

From: Patrick Mc Carthy <notifications@un-casa-isacs.basecampHQ.com>
Subject: [Phase 2 - International Small Arms Control Standards (ISACS)] Re: 05.31 - Tracing illicit small arms and light weapons
Date: April 13, 2012 at 5:12:19 AM PDT

Reply ABOVE THIS LINE to add a comment to this message

Project: [Phase 2 - International Small Arms Control Standards \(ISACS\)](#)
Company: UN CASA



Patrick Mc Carthy commented on the message:

[05.31 - Tracing illicit small arms and light weapons](#)

Dear Colleagues,

I would like to thank the members of the ISACS Expert Reference Group who provided feedback on this module during its second and final review, which is now closed.

Substantive feedback is reproduced below, together with responses to individual points (introduced by "####").

Definitions of key terms used in the module are included in ISACS 01.20 (draft 3.0), which is available under the "Files" tab on the Phase 2 online workspace.

A revised version of the module (draft 3.1) can be accessed under the "Files" tab on the Phase 2 workspace or [by clicking on this link](#). The module will now be submitted to UN CASA Partners for a final internal review before being finalized and prepared for adoption by CASA.

I would like to thank the consultant on this module, **Mr. Ilhan Berkol**, for his excellent work in drafting the module and revising it following its first review and editing. I would also like to thank, in no particular order, the following members of the Expert Reference Group who provided feedback on the module during its first and second reviews:

FIRST REVIEW

1. David J. Penn – British Shooting Sports Council
2. Henny van der Graaf – EPES Mandala Consulting
3. Eric Berman – Small Arms Survey
4. James Bevan – Small Arms Survey
5. Mansour Ali Sultan – Iraq, Ministry of Interior

6. Ian Davis – Saferworld
7. Richard Patterson – Sporting Arms and Ammunition Manufacturers' Institute, Inc. (SAAMI), USA
8. Gary Mauser – National Firearms Association, Canada
9. Vito Genco – National Association of Sporting Firearms and Ammunition Manufacturers, Italy (ANPAM), Italy
10. Thierry Jacobs – FN Herstal S.A., Belgium
11. Glenn McDonald – Small Arms Survey
12. Sergio Suarez Roa – Colombia, Ministry of Foreign Affairs
13. Adrian Wilkinson – Explosive Capabilities, Ltd., UK
14. Paul Galveias – Canada, Department of Foreign Affairs and International Trade

SECOND REVIEW

1. Mansour Ali Sultan – Iraq, Ministry of Interior
2. Joe Green — New Zealand Police
3. Henny van der Graaf – EPES Mandala Consulting
4. Valerie Yankey Wayne — University of Calgary
5. Jean-Philippe Morange — UN Counter-Terrorism Committee Executive Directorate (CTED)
6. Richard Patterson – Sporting Arms and Ammunition Manufacturers' Institute, Inc. (SAAMI), USA
7. David J. Penn – British Shooting Sports Council
8. Glenn McDonald – Small Arms Survey
9. Thierry Jacobs – FN Herstal S.A., Belgium
10. Jesse James — Mines Advisory Group (MAG)
11. Gary Fleetwood — Australian Crime Commission

With best regards and sincere thanks to all reviewers,

Patrick Mc Carthy
ISACS Coordinator

Note: Clause numbers in the revised version of the module (draft 3.1) have changed due to some restructuring of the module's content. Revised clause numbers are indicated in the response to comments below.

Mansour Ali Sultan (Iraq, Ministry of Interior)

Is an independent point of contact or can get benefits from Interpol, the international system to help us?

As Iraq is a member of INTERPOL, you have access to its databases and other resources. For more details, see <http://www.interpol.int/Member-countries/Asia-South-Pacific/Iraq>

Joe Green (New Zealand Police)

Paragraph 2 of introduction: tracing firearms throughout their total life cycle. Is this the mandate for the POA? The use of the term 'should' mitigates this (rather than 'shall').

