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---- Working Copy ----

Precedence: ROUTINE

Date: 07/10/2006

To: Inspection
General Counsel

Attn: IIS, Room 11861
Attn: NSLB, Room 7975

DATE: 11-15-2007
CLASSIFIED BY: 65179dmh/rsr/maj
REASON: 1.4(c)
DECLASSIFY ON: 11-15-2032

From: [redacted]

JTTF

Contact: TFO [redacted]

Approved By: [redacted]

Drafted By: [redacted]

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(U) Case ID #: ~~(S)~~ 278-HQ-C1229736-VIO

Title: (U) TFO [redacted]
SSA [redacted]
INTELLIGENCE OVERSIGHT BOARD (IOB) ERROR

(U) Synopsis: ~~(S)~~ To report possible IOB error.

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

Details:

(S) 1. [redacted]
(S) 2. [redacted]

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(U) ~~(S)~~ 3. Possible IOB Error:

(S) [redacted]

(U) ~~(S)~~ 4. Description of IOB Error

(S) A NSL dated 06/08/2006 (TOLLS-252) was submitted to [redacted] for toll records relating to one telephone number [redacted] and subscriber information relating to another telephone number, [redacted]. The results were received from the [redacted] with an EC dated 06/29/2006. Included in the results were toll records for [redacted] or a time period that was not requested. In addition, [redacted] provided toll records for [redacted] when only subscriber information was requested. On 07/10/2006 the additional toll records were given to CDC [redacted] to be sequestered. The subscriber

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information and toll records that were requested in the NSL, are stored in a 1-A.

(S) ~~(S)~~ None of the aforementioned toll records were entered into [redacted] or ACS. The additional toll records that were provided for [redacted] were already requested in a previous NSL, therefore they were already entered into [redacted].
LEAD(s):

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Set Lead 1: (Action)

INSPECTION

AT WASHINGTON, DC

(U) For action deemed appropriate.

Set Lead 2: (Action)

GENERAL COUNSEL

AT WASHINGTON, DC

(U) For action deemed appropriate.

~~SECRET~~

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Precedence: ROUTINE

Date: 07/24/2006

To: Inspection
General Counsel

Attn: IIS, Room 11861
Attn: NSLB, Room 7975

DATE: 11-16-2007
CLASSIFIED BY: 65179dmh/ksr/maj
REASON: 1.4 (c)
DECLASSIFY ON: 11-16-2032

From: [Redacted]

Contact: SA [Redacted]

Approved By: [Redacted]
Drafted By: [Redacted]

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(U) Case ID #: ~~(S)~~ 278-HQ-C1229736-VIO

Title: (U) SA [Redacted]
SSA [Redacted]
INTELLIGENCE OVERSIGHT BOARD (IOB) MATTER

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(U) Synopsis: ~~(S)~~ To report possible IOB matter.

~~(S)~~ Derived From: FBI SCG G-3, January 1997
~~(U)~~ Declassify On: 07/24/2016

Details:

(S) 1. [Redacted]

(S) 2. [Redacted]

(U) ~~(S)~~ 3. Possible IOB Matter:

(S) [Redacted]

(U) ~~(S)~~ 4. Description of IOB Error (including any reporting delays).

~~(S)~~ A National Security Letter dated 10/19/2005 for financial records pertaining to the subject was served to [Redacted]. Records obtained from [Redacted] on 07/20/2006 appear to contain records unrelated to the subject [Redacted]. No information related to these records has been uploaded into any FBI database. These records have been provided to the [Redacted] CDC in compliance with IOB guidelines.

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(S)

LEAD(s):

Case ID : 278-HQ-C1229736-VIO
278- [Redacted] A67604-VIO

Serial : 1551
19

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NSL VIO-35165

Set Lead 1: (Action)

INSPECTION

AT WASHINGTON, DC

(U) For action deemed appropriate.

