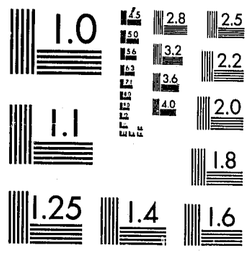

SECURITY & PRIVACY ISSUE BRIEF
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THE INTERSTATE EXCHANGE OF CRIMINAL HISTORY RECORDS

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SEARCH Issue Briefs

SEARCH, the National Consortium for Justice Information and Statistics, provides support to state and local agencies in all aspects of information system planning, design, implementation and management. SEARCH has particularly strong experience in the area of security and privacy of criminal justice information. This program is designed to support the successful implementation of security and privacy principles by clarifying national security and privacy issues and requirements. This is being accomplished through a grant from the Bureau of Justice Statistics, U.S. Department of Justice, which provides resources to guide and assist states in how to respond to federal and state privacy requirements.

In order to maximize the use of information contained in its data base, SEARCH plans to prepare quarterly issue briefs which will review and discuss topics of current interest to privacy specialists. The following is the third of these issue briefs.

SEARCH recently convened a small group of criminal justice practitioners and experts in the area of the interstate exchange of criminal history record information to discuss the issues involved in interstate exchange. Among the issues addressed were law and policy regarding the interstate exchange of criminal history records and the practical effect of various alternative methods of exchange. This document examines those issues, based on the workshop discussions and the views and concerns expressed by the participants. The document reflects the nature of the discussions and the issues and considerations raised; it does not necessarily represent the views of particular participants or the consensus of the workshop.

Your suggestions for future topics are encouraged. Set your own agenda--tell us which security and privacy issues should be addressed in future issue briefs.

INTRODUCTION

The debate continues. After more than 10 years, criminal justice practitioners, administrators, public officials and concerned citizens continue to struggle with methods and standards for exchanging criminal history records among the states. The issues are partly economic, partly technical, partly legislative and partly political. Considering the complex interactions among these factors, the difficulty in developing consensus becomes apparent.

Notwithstanding the problems, the nationwide exchange of criminal history information is both necessary and useful. Two important reasons support this assertion. First, rates for both criminal recidivism and criminal mobility are substantial. Although there have been no precise measurements of recidivism and mobility rates, it has been estimated that between 50 and perhaps 70 percent of all persons arrested have been previously arrested, and that a significant percentage have arrest or conviction records in more than one jurisdiction.[1] High recidivism and mobility rates make it worthwhile for justice agencies to exchange information on an inter-jurisdictional basis.

Second, numerous studies have shown that justice agencies, including the courts, do in fact routinely obtain and use criminal history records in the performance of their duties. Police and investigators use criminal histories in developing leads and in reaction to on-the-scene situations. Prosecutors use criminal histories in making charging and release decisions. Parole boards typically take criminal history record information into account, and correctional officials use criminal history data in making decisions about offender participation in various institutional or release programs.

For all their utility, however, the maintenance and use of criminal history records, even when confined to criminal justice agencies, may have adverse effects upon persons with criminal records. For instance, the exchange of these records may lead to increased and unwarranted police surveillance or harrassment. Moreover, if the records contain erroneous or incomplete information, their exchange is likely to increase the potential for harm to the record subject. When criminal history records are disseminated beyond the criminal justice community, harm may increase significantly, impairing the subject's opportunities for employment, housing, credit, licensing and other valued resources and statuses.

In sum, much is at stake in setting policy for the exchange of criminal history record information among the states and between the states and the federal government. And, in the long run, determining who shall set such policies is perhaps as important as determining the nature of those policies.

FORCES AFFECTING THE DESIGN OF A NATIONWIDE EXCHANGE PROGRAM

Experience with the FBI's Computerized Criminal History component of the National Crime Information Center (NCIC/CCH) has demonstrated that a major obstacle to the success of a centralized national criminal history file is the high cost to the participating states of maintaining and updating records in the national repository as well as in their own local files. A survey conducted in 1979 for

the Office of Technology Assessment found that the cost of duplicating state files at the federal level and the operational problems of updating these files were major reasons why states declined to participate in the CCH program or dropped out after initially participating.[2]

Taxpayer revolts, typified by California's Proposition 13, as well as rising inflation and the dwindling sources of federal grant assistance, have caused cutbacks in state criminal justice programs in the last few years. State legislatures have accordingly become increasingly concerned about the financial aspects of a federal repository. Not only are they critical of the unjustified cost of record duplication, but they are reluctant to approve state funds for support of a federally-managed criminal justice information system. Given the bleak economic outlook for the years ahead and the likelihood of little federal support for local systems, economic factors alone may well dictate that any future system for the interstate exchange of criminal history records will be a decentralized one under the policy control of the participating states.