This language is based on paragraph 5 of the International Tracing Instrument, which defines the term "tracing."

Paragraph 3: It is highly unlikely that this actually solves crimes. The Australian research (Mouzos, homicide in Australia) determined that if a firearm were registered, and most were not, the firearm is likely to be registered to the victim. The question needs to be put directly to States that have a registration regime as to how effective it is in solving crime. The impression I have, speaking to at least one Australian State is that it is not a major contributor. Careful recording of firearms into and out of a State may be useful in determining characteristics of trafficking.

The situations I know of (Papua New Guinea, Solomons, Esat Timor and Fiji) the problem SALW came from State armouries.

Within states the major source of firearms in the hands of criminals is from theft. What becomes important is citizens having the confidence in police to report lost or stolen firearms, and then police maintaining a database of such firearms.

Overall agree with the tenor of section 4. 'Unique marking' will be an issue where manufacturers use the same numbering system for different production plants.

The wording here — now clause 5 — has been made more general to reflect the

definition of "illicit" SALW contained in the International Tracing Instrument.

Section 6.1: good list. Country of manufacture a must.

6.2.2 is problematic. I would consider that the number on the action (the bit that makes the gun go bang, so to speak) is most important. And arguably the only bit that really counts.

Clause 6 has been extensively revised in order to reflect this.

7.1 provides a good context - I support this list (and it provides context to my comment at the opening above.)

7.2 (a): this could not include a requirement to track transfers within the State.

This clause requires that a domestic tracing system be able to trace an illicit weapon back to its last legal owner within the country; or to the point where it left national jurisdiction by legal means.

8.2: such national record systems (registration regimes) are notoriously inaccurate and incomplete. It would be naive to expect that the agency 'will usually need only to consult that system'.

The relevant sentence, now in Clause 7.7.2, has been amended to read, "A point of contact in a State that maintains a centralized record-keeping system will usually begin the tracing process by consulting the centralized system."

The time that I have used a tracing system it has started with the manufacturer (identified by make, model and serial number), and went to the last legal transaction by a dealer. I found this module very technically detailed. It is also based on some premises that are not realistic, or are not reflected in reality. Basically data about firearms is not easily collected and maintained.

This last point is certainly true. The standards set by this module will not be easy to comply with. For many States to whom the UN might provide assistance on developing tracing capacity, applying this standard will take time and significant international cooperation and assistance. That said, the standards set by the module are achievable, given such assistance, and, if complied with, would increase the effectiveness of both domestic and international tracing operations.

Henny van der Graaf (EPS Mandala Consulting)

In general I agree with this module.

This module is rather technical and very detailed. In fact it asks for a tracing system embracing all weapons circulating in a country including those weapons stored for destruction. In a number of countries recovering from armed conflict often large amounts of weapons are stored in temporary locations without any registration.(see pictures below) Instead of bringing such weapons in any kind of registration system it would be more practical to destroy these weapons as quickly as possible without including them in time and personnel consuming administrative registration and tracing system. In principle, a tracing system should be future orientated and should avoid becoming an administrative burden. I support the comments made by Joe Green and Gary Fleetwood

Yes, the 'General provisions' clause — Clause 5 — was overly stringent here, requiring that all illicit SALW be traced. Relevant provisions of Clause 5 have been changed from 'shall' to 'should' and a new clause (5.4, Exceptions) has been added to reflect your concerns, as well as feedback provided by other reviewers.

Valerie Yankey-Wayne (University of Calgary)

This module is very technical and detailed.

5.3 Resource requirements

For some African Countries, the duties or mandate for the national point(s) of contact for tracing will likely be given to existing staff within the Police Criminal Investigations Unit or/and the National Intelligence Bureau.

The author has made a good point on a clear mandate and access to required equipments.