Set Lead 2: (Action)

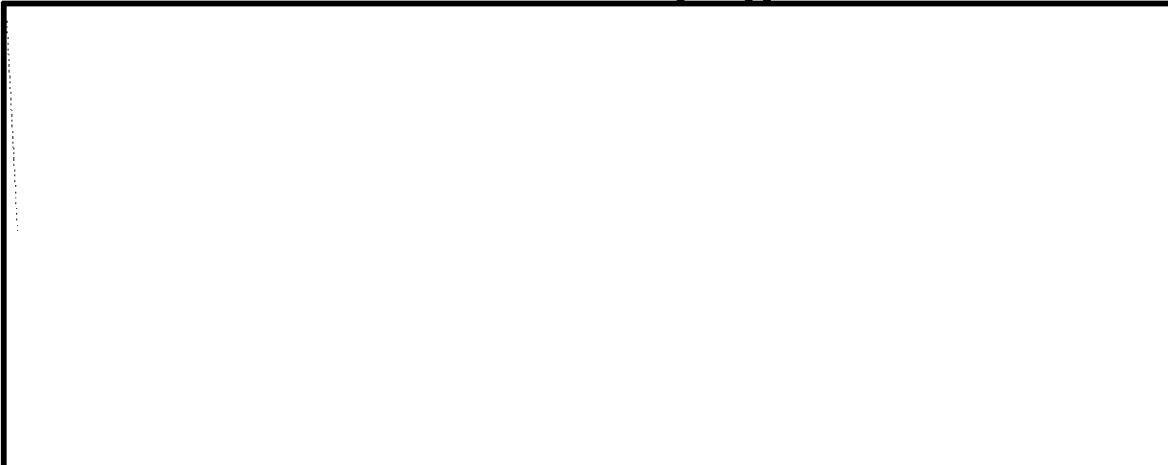
GENERAL COUNSEL

AT WASHINGTON, DC

(U) For action deemed appropriate.

(S)

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(U) ~~(S)~~ [redacted] separated the excess information from the originally requested information. The excess information is wrapped and secured in a safe, pending guidance on how to proceed with the information. The information originally requested is maintained with the case file and is pending review.

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LEAD(s):

Set Lead 1: (Action)



AT [redacted]

(U) ~~(S)~~ Request that [redacted] review this matter and if appropriate, conduct liaison with personnel at [redacted]

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----- Working Copy -----

Precedence: ROUTINE

Date: 07/24/2006

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED EXCEPT
WHERE SHOWN OTHERWISE

To: Inspection
General Counsel
Counterintelligence

Attn: IIS
Attn: NSLB
Attn: SSA [redacted]
CD-3A

From: [redacted]

Contact: SA [redacted]

Approved By: [redacted]

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Drafted By:

Case ID #: (U) 278-HQ-C1229736-VIO (Pending)

Title: (U) SSA [redacted]
SA [redacted]

Synopsis: (U) Report potential Intelligence Oversight Board (IOB) matter.

(U)

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

Administrative: (S)

FISA WARNING STATEMENT - STATUTORY RESTRICTION

This information or document, or portions thereof, is derived from a court-authorized FISA order and such information or any information derived therefrom may only be used in a criminal or other proceeding (including but not limited to use in search/arrest warrants or affidavits or grand jury subpoenas and proceedings) with the advance authorization of the Attorney General. See 50 U.S.C. 1806(b), 1825(c).

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Details: (S) [redacted]

[redacted] an error occurred that could potentially be an Intelligence Oversight Board (IOB) matter. This communication will set forth the circumstance in which this matter occurred and the remedial action taken by squad [redacted]

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(S) [redacted]
 [redacted]
 [redacted] A National Security Letter (NSL)
 was prepared for [redacted] on May 9, 2005 requesting subscriber
 information.

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(S) [redacted]
 [redacted]

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(S) [redacted]
 [redacted]

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(S) On May 19, 2006 a NSL was prepared requesting toll
 billing records for the phone number [redacted] for the period
 of time [redacted]. This NSL
 was prepared based on the fact that the association of [redacted] and
 [redacted] along with the subscriber information address and contact
 telephone number which reflected [redacted] known address and work
 telephone number.

