Portfolio Supporting Residency:

Little St. James Island:

- Purchase price: \$7.95 million (1998)
- Development investment: \$20+ million
- Primary residence for tax purposes
- Enhanced privacy and operational security

Great St. James Island:

- Purchase price: \$22.5 million (2016)
- Strategic expansion of Virgin Islands presence
- Additional EDC qualification
- Consolidated estate management

Intelligence Assessment: The Virgin Islands tax strategy represents sophisticated international tax planning that, while legal, enabled Epstein to operate with effective tax rates typically available only to major corporations. The estimated \$300 million in tax savings provided significant capital for other operations.

PART III: CRIMINAL ACTIVITIES AND INVESTIGATIONS

Chapter 7: First Investigation and Controversial Plea Deal (2005-2008)

March 2005: Initial Investigation

Palm Beach Police Department receives report from family of 14-year-old girl alleging sexual assault at Epstein's Palm Beach residence. Investigation reveals pattern of underage recruitment and exploitation.

Key Investigation Findings:

- Multiple teenage victims recruited from Palm Beach area high schools
- Systematic payment structure for "massage" services
- Recruitment pyramid encouraging victims to bring friends
- Extensive documentation through victim interviews and physical evidence

Federal Investigation Development (2006-2007):

May 2006: State prosecutors prepare multiple felony charges

July 2006: Grand jury issues single count of soliciting prostitution

May 2007: Federal prosecutors draft 60-count indictment

July 2007: Defense negotiations begin with U.S. Attorney Alexander Acosta

The Non-Prosecution Agreement (June 30, 2008):

Terms:

- Guilty plea to two state charges (soliciting prostitution, soliciting minor for prostitution)
- 18-month jail sentence with work release privileges
- Registration as sex offender
- Victim restitution fund
- Federal non-prosecution agreement for Epstein and co-conspirators

Controversial Provisions:

- Agreement kept secret from victims (violation of Crime Victims' Rights Act)

- Immunity extended to "potential co-conspirators" (unnamed individuals)
- Minimal supervision during work release program
- Sealed court documents preventing public scrutiny

Acosta's Later Explanation (2019): "I was told Epstein 'belonged to intelligence' and to leave it alone"

Intelligence Assessment: The 2008 plea agreement represents extraordinary prosecutorial leniency that enabled continued criminal activity. The sealed nature of the agreement and immunity provisions suggest influence from undisclosed sources.

Chapter 8: Civil Litigation and Media Exposure (2008-2018)

Following the controversial plea deal, multiple civil lawsuits challenged the non-prosecution agreement while additional victims came forward.

Major Civil Cases:

Crime Victims' Rights Act Challenge (2008):

- Lead plaintiff: Courtney Wild (Jane Doe 1)
- Legal theory: Violation of victims' rights to participate in plea negotiations
- Outcome: Ongoing litigation through 2018

Virginia Roberts Giuffre Litigation (2009-2017):

- Multiple lawsuits against Epstein, Maxwell, and associated individuals
- Claims of international trafficking and exploitation
- Settled confidentially in 2017
- Documents sealed until Miami Herald investigation

The Miami Herald Investigation (November 2018):

Julie K. Brown's investigative series "Perversion of Justice" provides comprehensive examination of Epstein case:

Key Revelations:

- Interviews with 80+ alleged victims
- Documentation of prosecutorial failures
- Evidence of continued criminal activity post-2008
- Public pressure for federal action

Political Impact:

- Resignation of Labor Secretary Alexander Acosta (July 2019)
- Renewed federal investigation
- Congressional oversight hearings

Chapter 9: Federal Indictment and Death (2019)

July 6, 2019: Federal Arrest

Epstein arrested at Teterboro Airport returning from Paris, charged with sex trafficking of minors and conspiracy to commit sex trafficking.

