




EXECUTIVE ORDER 12333

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Summary of Comments on Slide 1

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NEXT TIME MIGHT WANT TO CONSIDER: SUMMARY SLIDE OF MAJOR CHANGES

COULD CONSIDER REVIEWING OTHER EOS

MORE EXAMPLES—EG UNDISCLOSED PARTICIPATION

EO 12333 REVISION: OVERVIEW



- **Background**
- **Role of DNI**
- **Role of other agencies**
 - **FBI, CIA, NSA**
- **Activities Inside the United States and Oversight**

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Check on clearances etc

Begin by asking to think about bodies of law that regulate intelligence activities.

Constitution— President has Commander in Chief power. Fourth Amendment has warrant clause and protection against unreasonable searches and seizures. But Fourth Amendment only applies to certain relatively intrusive activities by the Government. And Supreme Court has never decided extent to which amendment applies in national security area.

Statutes that regulate use of particular techniques or acquisition of certain info. FISA, law on torture, NSL statutes. May be pre-eminent in own area but limited to that area.

Criminal prosecutions. FISA has provisions for use of info in prosecutions. For other kinds of intell info, is CIPA or common-law state secrets privilege. But only a tiny fraction of intelligence investigations and activities result in criminal prosecution.

Finally, there's this, EO 12333. Give examples of range of activities—SIGINT, HUMINT, info from foreign services. So for many activities EO 12333 and the regulations that flow from it are the most important, particularly at a practical level. And that's true even though it's not a statute, not a judicial decision, just an EB document. Indeed, influence extends [give examples]

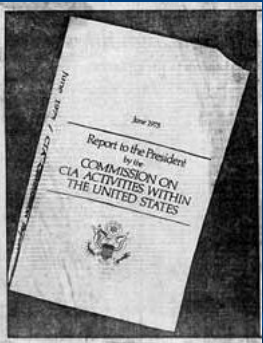


PART I: BACKGROUND . . . 1945-1976

- CIA was the dominant player in the Intelligence Community
- Authority to conduct intelligence activities and operations primarily from the National Security Act and from NSC directives, in response to developments in the Cold War
- Oversight was informal: NSC played some role, and the DCI briefed the president orally to obtain approvals for covert actions and other sensitive operations
- Congressional oversight colloquially described as BOGSAT—“bunch of guys sitting around a table”



CIA Infiltrated 17 Area Groups, Gave Out LSD



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Go back to post-WWII era when modern IC set up

Aware of Gestapo, KGB

Separate CIA from FBI

Law enforcement proviso in National Security Act—CIA has no police, subpoena powers or internal security functions

But

FBI under J Edgar Hoover

NSA operated under classified grant of authority

No Congressional intell committees

Abuses: experimentation; assassination; infiltration of domestic groups; mail openings

Results of abuses



PRIOR EXECUTIVE ORDERS: PRESIDENT FORD

EO 11905 (1976): UNITED STATES FOREIGN INTELLIGENCE ACTIVITIES

EO 11905 was promulgated in the wake of the CIA and FBI scandals of the 1960s and 1970s, as numerous Congressional committees criticized intelligence agencies. The executive order:

- Established policies to improve the quality of intelligence provided by the intelligence community
- Set out the responsibilities of Intelligence Community members
- Established comprehensive Executive Branch oversight mechanisms for the first time.



“Information about the capabilities, intentions and activities of other governments is essential to informed decision-making in the field of national defense and foreign relations. The measures employed to acquire such information should be responsive to the legitimate needs of our Government and must be conducted in a manner which preserves and respects our established concepts of privacy and our civil liberties. Recent events have clearly indicated the desirability of government-wide direction which will ensure a proper balancing of these interests.” (Section 5)

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Lay out what agencies can do

Prohibit or limit certain activities

Director of CIA also DCI



PRIOR EXECUTIVE ORDERS: PRESIDENT CARTER

EO 12036 (1978): UNITED STATES INTELLIGENCE ACTIVITIES

- Established a panoply of intelligence coordinating and oversight committees within the executive branch
- Described respective responsibilities of IC members in further detail
- Elaborated upon limitations on the IC
- Set out very specific commitments for the President and IC members to ensure compliance with Congressional oversight, going beyond existing statutory requirements



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EO 12333 (1981) UNDER REAGAN



WHAT IT DID:

- Described, in further detail, the respective powers and responsibilities of various intelligence community members
- Clarified coordination functions relating to the intelligence community as a whole
- Clarified what kind of information could be gathered by IC members, and more clearly described what kinds of techniques could and could not be used to collect this information.
- Mandated that IC members would comply with various statutory requirements pertaining to intelligence oversight, but provided the IC with more flexibility by eliminating the more detailed commitments in EO 12036.