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(S) On July 24, 2006, SA [redacted] received toll
 records from [redacted] in response to a
 National Security Letter prepared on May 19, 2006. The records
 received were divided between two subscribers; those of [redacted]
 [redacted] and those of a second subscriber. The records from [redacted]
 [redacted] reflected that [redacted] subscription to the telephone number
 in question, [redacted]

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Records for this subscriber, a presumed USPER were provided by [redacted]
 [redacted]. These records have
 been sequestered in the supervisor of squad [redacted] safe and the
 Legal Unit of the [redacted] has been contacted to
 seek guidance on the final disposition of these records. Pending
 instruction from the Legal Unit of the [redacted]
 these records will remain in the supervisor's safe and remain
 unopened.

~~SECRET~~

----- Working Copy -----

Page 1

DATE: 11-20-2007
CLASSIFIED BY: 65179dmh/rsr/msj
REASON: 1.4 (c)
DECLASSIFY ON: 11-20-2032

Precedence: ROUTINE

Date: 7/14/2006

To: [Redacted]

Attn: [Redacted]

Counterterrorism

Attn: ITOS 1/CONUS 3/Team 9

Inspection

Attn: Internal Investigative Section

Attn: [Redacted] Room 11865

From: General Counsel

National Security Law Branch/CIU 1/X-1 3S-100

Contact: [Redacted]

Approved By: Thomas Julie F

[Redacted Signature]

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Drafted By:

(U) Case ID #: ~~(S)~~ 278-HQ-C1229736-V10

Title: (U) Intelligence Oversight Board

(10B) Matter 2006- [Redacted]

(U) Synopsis: ~~(S)~~ It is the opinion of the Office of the General Counsel (OGC) that the above referenced matter need not be reported to the Intelligence Oversight Board (IOB). Our analysis follows.

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~~(U) (S) Derived from: G-3
Declassify on: 07/14/2031~~

(U) Reference: ~~(S)~~ 278-HQ-C1229736-V10 Serial 1459

(S) [Redacted]

Case ID : 278-HQ-C1229736-V10

Serial : 1567

[Redacted]

(S) [Redacted] 278-0

67

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Administrative: (U) This communication contains one or more footnotes. To read the footnotes, download and print the document in Corel WordPerfect.

Details: (S) By electronic communication (EC) dated June 22, 2006, the [redacted] reported a potential IOB matter to the Counterterrorism Division (CTD) and the OGC's National Security Law Branch (NSLB).¹¹ As set forth in that EC, on

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[redacted] term is defined in The Attorney General's Guidelines for FBI National Security Investigations and Foreign Intelligence Collection ("NSIC" or "the Guidelines"). Thereafter, on January 11, 2006, [redacted] to an Undercover Agent (UA). This number was previously unknown to the FBI as being associated with [redacted]

(S) Based on this information, [redacted] issued a National Security Letter (NSL) to [redacted] the communications provider of the above telephone number, on January 11, 2006. The NSL requested that [redacted] with all local and long distance toll billing records associated with [redacted]

(S) [redacted] received [redacted] response to the NSL on May 10, 2006. A review of the records provided by [redacted] revealed that [redacted] first subscribed to telephone number [redacted] [redacted] only received telephone records concerning [redacted] or the period of [redacted] [redacted] In addition, [redacted] received telephone records concerning another individual [redacted] [redacted] this individual, who is not connected to [redacted] subscribed to telephone number [redacted] [redacted] has taken no steps to further identify the other individual, nor has it utilized and/or uploaded the toll records concerning this individual.

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(U) ~~(S)~~ As required by Executive Order (E.O.) 12863 (Sept. 13, 1993) and Section 2-56 of the National Foreign Intelligence Program Manual (NFIPM), OGC was tasked to determine whether the surveillance errors described here are matters that should be reported to the IOB. We believe that the reported activity does not require IOB notification.