Emphasis could be placed on ensuring that the national point(s) of contact have access to technical training on international record keeping and tracing standards and processes, and authority and access to regional and international data (for example, relevant Interpol databases, etc)

Reference to INTERPOL's resources and regional databases have been added.

PS: Presently the ad hoc or informal units in some countries responsible for domestic and regional tracing operations do not have the authority to access to Interpol's Firearms Reference Table and Ballistics Information Network.

Question: Forgive my ignorance. But I want to know if there is any special computer software or database system besides the Interpol web resources that could assist in tracing operations – for example, technology that facilitates the tracing, etc

Jean-Philippe Morange (UN CTED)

Europol can assist its member states on specific request by Police services. Also, please see below this study on the EU projects and activities in that regard. Europol and the EU want to develop a lot of initiative in that area. For example "Develop national firearm databases. A concerted effort should be launched to enhance the traceability of firearms and to facilitate this all EU member states should develop a national database on the production, ownership, transfer and use of firearms and associated materials."

see link below http://www.unidir.org/pdf/EU_background_papers/EU_BGP_04.pdf

References to Europol (and to the Baltic Sea Task Force) have been added to examples cited under clause 9.3.

Richard Patterson (Sporting Arms and Ammunition Manufacturers' Institute)

This is a well-done module. I would agree with comments by Joe Green, Gary Fleetwood, Henny van der Graaf and others. In addition, I would add the following: 5.2 (a) to be consistent with wording in other parts of the document, you might want to add "relevant" domestic records...

Done.

5,2© suggest adding a reference about responding to requests 'as appropriate to domestic law(s)'

Paragraphs 18-23 of the International Tracing Instrument deal specifically with responses to international tracing requests. The module reflects these commitments accurately.

6.1© caliber is not essential information (for the purpose of a trace). Further, the caliber

is stamped on the barrel-a part that is easy to change. This should more accurately fall under 6.2.2

The International Criminal Police Organisation (INTERPOL) considers calibre to be one of five pieces of information that is essential to a trace request. The module reflects this.

6.2.1© barrel length is easily (and commonly) shortened by criminals, leading to incorrect information being provided for a trace

Reference to barrel length has been deleted.

6.2.1 (d) magazine capacity is irrelevant. Fixed magazines are easily altered with readily available aftermarket parts. Detachable magazines (if even present when the weapon is recovered) come in many different capacities for each weapon.

Reference to magazine capacity has been deleted.

7.5 should have a reference (or separate section) about the security and confidentiality of databases. You don't want sensitive information (potentially jeopardizing ongoing investigations) to become public knowledge, nor do you want bad guys able to access the database and damage or alter the database to cover-up their illegal activities.

The following text has been added to this clause (now 7.6): "Such databases shall be accessible only to law enforcement and other government officials authorized by a competent State authority."

10.4 does providing a "full history" potentially jeopardize the privacy of an innocent third party further up the legal distribution chain? At the least, there should be mention of a need to keep information 'confidential.'

Reference to "full history" has been removed. The clause now focuses on information on the last legal possessor.

10.5.2 delays and/or restrictions could also result from domestic laws of the requested PoC.

This clause (now 8.3.4.2) accurately reflects the provisions of the International Tracing Instrument related to delays and restrictions. Clause 8.3.4.2.a.2 refers to laws in the requested State for the protection of confidential information.

David J. Penn (British Shooting Sports Council)

I concur with the comments made by Henny van der Graff, Rick Patterson and Joe Green.

Joe Green is right in his caveat about the effectiveness of tracing in solving crimes. One would hope that this would improve as the years go by, but, to monitor this, I would suggest that the national reports detailing efforts to implement the International Tracing Instrument to be submitted every two years to the UN Secretary-General, via the UN Office for Disarmament Affairs (see 12.1) should contain a statement on the percentage of tracing requests which were 'successful' (there is a debate to be had as to what constitutes success. Is it merely the addition of one further piece of information to the file, or is success measured in terms of, for instance, the laying of a prosecution?)