“Timely and accurate information about the activities, capabilities, plans, and intentions of foreign powers, organizations, and persons, and their agents, is essential to the national security of the United States. All reasonable and lawful means must be used to ensure that the United States will receive the best intelligence available.”

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INTELLIGENCE REFORM AND TERRORISM PREVENTION ACT



“The current position of Director of Central Intelligence should be replaced by a National Intelligence Director with two main areas of responsibility: (1) to oversee national intelligence centers on specific subjects of interest across the U.S. government and (2) to manage the national intelligence program and oversee the agencies that contribute to it.”

9/11 Commission Report at 411

- **Implemented recommendations of the 9/11 Commission**
- **Belief that Director of Central Intelligence did not have sufficient authority over disparate elements of Intelligence Community**
- **Belief that too much information “stovepiped” by agencies**



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Recommends DNI

IRPTA 2004



RECENT REVISIONS TO EO 12333, JULY 2008



From the Background Briefing by Senior Administration Officials, July 31:

“ [T]his is the first significant adjustment in the executive order in several decades. With the passage by the Congress and signature by the President in the fall of 2004, the Intelligence Reform and Terrorist Prevention Act -- significant provisions in this executive order became out of date. And so... it was absolutely necessary to revise and update -- modernize this order.

...[I]t is a foundational document. It has a daily and significant impact on the activities of the intelligence community and the relationships in that important community. At the highest level, of course, the aim here is to create a more effective intelligence community, where these 16 agencies can be better integrated, work more collaboratively with one another, and also share more information freely.”



“ The revised Executive Order implements the reforms enacted into law by the Intelligence Reform and Terrorism Prevention Act of 2004 and creates a more unified, integrated, and collaborative Intelligence Community under the leadership of the Director of National Intelligence.”

Statement by the White House Press Secretary, July 31

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One of the stumbling blocks in passing IRPTA and its implementation was relationship between DNI and military intelligence

SecDef—Robert Gates--former Director of CIA

Under SecDef—General Clapper—former head of DIA

General Hayden—Director of CIA. Former Director of NSA and military officer


DCI—Mike McConnell—former Director of NSA and military officer



EO 12333 REVISION: WHY NOW?

- **Align with 2004 Intelligence Reform legislation and implement additional recommendations of the 9/11 and WMD Commissions**
- **Clarify and strengthen the role of the DNI**
- **Use experience implementing reform**
 - **Unique IC experience of current agency and department heads**
- **Establish durable framework for intelligence activities**
- **Maintain or strengthen privacy and civil liberties protections**

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Why now?

Eo 12333 not up to date

Clarify role of DNI

In addition to experience of officials, also 3 years experience with new structure



EO 12333 IN THE NEWS

The Washington Post

Controversy with Congress

"Although the revamped order had been in the works for a year, its formal unveiling prompted a rare revolt from congressional Republicans, some of whom walked out on Director of National Intelligence Mike McConnell during a morning briefing. Rep. Pete Hoekstra (Mich.), ranking Republican on the House intelligence committee, led several GOP colleagues to the exit after complaining that the administration had made the changes secretly without consulting with congressional overseers..."

Joby Warrick, "Bush Unveils Spy Guidelines, Angering House Overseers," Aug. 1, 2008



The New York Times

"President Bush has approved a long-awaited revision of the executive order that governs the nation's 16 spy agencies, the latest effort to wrestle the competing bureaucracies into a single effort under the director of national intelligence."

Scott Shane, "Bush Issues Order Seeking to Unite the Efforts of U.S. Spy Agencies," Aug. 1, 2008

Los Angeles Times

Two senior administration officials called the revisions "the most significant of its kind in more than a generation," representing the first revamp of EO 12333 since President Reagan issued it in 1981.

"Revamp of U.S. spy agencies centralizes power," Aug. 1, 2008

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When new EO announced some in Congress unhappy:

- inadequate consultation
- foundational document

Several walked out

Relatively little attention since—EO is evolutionary



PART II: THE ROLE OF THE DNI



- **Head of the IC**
- **Is the principal adviser to the President, NSC, and Homeland Security Council on intelligence matters**
- **Oversees the National Intelligence Program**

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NIP is all activities of the IC. Does not include tactical military intelligence collection.