(U) Section 2.4 of E.O. 12863 mandates that the heads of Intelligence Community components report all information to the IOB that it deems necessary to carry out its responsibilities. That section requires Inspectors General and General Counsel of the Intelligence Community to report "intelligence activities that they have reason to believe may be unlawful or contrary to Executive order or Presidential directive." This language has been interpreted to mandate the reporting of any violation of guidelines or regulations approved by the Attorney General, in accordance with E.O. 12333, if such provision was designed in full or in part to protect the individual rights of a United States person. This includes violations of agency procedures issued under E.O. 12333, unless they involve purely administrative matters.¹³ For the FBI, the Office of the General Counsel (OGC) submits reports to the IOB.¹⁴

(U) ~~(S)~~ The NSIG provides that "all lawful investigative techniques may be used in full investigations." NSIG (Introduction) at 4. Section 2-56 of the NFIPM identifies as reportable to the IOB unauthorized investigations, the use of unlawful methods and techniques, exceeding the authorized scope of permitted activities, and failing to adhere to minimization requirements.¹⁵

(S) In this instance, [redacted] issued an NSL requesting records for cellular telephone number [redacted] after the UA advised that this was [redacted] telephone number. [redacted] requested these records for a one-year period in order to confirm that it was, in fact, [redacted] [redacted] did not know that another individual had subscribed to [redacted] during the requested one-year time period [redacted]

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2006) until it received [redacted] response to the NSL.

(S) Based upon these facts, it is apparent that [redacted] limited its cellular telephone records request to a reasonable one-year period. Although records belonging to another individual may not be relevant to [redacted] investigation, subscriber history for telephone number [redacted] is relevant. As part of its national security investigation, [redacted] must establish subscriber history for the subject telephone number and/or cellular telephone. In addition, as noted above, [redacted] had no way of knowing [redacted] did not actually subscribe to telephone number [redacted] during 2005 until it received [redacted] response to the NSL. Further [redacted] has neither utilized nor unloaded the records concerning the previous subscriber to [redacted]

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

FOOTNOTES

i1: See, referenced EC from the [redacted] to the OGC, dated June 22, 2006, Case ID# 278-HQ-C1229736-V10, Serial 1459, titled Possible Intelligence Oversight Board Matter.

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i2: The NSL defined the present as the date of [redacted] processing of the request or, if that were not feasible, the date of [redacted] receipt of the request.

(U) ~~(S)~~ See, EC from Inspection Division to All Divisions; Title: Revised Procedures for the Submission of Reports of Potential Intelligence Oversight Board (IOB) Matters, Case ID # 66F-HQ-A1247863 Serial 172 at 5-6 (2/10/2005). The Inspection Division is required to maintain for three years records of administrative violations, for possible review by the Counsel to the IOB, together with a copy of the opinion concerning the basis for the determination that IOB notification was not required. Id.

at 6.

(U) ~~(S)~~ 14: ~~(S)~~ 1d. at 4.

(U) ~~(S)~~ 15: ~~(S)~~ 1d. at 5, identifying reportable matters as including:
(1) activities believed to be unlawful or contrary to Executive Orders or Presidential directives; (2) suspected violations of the Constitution; (3) unauthorized investigations; (4) use of methods or techniques other than those authorized in the conduct of preliminary or full investigations; (5) initiating a form of electronic surveillance or a search without authorization from the FISC, or failing to terminate an authorized surveillance at the time prescribed by the Court; and (6) failing to adhere to the minimization or dissemination requirements specified in a FISC Order.

LEAD(s):

Set Lead 1: (Discretionary)

[Redacted]

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AT [Redacted]

(U) for review and action deemed appropriate.

Set Lead 2: (Info)

COUNTERTERRORISM

AT CONUS 3, TEAM 9, WASHINGTON, DC

(U) Read and clear.

Set Lead 3: (Action)

INSPECTION

AT WASHINGTON, DC

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Page 6

(U) As provided in the Revised Procedures for the Submission of Reports of Potential Intelligence Oversight Board (IOB) Matters, retain a record of the report of a potential IOB matter for three years for possible review by the Counsel to the IOB, together with a copy of the OGC opinion concerning the basis for the determination that IOB notification is not required.

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NSL VIO-35179

INTELLIGENCE OVERSIGHT BOARD (IOB) MATTER

[REDACTED]

IOB MATTER 2006 [REDACTED] (U)

(U)

~~(S)~~ By electronic communication dated April 18, 2006, the Federal Bureau of Investigation (FBI) [REDACTED] reported that on three separate occasions during the time period [REDACTED]

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[REDACTED] Office inappropriately utilized a National Security Letter (NSL). [REDACTED] drafted an NSL requesting transactional records [REDACTED] requested were [REDACTED]. However, because the information that is allowed to be obtained pursuant to an NSL is very specific, [REDACTED] is not specifically allowed pursuant to an NSL, [REDACTED] erroneously utilized the NSL. The information that was obtained beyond the scope of the NSL shall be sequestered. The inappropriate utilization of the NSL was in violation of V.12. of The Attorney General's Guidelines for FBI National Security Investigations and Foreign Intelligence Collection.11' Thus, the matter is being reported to the IOB.