Clause 10.2 has been amended to encompass more detail on the success of tracing operations.

Introduction paragraph 6: Some thought needs to be given to the desired outcome of a weapons collection programme. For instance an amnesty for illegally-held firearms might be more successful in terms of numbers of arms surrendered if it guaranteed anonymity to the person handing in the arm. This, however, would seriously hamper any tracing programme.

This paragraph of the introduction has been removed. ISACS 05.40 on collection deals extensively with amnesties and anonymity.

4 General provisions (or possibly 8.1 General procedures): For cost-benefit reasons, I would strongly recommend the inclusion of a paragraph suggesting that, unless there were reasons of overriding importance for doing so (for instance actual use in a serious crime, as opposed to a simple recovery from unlicensed possession), no attempt should be made to trace a single example of a SALW whose date of manufacture pre-dated 1946 and which did not bear recent import markings. Very frequently, the military did not bother to record serial numbers centrally (the British Army in the first half of the 20th century did not, or, if it did, the records have not come to light). Arms could change sides through capture, with minimal record keeping. I recall an instance where Russian Mosin-Nagant rifles turned up in Italian colonial hands in North Africa. The likely chain

of events was that they had been captured from the Russians by the Austrians, and then from the Austrians by the Italians, but proving it would be a fine thing, and what would be the value of 90-odd year old records? It would be a different matter if a quantity of such arms was located, for instance FN P35 pistols made during the German occupation of Belgium, which would still be potentially usable as military weapons or for criminal purposes. A batch could very likely indicate a recent transaction of some sort, so tracing would be more worthwhile.

These concerns, as well as feedback received from other reviewers, have been incorporated into new clause 5.4.

6.2.2: This reads 'The manufacturer if different from the make'. This is tautology, and it should read something along the line of 'The manufacturer if different from the type'. An example would be the common habit of referring to Mauser 98 type rifles as 'Mausers', even if actually made by FN, DWM, state arsenals such as Danzig or Amberg, CZ or whoever.

This clause — now 6.4.2 — has been modified to encompass the possibility of providing the identity of the manufacturer, irrespective of whether or not it is different from the make/type.

13 e): Others have cast doubt on 'calibre' as a useful identifier, and I agree. There are for instance numerous nominal '.30' calibre cartridges (e.g. .30/06, .30 M1 carbine. .30/30, Holland's Super .30, etc.) as there are for '7.92mm', '8mm' and many other calibres. 'Cartridge designation' would be potentially more useful, e.g. .30/06, but this is also fraught with pitfalls as one cartridge can have numerous synonyms and often Imperial and metric versions of its name, so would need some knowledge to use effectively.

This clause — now 6.5.e — has been modified accordingly

Glenn McDonald (Small Arms Survey)

GENERAL COMMENTS

1) There are some inconsistencies with the International Tracing Instrument (ITI), which need to be corrected. At a minimum, the module needs to be consistent with the ITI.

2) Of course, the module could and should add value to the ITI (i.e. build upon it), even while remaining consistent with the ITI. Let me highlight 3-4 possibilities.

a) Tracing in conflict and post-conflict contexts - Good to highlight this in the Intro., though the wording isn't entirely clear (see suggested edit below). You could also mention the new UN-INTERPOL coop. arrangements that should facilitate tracing by UN pk missions, embargoes experts, etc. An issue that is emerging on one/more radars, that deserves more attn.

b) It's important that the module does not put political obstacles in the way of tracing cooperation. Right now, it goes beyond the ITI in introducing such obstacles. Most important, when a state wants to trace a weapon it often won't have proof that the weapon is illicit or illegal under national or international law. The trace, if successful, will often confirm such illicitness /illegality, but at the time of initiating the trace there will only be a suspicion of illicitness.