In charge of developing guidelines for intelligence sharing among members of the IC

Expanded role in budget, program, classification, and procurement decisions, setting standards across the IC

Formulates IC policy for engagement with foreign intelligence and security services



THE ROLE OF THE DNI . . .



IRTPA Section 1018

- Community implements DNI directives
- Procedures for Department heads to raise concerns if they see abrogation

Coordination of IC Intelligence Activities

- DNI issues overarching policies and procedures to ensure coordination of intelligence activities
 - Establish coordination thresholds; define types of activities to be coordinated; etc.

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IRPTA says President to issue guidelines to ensure effective use of authorities given to DNI "in a manner that respects and does not abrogate the statutory responsibilities of heads of Departments."

New 12333 are President's guidelines: Section 1.3(c) restates requirement of IRPTA. It then says IC shall implement DNI's directives, provided that Department head who believes IRPTA 1018 violated shall bring issue to attention of DNI, NSC, or President for resolution

Now turn to three specific areas:

- DNI's access to info
- designations within IC
- personnel



ACCESS TO INFORMATION

“National Intelligence and Intelligence Related to National Security means all intelligence, regardless of the source from which derived and including information gathered within or outside the United States, that pertains . . . to more than one . . . agency; and that involves threats to the United States, its people, property, or interests; the development, proliferation, or use of weapons of mass destruction; or any other matter bearing on United States national or homeland security.”

Section 3.5(i); IRPTA Section 1012

- **All agencies have responsibility to produce intelligence in a manner that allows the full and free exchange of information**
- **Definition of “national intelligence” in IRTPA**
- **DNI to determine if information “pertains to more than one agency” in accordance w/ definition**
- **DNI will develop AG-approved guidelines for access to information held in other US Government agencies**

Sections 1.1(g); 1.3(e)

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Definition of national intelligence.

DNI shall establish common access standards for intelligence information, with special emphasis on facilitating the fullest access to and dissemination of intelligence on international terrorism. Section 1.3(b)(6)

DNI to have access to all that national intelligence and information related to national security, except for information excluded by law, by the President, or by the AG acting under EO 12333 at direction of the President. Section 1.5(a).

For information covered by section 1.5(a), DNI shall promulgate guidelines. Guidelines approved by the AG. Section 1.3(a)(2).

Other agencies—broader than IC.



FUNCTIONAL AND MISSION MANAGERS

- **Functional managers**
 - **Director of NSA—signals intelligence**
 - **Director of CIA—human intelligence**
 - **Director of the National Geospatial-Intelligence Agency—geospatial intelligence**
- **Mission managers—principal advisors on regions, topics**
- **DNI may designate**

Section 1.3(b)(12)

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Functional managers—guidance and policies; tradecraft and training standards; coordination; and advice to DNI for a particular intelligence discipline or set of activities

Appears to give Director of CIA role in FBI's human intelligence activities.

DNI may establish one or more national intelligence centers to address intell priorities. Section 1.3(b)(11)



EO 12333 REVISION: HIRING AND FIRING

- DNI must concur in selection of:

- Executive Assistant Director for National Security Branch of FBI
- Director of NSA
- Other intelligence officials

- DNI must be consulted in selection of:

- DoD intelligence positions, including military positions
- Assistant Attorney General for National Security

Section 1.3(e)

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DNI has major role in hiring and removal of intelligence officials. Smaller role with respect to DoJ and DoD officials.

Reflects changes brought about by IRPTA.

Major change from prior EO 12333.



PART III: ROLES OF THE AGENCIES . . . FBI



- Collect, analyze, produce, and disseminate foreign intelligence and counterintelligence, Section 1.7(g)(1)
- Conduct counterintelligence activities (inside and outside the U.S.), Section 1.7(g)(2) Conduct foreign intelligence liaison relationships with intelligence, security, and law enforcement services of foreign governments or international organizations, Section 1.7(g)(3)
- Provide technical assistance, whether within or outside the U.S., to foreign intelligence and law enforcement services, Section 1.13



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16 agencies in IC. Include parts of DOE, Treasury, DHS, DEA, Coast Guard, military services. Not going to cover all. Touch briefly on three.

FBI role in CT and CI matters well known. Increasing role in other FI.

FBI has pre-eminent role in US—will see.