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

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FOOTNOTES

11: (S) Section V.12. authorizes use of National Security

~~SECRET~~

~~SECRET~~ (S)

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Page 4

Letters in conformity with 18 U.S.C. 2709 (relating to subscriber information, toll billing records, and electronic communication transactional records). The statute requires that information sought is relevant to an authorized national security investigation.

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NSL VIO-35200

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---- Working Copy ----

Precedence: ROUTINE

Date: 09/12/2006

To: Inspection
General Counsel

Attn: IIS, Room 11861
Attn: NSLB, Room 7975

From: [redacted]

JTTF

Contact: TFO [redacted]

Approved By: [redacted]

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Drafted By: [redacted]

(U) Case ID #: ~~(S)~~ 278-HQ-C1229736-VIO

Title: (U) TFO [redacted]
SSA [redacted]
INTELLIGENCE OVERSIGHT BOARD (IOB) ERROR

(U) Synopsis: ~~(S)~~ To report possible IOB error.

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

Details:

(S) 1. [redacted]

(S) 2. [redacted]

(U) ~~(S)~~ 3. Possible IOB Error:

(S) [redacted]

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(U) ~~(S)~~ 4. Description of IOB Error.

(S) A National Security Letter (NSL) dated 06/29/2006 (serial E-MAIL 85) was submitted to [redacted] requesting the transactional logs and e-mail header information for [redacted] an e-mail address used by the subject. On 07/19/2006 the NSL was served by [redacted] [redacted] The results were received by [redacted] on 08/01/2006 and were forwarded to [redacted] with an EC dated 08/09/2006 (serial 481).

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(U) ~~(S)~~ [redacted] provided the NSL results on a CD-ROM. The case agent

Case ID : 278-HQ-C1229736-VIO

Serial : 1634

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NSL VIO-35208

(S)

reviewed this CD-ROM which contained subscriber transactional logs, and e-mail header information for [redacted]. It was discovered that subscriber information was also provided for an additional e-mail address which was not requested in the NSL. The e-mail address is very similar to the subject's e-mail address, but it does not appear that this other e-mail address is related to this investigation.

(U)

~~(S)~~ Since e-mail header and transactional log information can be purged by the service provider and/or user at any time the case agent did not want to chance losing any information contained on the CD-ROM. Information relating to captioned investigation was printed out and burned onto two other CD-ROMs. These other CD-ROMs are being stored in a 1-A envelope and do not contain any information relating to the non-pertinent e-mail address. No information pertaining to the non-pertinent e-mail address was entered into ACS. The original CD-ROM was turned over to CDC [redacted] on 09/12/2006 to be sequestered.

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LEAD(s):

Set Lead 1: (Action)

INSPECTION

AT WASHINGTON, DC

(U) For action deemed appropriate.

Set Lead 2: (Action)

GENERAL COUNSEL

AT WASHINGTON, DC

(U) For action deemed appropriate.

Precedence: ROUTINE

Date: 09/25/2006

To: General Counsel

Attn: National Security Law Branch
Counterterrorism Law Unit
Room 7975

Inspection Division

Internal Investigations
Section (IIS)

From:

[Redacted]

Contact:

[Redacted]

Approved By:

[Redacted]

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Drafted By:

b6

Case ID #: (U) 278-HQ-C1229736-VIO

b7C

(S) [Redacted] (Closed)

b7E

Title: (U) REPORT OF POTENTIAL INTELLIGENCE
OVERSIGHT BOARD (IOB) MATTER

Synopsis: (U) Report of a potential IOB matter to the National Security Law Branch (NSLB), Counterterrorism Law Unit (CLU), and the Inspection Division (ID) Internal Investigations Section (IIS), as required in the February 10, 2005, Inspection Division's EC to All Divisions entitled "Revised Procedures for the Submission of Reports of Potential Intelligence Oversight Board (IOB) Matters".