The ITI obviously refers to the tracing of "illicit" SALW. There's an assumption, in many parts of the Instrument (e.g. para. 17a) that the illicit nature of the weapon is already known. This, however, doesn't make a lot of practical sense so I'd encourage the module author/s not to write in a requirement of known illicitness /illegality as a precondition for tracing coop. (see for example sec. 4 chapeau -- I'd change).

Clause 5.1 has been amended accordingly.

In a similar vein, para. 9.2.1.b adds to the elements that the ITI indicates should form part of a tracing request. Why? This can only hinder tracing.

This point has been deleted.

Once a state decides it wants to trace a weapon (suspicion of illicitness), there should be few obstacles to getting coop. from other states. In that regard, the module should limit itself to the reasons set out in ITI para. 22, not add to this list (responses to a tracing request) and to ITI, para. 17 (info. to be provided in a tracing request).

The relevant paragraphs of the ITI related to refusals, delays and restrictions in the context of responding to international tracing requests are paragraphs 15, 22 and 23. The provisions of these paragraphs are now reflected in Clause 8.3.4.2. The relevant paragraph of the ITI related to information to be provided in a tracing request is, as you say, paragraph 17, whose provisions are reflected in Clause 8.2.1.

c) Tracing of parts-components-ammunition). The ITI doesn't cover. It's good to introduce the issue. Since the module deals with tracing, not marking, a short general text is sufficient. But you could develop it a bit, in particular by making a clear distinction

between the kind of info. found on small arms cartridge casings and that on ammunition packaging. Think you're also missing 1-2 references to packaging in your "note".

3) There is a degree of over prescription in some parts of the module, sometimes ignoring constitutional differences between states that may preclude certain courses of action. At a minimum, the module needs to set out a series of general principles based on the ITI, with modest development of the latter. As several other experts have pointed out, many states have considerable difficulty covering the basics. The module should be careful not to overreach.

4) Perhaps the most troubling instance of over-specification in my view is the introduction of the distinction between national and international tracing ops. Yes, very often states will be tracing guns entirely within national jurisdiction. There will be no international cooperation (request for info. /reply to the same).

But in many cases, at some point, one state will need to seek info. from another. The trace becomes international at that point and it's not particularly important to specify in great detail what happens within a country when the latter is in the process of responding to the request from the other country.

I would urge you to rethink this. The national/international distinction currently complicates the module, and in some specific instances is simply wrong. See, for example, para. 8.1.b. How can a national point of contact, "using relevant domestic records" determine that the weapon was "diverted after having left national jurisdiction"? Clearly, the records that will be relevant are those held abroad.

This clause — now 7.7 — runs step-by-step through the procedure to be followed when a weapon is recovered under illicit circumstances. It emphasizes that the first priority is a domestic trace, in order to avoid unnecessary international traces (hence the necessary distinction between domestic and international tracing operations in the module). If the illicit weapon shows up in domestic records, there are two possibilities for where the weapon became illicit; inside or outside the jurisdiction of the State in which it was recovered. If domestic records indicate the last legal owner of the weapon, it follows that the weapon was diverted inside the State's jurisdiction. If, on the other hand, domestic records indicate that the weapon was exported, it follows that the weapon was diverted after having left its national jurisdiction. It is true that, in this case, the records of other countries will be required to determine the exact point of diversion, but domestic records are sufficient to determine that a diversion took place following export. The wording of the clause has been revised to make the recommended steps clearer.

LINE-BY-LINE COMMENTS

Introduction

para. 3 - Weapons tracing usually involves linking a weapon to a suspect, rather than the other way around. Note also that "interstate" and "international" are synonyms.

Done.

para. 4, line 2 - "in such cases" (typo.)

Done.

para. 5, line 2 - "For these reasons and others ..."

Done.

para. 6 - The reference to "military ops." isn't very clear. Replace with peacekeeping or other political missions mandated by the UN Security Council (e.g. arms embargo panels of experts)

This para has been deleted in response to a comment by David Penn and due to the fact that it did not add any useful information.

first bullet - I'd replace "correct" with "unique"

Done.