CIA AUTHORITY AND RESPONSIBILITIES



- Collect, analyze, produce, and disseminate foreign intelligence and counterintelligence
- Conduct counterintelligence activities outside the U.S.
- Conduct covert action activities approved by the President
- Conduct foreign intelligence liaison relationships with intelligence or security services of foreign governments or international organizations

Section 1.7(a)



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OUTSIDE THE UNITED STATES: COORDINATION

Outside the US—

- **Director of the CIA coordinates clandestine collection of foreign intelligence through “human sources or through human-enabled means”**
- **CIA also coordinates counterintelligence activities**
- **All agencies inform the Secretary of Defense of clandestine collection of foreign intelligence in combat area**

Sections 1.3(b)(20) and 1.5(j)



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Number: 1 Author: Presenter Subject: Presentation Notes Date: 3/11/2015 11:18:25 AM
Outside the US Director of the CIA coordinates:

Clandestine collection of foreign intelligence through "human sources or through human-enabled means"
Counterintelligence activities
Relationships with foreign services

All agencies inform the Secretary of Defense of clandestine collection of foreign intelligence in combat area



NSA AUTHORITY AND RESPONSIBILITIES



COORDINATION TASKS AND EXCLUSIVE FUNCTIONS

- NSA has sole authority to engage in signals intelligence activities unless the Secretary of Defense specifies otherwise
- Collect, process, analyze, produce, and disseminate SIGINT for foreign intelligence and counterintelligence purposes, and control SIGINT collection and processing activities
- Create and operate a unified organization for all SIGINT activities
- Conduct foreign cryptologic liaison relationships



Section 1.7

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Also national manager for national security systems



EO 12333 REVISION: OTHER SECTORS

ORIGINAL EO 12333 (1981)

- Little consideration of the national intelligence effort at a non-federal level
- IC allowed to provide specialized equipment, technical knowledge, or assistance of expert personnel to local law enforcement agencies where lives endangered



REVISED EO 12333 (2008)

- State, local, and tribal governments are “critical partners”
- IC should take their requirements and responsibilities into account
- IC also may consider requirements and responsibilities of private sector entities

Sections 1.1(f);1.4(g); 2.6

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Number: 1 Author: Presenter Subject: Presentation Notes Date: 3/11/2015 11:18:27 AM
1981: little reference to state and local governments, none to private sector

New: State and local are partners. IC should take into account the requirements of these entities, and private sector entities.



EO 12333 REVISION: AGENCIES OUTSIDE THE IC

- **All agencies must provide the DNI with access to all information and intelligence relevant to national security**
- **DNI may provide advisory tasking to agencies outside the Intelligence Community**
 - **Agencies must respond “to the greatest extent possible”**
 - **AG approves implementing procedures**

Sections 1.3(b)(18); 1.5(e)

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Reach into non-IC agencies for information.

Tasking of non-IC entities. Parts of agencies not in IC. Other non-IC entities.

Combine with personnel, budget, program authorities inside IC



PART IV: ACTIVITIES INSIDE THE UNITED STATES AND OVERSIGHT

Inside the US—

- **Director of FBI coordinates clandestine collection of foreign intelligence through “human sources or through human-enabled means”**
- **FBI also coordinates counterintelligence activities**
- **All agencies inform the AG and DNI of intelligence activities not coordinated with the FBI**
- **AG approves all procedures for coordination**

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We've talked about CIA's coordination of human intelligence and CI activities outside the US, and relationships with foreign services, and the SecDef's role in combat areas.

Inside the US, 2 FBI roles. Also info to AG (may be through FBI), and procedures.

Compare bullets



INSIDE THE UNITED STATES . . .

- **FBI collects foreign intelligence not otherwise obtainable**
- **Other agencies may collect if:**
 - **Significant foreign intelligence is sought**
 - **Not for purpose of acquiring information about the domestic activities of US persons**
- **FBI normally conducts physical searches and physical surveillances of US persons**
- **CIA may not conduct electronic surveillance**

Sections 2.3(b); 2.4

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Coordination by FBI if in US




INSIDE THE US: UNDISCLOSED PARTICIPATION

- **No one acting on behalf of IC may participate in organization in the United States unless:**
 - **Intelligence affiliation disclosed, or**
 - **Use procedures approved by AG**
- **Participation must be essential to achieving lawful purposes**
- **If purpose is influencing the organization or its members:**
 - **FBI may participate in course of lawful investigation, or**
 - **Other agency may participate if organization is composed primarily of non-US persons and acting on behalf of foreign power**

Section 2.9

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Talk from slide.