(U) ~~(S)~~

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

Details: (U) As directed in the Inspection Division's EC dated February 10, 2005, the following is being reported to the NSLB, CLU, and to the ID, IIS, as a potential IOB matter:

(U) 1. Identification of the substantive investigation in which the questionable activity occurred.

(S)

~~(S)~~ Interview of a [Redacted] subject and the issuance of a Right to Financial Privacy Act (RFPA) National Security Letter (NSL) [Redacted]

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Case ID : 278-HQ-C1229736-VIO

Serial : 1667

(S)

[Redacted] 66F-A2342

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NSL VIO-35242

(U) 2. Identification of the target.

(S) [Redacted]

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(U) 3. Identification of the subject's status.

(U) United States Person.

(U) 4. Controlling administrative requirement.

(u) ~~(S)~~ NFIPM, Section 19-02 - Investigative Strategy in International Terrorism Investigations

b) [Redacted]

(S) [Redacted]

[Redacted]

[Redacted] shall be in writing and include the reason [Redacted] If FBI Headquarters approves an [Redacted]

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[Redacted] the FBI shall notify the Office of Intelligence Policy and Review and provide to the Office of Intelligence Policy and Review [Redacted] statement (as described in the preceding sentence) within ten workdays of the transmittal of the approval to a field office.

(U) 5. Error believed committed.

(U) Synopsis of investigation:

(U) ~~(S)~~ This investigation was assigned to [Redacted] Task Force Officer (TFO) [Redacted] TFO [Redacted] supervisor is Supervisory Special Agent [Redacted]

(S) By [Redacted] EC to Counterterrorism, ITOS I, CONUS III.

[Redacted]

[Redacted] On July 25, 2005, surveillance was conducted on the subject's place of employment. [Redacted] On September 1, 2005, [Redacted]

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[Redacted] reported no information on the subject Pursuant to a September 19, 2006, request from the TFO, the [Redacted] by the [Redacted]

(U) ~~(S)~~ [Redacted]

[Redacted] By

~~SECRET~~

---- Working Copy ----

Precedence: ROUTINE

Date: 09/29/2006

To: General Counsel

Attn: AGC

CTLO 11/LX-1, 3S100

From:

[Redacted]

Contact:

[Redacted]

DATE: 11-29-2007
CLASSIFIED BY: 65179dmh/ker/maj
REASON: 1.4 (c)
DECLASSIFY ON: 11-29-2032

Approved By:

[Redacted]

Drafted By:

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Case ID #: (U) 278-HQ-C1229736-VIO (Pending)

[Redacted] (Pending) *closed*

(S)

Title: ~~(S)~~

SA [Redacted]
A/SSA [Redacted]

(U)

INTELLIGENCE OVERSIGHT BOARD MATTER
IOB 2006- [Redacted]

Synopsis: (S) Providing Office of General Counsel (OGC) with results of sequestered National Security Letter (NSL) documents relative to FBI [Redacted]

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

Reference: (U) 278-HQ-C1229736-VIO, Serials 1099 and 1654.

(U) Enclosure(s): ~~(S)~~ Original NSL documents.

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Details: (S) Per referenced EC, Serial 1654, OGC requested FBI [Redacted] to sequester the results of two NSLs, dated 11/15/2005 and 11/16/2005, which were served on two financial institutions relative to counterterrorism subject [Redacted]

(S) The 11/15/2005 NSL yielded positive results for [Redacted]. These financial records have been sequestered and are enclosed in the attached 1A envelope. The 11/16/2005 NSL yielded no results; therefore, no records are enclosed.

LEAD(s):

Set Lead 1: (Info)

GENERAL COUNSEL

AT WASHINGTON, DC

Case ID : 278-HQ-C1229736-VIO

Serial : 1718

b1

[Redacted]

~~SECRET~~

(S)

NSL VIO-35252

~~SECRET~~

----- Working Copy -----

Page 2

(U) ~~(S)~~ For action deemed appropriate.

~~SECRET~~

NSL VIO-35253

FEDERAL BUREAU OF INVESTIGATION
FOIPA
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