Module

sec. 4 - In at least 2 instances, this section obliges states to trace SALW ("shall be the subject of tracing ops", etc.). This is, must remain a matter of national discretion. This needs to be made clear thru. the module.

Shall has been changed to "should" in this clause also in response to feedback above from Henny van der Graaf.

sec. 4 - Follow ITI para. 6. There are some important differences.

Done.

5.1, para. 1 - There should be one pt of contact for tracing ops., in each country. The ITI talks about more than one (possibly) in order to cover some of the ITI info. exchange and reporting functions, which might be covered by a PoC different from that used for tracing ops.

ITI para 25 requires the designation of "one or more" national points of contact. Clause 7.1 reflects this as a requirement (shall). However, it has been amended to recommend that a single point of contact be designated for tracing operations.

5.3 - What's the distinction between the PoC and the National Authority? I wouldn't introduce one unless the reason to do so is compelling.

The National Authority on small arms and light weapons is "the lead government agency on small arms and light weapons control, which provides political coordination and policy direction for national small arms and light weapons control efforts" (Glossary). It is dealt with in ISACS 03.40, National coordinating mechanisms. The clause has been amended to make this reference clearer and to distinguish it from the point of contact on tracing.

6.1.e - "and, where available, most recent import". Even if you've an import mark, knowing the country of manufacture will often help with unique id.

Done.

6.2.2 - Not sure you need this para. If you've several different serial nos., you've an obstacle to unique id. I'd say 6.2.2 info. could be transmitted if the requestor has a doubt about which of several nos. is the serial no.

In response to other comments, separate clauses have been created for "other markings" (6.4.2); "multiple serial numbers" (6.4.4) and "unmarked frame/receiver" (6.4.3).

7.4 - I think it's sufficient here to restate the ITI principle of the "timely" retrieval (+ retrievability) of tracing info.

The wording of this clause has been modified accordingly.

8 - Here's a good example of overspecification. I'd stick to a few general principles that states apply depending on their structures and constitutions.

This clause — now clause 7.7 — provides guidance on basic steps to be taken to trace illicit weapons domestically before, if necessary, launching an international trace request. Clause 7.7.2 does take into account specific procedures in different States.

10.4 - I'm not sure about the usefulness of some of the info. being requested here. What's important is to reconstruct the transfer chain to the point of diversion. I'd stick close to that.

The purpose of this clause — now 8.3.3 — is to provide guidance on the type of information that would allow the transfer chain to be reconstructed and the point of diversion identified.

12.1 - Why mention an ITI reporting requirement in this ISACS module? In any case, it is a requirement, so not "should", but "shall" (if you retain it). See ITI para. 36 (contrast PoA, para. II.33)

Because it is a commitment that all UN Member States have made. Should has been changed to shall.

12.1 - Instead of the guidelines you mention, you should refer to the new template for integrated PoA-ITI reporting, also on PoA-ISS

Done.

12.2 - an important omission here -- exchange of info. on national marking practices (ITI para. 31b)

Included.

13 - In your note, you are lacking 1-2 references to ammunition "packaging".

This note — now in clause 6.5 — has been revised. It refers to ammunition "bearing a unique lot number" without specifying where, which is not necessary for the purpose of the note.

Thierry Jacobs (FN Herstal S.A.)

I agree with most of the comments made here above, I just want to add a few more:
- § 6: additional information such as other marks (proof marks for example) are very important because it is much more difficult to copy the official stamp of the proof house than a serial number or the name of the official manufacturer. Proof house mark will

reinforce the origin of the weapon

This is included in clause 6.4.2.

- § 10.5.1 : three weeks are not enough, I will recommend less than 3 months (By experience, in Belgium, it takes already 1 month Min before receiving the request for tracing at the manufacturer level. For quite old weapon it can take a lot of time to find back informations if they are not computerized)

The timeframe set out in this clause — now 8.3.4.1 — has been lengthened from 3 weeks to 8 weeks.