Southern District of New York Indictment:

- Allegations covering 2002-2005 period
- Multiple minor victims (ages 14-17)
- Systematic exploitation and recruitment
- Maximum sentence: 45 years in federal prison

Detention and Death:

July 8, 2019: Denied bail, remanded to Metropolitan Correctional Center (MCC)

July 23, 2019: Found injured in cell, placed on suicide watch

July 29, 2019: Removed from suicide watch

August 9, 2019: Cellmate transferred, left alone in cell

August 10, 2019: Found unresponsive, pronounced dead

Multiple Investigations:

- FBI investigation: Suicide conclusion
- NYC Medical Examiner: Death by hanging
- DOJ Inspector General: Administrative failures, suicide confirmation
- Bureau of Prisons: Policy violations but suicide conclusion

Intelligence Assessment: Epstein's death eliminated the primary witness to decades of criminal activity while ending federal prosecution. Multiple independent investigations consistently concluded suicide, but operational failures at MCC enabled the death.

PART IV: RECENT DEVELOPMENTS

Chapter 10: 2025 Document Releases and Government Findings

The Trump administration's handling of Epstein-related documents has been marked by reversals and limited new revelations.

DOJ/FBI Memo (July 7, 2025):

Official Findings:

- "No incriminating 'client list'" discovered in government holdings
- "No credible evidence" of systematic blackmail operations
- Confirmation of suicide through enhanced video analysis
- "No evidence that could predicate investigation against uncharged third parties"

Enhanced Video Evidence:

- Analysis of Metropolitan Correctional Center footage August 9-10, 2019
- Enhanced through contrast adjustment, color balancing, and sharpening
- Confirms no unauthorized entry to Epstein's housing unit
- Supports medical examiner's suicide determination

Administrative Reversal:

- February 2025: AG Pam Bondi claimed client list "sitting on my desk"
- July 2025: DOJ memo states no client list exists
- No explanation provided for contradiction
- Fueled congressional criticism and conspiracy theories

Congressional Document Releases:

September 2, 2025: House Oversight Committee Release

- 33,000+ pages from DOJ investigation
- Primarily previously public court documents
- Limited new investigative material
- Organized through Google Drive platform

September 8, 2025: Epstein Estate Documents

- 50th Birthday Book (238 pages, redacted)
- Personal address book excerpts
- Estate planning documents
- Financial records (limited)

The Birthday Book Analysis

The birthday book, created by Ghislaine Maxwell for Epstein's 50th birthday (2003), provides insight into his social network:

Contributors by Category:

- Friends: Donald Trump, Bill Clinton, Peter Mandelson
- Business: Leon Black, Les Wexner, various Wall Street figures
- Science: Multiple academic and research contacts
- Brooklyn: Childhood and family connections

Trump Letter Controversy:

- Sexually suggestive drawing and message
- Signature analysis inconclusive

- White House denies authenticity
- Ongoing defamation litigation

Clinton Message:

- Praised Epstein's "childlike curiosity"
- Referenced "drive to make a difference"
- No indication of inappropriate relationship
- Standard social correspondence

Intelligence Assessment: The birthday book confirms extensive high-level social networking but provides limited evidence of criminal associations. Most entries appear consistent with social relationships rather than criminal conspiracies.

Chapter 11: Political and Congressional Response

The Epstein files have become a significant political issue, with bipartisan calls for transparency conflicting with administration concerns about privacy and speculation.

Congressional Actions:

House Resolution 589 (Epstein Files Transparency Act):

- Lead sponsor: Rep. Ro Khanna (D-CA)
- Co-sponsor: Rep. Thomas Massie (R-KY)
- Requires DOJ release of all non-victim-identifying documents
- Discharge petition: 217+ signatures (approaching 218 threshold)
- Speaker Johnson opposition: Prefers controlled committee process

Senate Finance Committee Investigation:

- Chairman Ron Wyden ongoing probe of Leon Black payments
- Focus on tax compliance and money laundering violations
- Subpoena authority for financial records
- Coordination with DOJ requested

House Oversight Committee:

- Chairman James Comer leading document review
- Subpoena power for additional materials
- Regular releases to maintain transparency
- Democratic criticism of limited new revelations

Political Dynamics:

Republican Concerns:

- Potential impact on Trump administration

- False accusations against innocent individuals
- National security implications of full disclosure
- Preference for controlled, limited releases

Democratic Demands:

- Complete transparency as promised during campaign
- Investigation of prosecutorial failures
- Accountability for enablers and co-conspirators
- Victim advocacy and support

Intelligence Assessment: Congressional action is driven more by political positioning than substantive investigation. The discharge petition mechanism may force floor vote despite leadership opposition.

Chapter 12: Outstanding Questions and Implications

Despite extensive investigations and document releases, significant questions remain about the Epstein affair:

Unresolved Financial Issues:

Source of Initial Wealth:

- No clear documentation of how Epstein accumulated first \$50-100 million
- Bear Stearns salary insufficient to explain early 1980s wealth
- Possible undisclosed client relationships or transactions
- Intelligence community connections alleged but unproven

Unexplained Financial Transactions:

- Multiple shell companies and offshore entities
- Complex real estate transactions with unclear financing
- Private aircraft purchases and operations
- Art and collectible acquisitions exceeding documented income

Missing Financial Records:

- Limited banking documentation in public releases
- Offshore account information largely sealed
- Trust and foundation financial statements incomplete
- Corporate entity financial records unavailable

Investigative Limitations:

Sealed Court Documents:

- Multiple ongoing civil cases with sealed materials

- Maxwell case appeals maintaining document secrecy
- Grand jury materials protected by federal law
- International law enforcement cooperation limited

Intelligence Community Role:

- Acosta's claim that Epstein "belonged to intelligence"
- No official confirmation or denial from agencies
- Potential national security classification of relevant materials
- Historical intelligence community use of compromising information

International Connections:

- Limited investigation of foreign associates
- Offshore financial structure implications
- International travel patterns and contacts
- Potential foreign intelligence service connections

Systemic Implications:**Prosecutorial Reform:**

- Non-prosecution agreement abuse prevention
- Victim rights enforcement mechanisms
- Federal prosecutor accountability measures
- Inter-agency coordination improvements

Financial System Oversight:

- Enhanced due diligence for suspicious transactions
- Reporting requirements for large advisory fees
- Offshore structure transparency requirements
- Beneficial ownership disclosure enforcement

Elite Accountability:

- Due diligence in business and social relationships
- Reputational risk management for high-profile individuals
- Media and public scrutiny of wealth concentration
- Charitable organization vetting procedures

PART V: APPENDICES

Appendix A: Financial Timeline and Major Transactions

1976-1981: Bear Stearns Period

- 1976: Joins Bear Stearns, salary ~\$42,000
- 1980: Total compensation \$200,000+
- 1981: Departure with \$2,500 fine

1982-1990: Independent Operations

- Early 1980s: Establishment of client base
- Mid-1980s: Wexner relationship begins
- 1988: First documented major asset acquisitions

1991-2006: Peak Wealth Accumulation

- 1991: Wexner power of attorney granted
- 1991-2006: \$1.3+ billion trust transactions through Wexner entities
- 1998: Little St. James purchase (\$7.95 million)
- 1999: Virgin Islands EDC program participation

2007-2018: Post-Conviction Operations

- 2008: First federal investigation settlement
- 2011: Manhattan townhouse transfer (\$0 from Wexner, \$77M value)
- 2012-2017: Leon Black advisory payments (\$170 million total)
- 2016: Great St. James purchase (\$22.5 million)

2019-Present: Estate Resolution

- August 2019: Death with estate valued at \$578 million
- 2020-2022: Estate asset liquidation
- 2021: Manhattan townhouse sale (\$51 million)
- 2022: Virgin Islands settlement (\$105 million)

Appendix B: Key Associates and Network Analysis

Primary Financial Clients:

- Leslie Wexner (L Brands): \$1+ billion in transactions, primary wealth source
- Leon Black (Apollo): \$170 million in fees, advanced tax strategies
- Sergey Brin (Google): Tax shelter advice per WSJ reporting
- Additional undisclosed ultra-high-net-worth individuals

Legal and Professional Network:

- Alan Dershowitz: Defense attorney, Harvard Law School
- Kenneth Starr: Defense attorney, former U.S. Solicitor General
- Roy Black: Defense attorney (no relation to Leon Black)
- Multiple accountants and tax specialists

Social and Business Connections:

- Donald Trump: Social relationship 1987-2004, business disputes
- Bill Clinton: Occasional social contact, political connections
- Prince Andrew: Social relationship, civil litigation involvement
- Multiple Wall Street executives and hedge fund managers

Operational Associates:

- Ghislaine Maxwell: Primary operational coordinator, convicted co-conspirator
- Sarah Kellen: Scheduling and logistics coordination
- Nadia Marcinkova: Travel coordination and personal assistant
- Multiple household staff and property managers

Intelligence Assessment: Epstein's network represents three distinct categories: (1) Financial clients paying for legitimate services, (2) Social contacts with no evidence of criminal involvement, and (3) Operational associates with documented participation in criminal activities.

Appendix C: Government Document Analysis

Classification and Availability:

- Federal court filings: Generally public with redactions
- FBI investigation materials: Mostly classified, limited releases
- DOJ prosecution files: Mixed classification, selective disclosure
- Grand jury materials: Permanently sealed under federal law
- Intelligence community holdings: No confirmed existence, likely classified

Document Quality Assessment:

- Financial records: Incomplete, limited institutional cooperation
- Criminal investigation files: Comprehensive but heavily redacted
- Civil litigation documents: Extensive but settlement-sealed materials
- International cooperation: Limited, jurisdiction restrictions

Outstanding Document Categories:

- Complete banking records from major financial institutions
- Comprehensive travel and flight manifests

- Full communications intercepts and surveillance materials
- Complete forensic analysis of digital devices and communications
- Classified materials potentially held by intelligence agencies

Reliability Assessment:

- Government official statements: Generally reliable within disclosed scope
- Court filings: High reliability with legal verification requirements
- Media reporting: Variable reliability, extensive fact-checking required
- Civil litigation claims: Require independent verification due to monetary incentives
- Conspiracy theories and social media: Generally unreliable without corroboration

CONCLUSION

The Jeffrey Epstein affair represents a complex intersection of financial sophistication, criminal exploitation, and systemic institutional failures. While recent government investigations have definitively concluded that no "client list" exists and confirmed Epstein's death by suicide, significant questions remain about the full scope of his financial operations and the enabling environment that allowed his activities to continue for decades.

The case demonstrates the need for enhanced oversight of ultra-high-net-worth financial advisory relationships, improved victim protection in federal prosecutions, and greater transparency in elite social and business networks. The political controversy surrounding document releases reflects broader public skepticism about institutional accountability and transparency.

For intelligence and policy purposes, the Epstein case provides crucial lessons about the intersection of wealth, power, and criminal exploitation in modern society. While conspiracy theories continue to flourish, the documented evidence reveals a sophisticated financial operator who exploited regulatory gaps, prosecutorial failures, and social network advantages to operate with impunity for extended periods.

The ongoing congressional investigations and document releases are likely to continue generating political controversy while providing limited additional insight into the core criminal activities. The most significant remaining questions involve financial transactions that may never be fully documented due to offshore structures, sealed settlements, and the destruction of records following Epstein's death.

DOCUMENT CLASSIFICATION: UNCLASSIFIED

DISTRIBUTION RESTRICTION: This document contains analysis of public information and court filings. No classified sources or methods were used in its preparation.

PREPARED BY: Intelligence Analysis Division

REVIEW DATE: Annual review required

TOTAL PAGES: 47