Participation must be essential to lawful purpose as determined by agency head or designee.

Need to be aware of. May run into in investigations see.

OVERSIGHT PROVISIONS: SECTION 2.3



This section governs the type of information that can be collected by the IC and the procedures for doing so.

For U.S. persons IC may collect, retain, and disseminate information that is:

- Publicly available information, or information obtained with the consent of the person concerned
- Foreign intelligence or counterintelligence information
- Information obtained during a lawful foreign intelligence, counterintelligence, international drug, or international terrorism investigation
- Information needed to protect the safety of any persons or organizations
- Information needed to protect foreign intelligence or counterintelligence sources, methods, and activities from unauthorized disclosure
- Information concerning persons reasonably believed to be potential sources or contacts
- Information arising from lawful security investigations
- Information acquired from overhead reconnaissance not directed at particular U.S. persons
- Incidentally obtained information suggesting involvement in illegal activities
- Information necessary for administrative purposes

However, collection, retention, and dissemination of such information is **only** permitted in accordance with procedures developed by the responsible IC member and approved by the Attorney General.

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This is provision of EO that requires all the IC agencies to have AG-approved guidelines.



SECTION 2.3 . . .

- **Allows collection of information needed to protect safety, including targets, victims, or hostages of international terrorist organizations**
- **Changes:**
 - **DNI now has role in procedures**
 - **Information obtained from SIGINT may be disseminated to other agencies, subject to procedures**

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Two changes:

Concept of uniformity in procedures

Significance of SIGINT change

Use of 2.3



OVERSIGHT PROVISIONS: SECTION 2.5

“The Attorney General hereby is delegated the power to approve the use for intelligence purposes, within the United States or against a United States person abroad, of any technique for which a warrant would be required if undertaken for law enforcement purposes, provided that such techniques shall not be undertaken unless the Attorney General has determined that there is probable cause to believe that the technique is directed against a foreign power or an agent of a foreign power...”

Allows the Attorney General to authorize the use of a surveillance or search technique if:

- The technique is being used for intelligence purposes;
- It is being used within the U.S. or against a U.S. person abroad;
- The technique is one that would require a warrant if it were being used for law enforcement purposes; and
- The AG has found that there is probable cause to believe the technique is directed against a foreign power or an agent of a foreign power
- These requirements are *in addition to* the requirements of FISA and the FISA Amendments Act

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Always needs to be considered.




EO 12333 REVISION: REPORTING AND OVERSIGHT

IC agency heads must:

- Give officials responsible for privacy or civil liberties protection access to “any information or intelligence necessary to perform their official duties”
- Report violations of criminal law to the AG
- Report any intelligence activities that may have been unlawful to the Intelligence Oversight Board and DNI

Sections 1.3(e); 1.6(b)(c) and (h)

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Oversight Unit should be aware of first bullet



PRIOR LIMITATIONS ON THE IC REMAIN IN PLACE

- Generally, only CIA can conduct covert action (Section 1.7(a)(4)), and EO 12333 prohibits covert actions designed to have a domestic effect (Section 2.13)
- The prohibition on human experimentation remains (Section 2.10)
- The prohibition on assassination remains (Section 2.11)
- Members of the IC cannot use intermediaries to circumvent the prohibitions in EO 12333 (Section 2.12)

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Physical search, physical surveillance, and undisclosed participation in organizations in the United States. Limited in most circumstances to the FBI.

Covert action

Term "covert action" now used explicitly

NSC assembles recommendations and dissents for presentation to President

NSC does not undertake covert actions

CIA normally conducts

Indirect participation

No element of the IC shall participate in or request any person to undertake activities forbidden by EO.



EO 12333 REVISION: GUIDELINES

- **Information sharing**
- **Criminal drug intelligence activities outside the United States**
- **Advisory tasking of agencies outside the Intelligence Community**
- **AG must approve all policies and procedures for coordination of counterintelligence activities and clandestine collection of foreign intelligence inside the United States**

Sections 1.3(a)(2); 1.3(b)(5);1.3(b)(20)(C); 1.6(g)

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One of protections are numerous guidelines.

Handout lists protections.



FUTURE DEVELOPMENTS?

- Issuance of multiple guidelines
- Use of DNI authority to task non-IC members, pursuant to Section 1.3(b)(18)
- Intelligence Community still not well coordinated or too centralized?

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Read 12333. Is charter document for IC. Read skipping section 1.3 and come back to that last.