-§ 13. it is not because ammunition are produced under contract for military forces that they can be easily traced. Empty case are most of the time sold on the market of the metal and can be re sale to be reloaded. A case can be used a lot of time before being get out of order.

The note in this clause — now clause 6.5 — has been revised. Its purpose is to provide examples of when it can be difficult and feasible to trace illicit ammunition.

Jesse James (Mines Advisory Group)

Here is The feedback from MAG Field staff;

Para 6.1 IDENTIFICATION:

I have found that most national police cannot correctly identify weapons and this was reinforced during my training in Tanzania. So the ability to trace using national personnel falls down immediately because of lack of training on weapon recognition.

Hopefully this module, in particular clause 6 on identification of SALW , can help with this. Also, clauses 9.1.d, 9.2.2 and 9.2.3 address the issue of training on weapons identification.

The manufacturers serial number is unique but component parts will get changed so eventually you will have a weapon with various serial numbers:

SIMPLE EXAMPLE: Two weapons start with Manufacturer numbers ABCDE and Ser No 1234. The breech block ser no 1234 gets swapped to weapon frame ABCDE and vice versa so now 2 mirror weapons. Hence the importance of reporting all serial

numbers found on weapons destroyed as if MAG reported weapon ABCDE (Frame) destroyed and weapon ABCDE (Breech block) is collected by the DDR or used in a shooting etc it may leave things open to discussion!

I believe the US class the working parts (with serial number) as the actual weapon, all other serial numbers are subsidiary, should this be the norm?

The module puts priority on markings on the frame/receiver, which for the purposes of identification can be considered to be the weapon (see clause 6).

END

This comment was sent to Adrian Wilkinson, Adrienne Stork, Adèle Kirsten, Afi Azaratu Yakubu, Agnès Marcaillou, Alain Lapon, Alejandro Alvarez, Alex Butchart, Alexandru Dena, Alison August Treppel, Alistair Moir, Allegra Baiocchi, Amanda Cowl, Amna Berbic, Ananda Millard, Anda Djojonegoro, Andy Wheatley, Angus Urquhart, Anna Alvazzi del Frate, Anne-Marie Goetz, Anthony Connell, Anthony Simpson, Ayda Eke, Baffour Amoa, Barbara Munube, Ben Duncan, Benjamin King, Benjamin Lark, Benoît Le Chartier, Benoît Muracciole, Berna Capcioglu Pehlevan, Bernd Kaltenborn, Bernhard Mozer, Bush Dominique, Carl E. Case, Cate Buchanan, Cecilia Anicama, Charles Mumanthi, Christian Boatswain, Claudio Gramizzi, Colby Goodman, Coloner Germán Isaías Niño, Control ERG, Cyriaque Agnekethom, Cédric Poitevin, Daniel Andoh, Daniel Ladouceur, Daniël Prins, Dauren A. Aben, David Biggs, David Collins, David J. Penn, David Jensen, David O'Leary, Deepayan Basu Ray, Dejan Raketic, Diman Dimov, Dominique Taquet, Edward Laurance, Elizabeth Kirkham, Elkin Velasquez, Elli Kytömäki, Ema Tagicakibau, Eric Berman, Esteban Olhagaray, Eva Sacasa, Eveline Debruijn, Fabrice Bousalem, Fadi H. Achaïa, Faiz Paktian, Francesca Bocchino, Francis Sang, Fred Lubang, Frederic Peugeot, Gary Fenton, Gary Fleetwood, Gary Mauser, Geoffrey A. Francis, Gerard Chagniot, Giacomo Persi Paoli, Gilbert Barthe, Gillian Goh, Glenn McDonald, Gustavo Laurie, Guy Lamb, Guy Wilson, Hans Risser, Helena Vazquez, Henny van der Graaf, Herve Gonsolin, Hideki Matsuno, Hugues Laurence, Ian Ruddock, Ilhan Berkol, Jacqueline Seck, James Bevan, James Turton, Jean-Philippe Morange, Jeanine Baker, Jesse James, Joe Green, John Pokoo, Jon Trumble, Joost Kooijmans, Jorg Kuhnel, José Eduardo Proano, Judy Grayson, Julia Knittel, Julie Myers, Juma Assiago, Justin Brady, Justine Kumche, Katja Flueckiger, Kenneth Epps, Kenneth Smith-Christmas, Kerry Maze, Kerstin Vignard, Klaus Ljørring Pedersen, Koen De Groof, Kyle Parker, Larry Attree, Laurence Gerard, Laurentius Wedeniwski, Linus Malu, Lisa Nordoen, Luca Solimeo, Lydia Good, László Szatmári, Mansour Ali Sultan, Marcela Smutt, Maria Brandstetter, Maria Vardis, Marie-France Desjardins, Mark Bromley, Mark Westrom, Marren Akatsa-Bukachi, Martin Borgeaud, Martin Bühler, Mathew Geertsen, Maya Lindberg Brink, Michael Ashkenazi, Michael Dixon, Michelle Cervantes, Mieko Ikegame, Miguel Barreiro Laredo, Mikhail Seliankin, Mirjana Dokmanovic, Munyaradzi Chenje, Muriel Gschwend, Murray A. Smith, Mylva-Maria Varda, Mélanie Regimbal, Mónica Bolaños-Pérez, Nathalie Prévost, Nathalie Weizmann, Nicolas Gerard, Nicole Maric, Noel Mulliner, Norul Rashid, Oistein Moskvil Thorsen, Oleg Serezhin, Oscar Solera, Oumar Kande, Owen Greene, Pamela Maponga, Parviz Shomahmadov, Pasquale Capizzi, Patrick Mc Carthy, Paul Eavis, Paul Galveias, **Paul J. Shott**, Pericles Gasparini, Peter Weiderud, Petra Drexler, Petri Pieters, Philippe de Smedt, Rebeca Perez, Rebecca Peters, Rebekah Hunt, Richard Boulter, Richard Mugisha, Richard Patterson, Roberto Dondisch, Rosalie Azar, Rosy Cave, Roy Isbister, Sabrina Piffner, Sammy Kum Buo, Sara Sekkenes, Sarah Parker, Savannah de Tessières, Sergei Zamyatin, Sergiusz Sidorowicz, Shahodat Umarova, Sharif Baaser, Shashi Irani Kara, **Sho J. Morimoto**, Shukuko Koyama, Silvia Cattaneo, Silvia Mercogliano, Simon Bagshaw, Simon Rynn, Simon Tordjman, Simone Monasebian, Simonetta Grassi, Sonia Matilde Eljach Polo, Stefan Aniszewski, Stephen M. Singo, Steven Berti, **Steven Costner**, Stuart Casey-Maslen, Susan Manuel, Takashi Mashiko, Theresa Hitchens, Thierry Jacobs, Tonderai Chikuhwa, Tracy Hite, Valerie Lebaux, Valerie Yankey-Wayne, Vincent Choffat, Vitaliano Gallardo Valencia, Vito Genco, Wendy Cukier, William Godnick, **William Kullman**, Wolf-Christian Paes, Yadira Ledesma Hernández, Yamina Djacta, Yves Smith, and Zack Taylor.

Stop receiving emails when comments are posted to this message. [Prefer plain text emails?](#)

Delivered by [Basecamp](#)

[Note: The highlighted names above are officials of the US Government. All officials except for Mr. Kullman are US Department of State officials. Mr. Kullman is an official of the US Department of Justice's Bureau of Alcohol, Tobacco, and Firearms. – ISACS Accountability Project]