Technology

In the last decade justice agencies have made dramatic advances in the use of automation and modern communications technology in their criminal history information systems. At the beginning of the decade probably not one criminal justice agency had a fully automated criminal history record system. Ten years later, most state and local agencies have utilized modern information handling techniques to some extent, and many agencies have substantially automated their criminal history record information systems.

This rapid growth in the automation of criminal history systems has been made possible by advances in computing power as measured by price/performance ratios. The Privacy Protection Study Commission, a two-year independent Federal study group, published a 1977 report that highlighted the increases in computer performance.[3] For example, the Privacy Commission estimates that the speed with which computers can handle instructions and thus manipulate information has increased 50 thousand-fold in the last 25 years. During the same period the information storage capacity of computers has increase 10 thousand-fold.

Programming capabilities also have become more sophisticated. Modern computerized criminal history systems now maintain millions of records with narrative text and automatically keep a record of disseminations, distribute correction and updating information, withhold sealed data, and purge records. Information can be retrieved from such systems keyed to name, fingerprint classification or other identifiers in only a few seconds.

Computing costs have been reduced 100 thousand-fold over the last 25 years. In the decade of the 70's, the development of mini and microcomputer technology has brought automation to the point that almost every state-level agency and many local agencies have been able to use computers in some aspects of their criminal record systems. The likelihood is that in the next few years even the smallest agencies will be using computer technology for operational and management functions.[4]

Advances in computing power have been matched by advances in communications technology. Modern criminal justice information systems link agencies throughout a state or in other states via remote terminals that permit users to input and retrieve data on an on-line, nearly instantaneous basis. The addition of hard copy printers and facsimile transmitters permit computer-generated rap sheets to be in the hands of police, prosecutors or the courts within minutes of a request, even if the user is hundreds of miles from the repository. The Privacy Commission Report notes that in the last 50 years data transmission capacity has increased three orders of magnitude, from 3,000 characters per second over 12 voice channels in 1920, to eight million characters per second over 100,000 voice channels via helical wave guide and optical fiber systems in the late 70's.

As a result, many states have been able to upgrade their systems so as to satisfy most intrastate needs from internal state files. Thus, dependence on federally-supplied services has been drastically reduced, and the high cost of duplicating state files for national use has become even less supportable.

Privacy and Federal Data Banks

The explosion of computer technology and moves to develop large automated data bases, particularly at the federal level, have generated widespread concern about safeguarding individual privacy rights and limiting national data banks. This concern was expressed in a widely publicized series of congressional hearings on federal data banks and the dangers of "Big Brotherism" inherent in the accumulation of sensitive personal information in federal information systems. These hearings and the public response aroused by them initially emerged as a general fear of computers and a threat to privacy. By the mid-70's, however, the focus had shifted to more pragmatic interests which could be dealt with by legislation or management policy. For justice information, this focus took two main forms: (1) attempts to enact federal legislation setting standards for the maintenance and dissemination of criminal justice information, and (2) increased interest in the policy for managing national systems.

Although attempts to enact federal legislation were not successful, they did increase interest in privacy issues among legislative leaders, private interest groups and federal agencies including the Office of Management and Budget and the White House Office of Telecommunications Policy. The views of these groups concerned privacy and information policy generally, and the role of the federal government in interstate information exchange specifically. During the latter half of the 70's, these groups became increasingly suspicious of federal policy control over state information exchange.

As the decade ended, it seemed clear that in order to satisfy the privacy and policy concerns of cognizant congressional committees and federal agencies, any interstate criminal history exchange system would have to be decentralized and the management policy for operating such a system would have to be sensitive to the legal, political and social concerns of the states.

State Legislation and Regulations

Although it passed no comprehensive legislation, Congress did enact one law that affected how state and local agencies would handle criminal history data. A 1973 amendment to the *Omnibus Crime Control and Safe Streets Act of 1968* added Section 524(b) which required the Law Enforcement Assistance Administration (LEAA) to adopt regulations to assure the security and privacy of data stored in state and local criminal history record systems.

Those Regulations[5] set standards for dissemination, data quality, security, audit and subject access to criminal history records. Systems supported by funds from LEAA had to comply. While they do not place significant limitations upon the exchange of criminal history information within the criminal justice community, the Regulations prohibit the disclosure of non-conviction information to non-criminal justice agencies unless a state or local statute, executive order, or court decision authorizes such disclosure.

Compliance by the states has contributed greatly to the awareness of privacy issues among professionals. As a consequence, the states have been active in enacting criminal justice information legislation and promulgating implementing regulations. Today every state has legislation

that, to one degree or another, covers the handling of criminal justice information. For example, 43 states give subjects a statutory right of access to their criminal history records for the purpose of review and correction. Eighty-five percent of the states have statutory standards for accuracy and completeness. Eighty percent of the states impose statutory limitations on the dissemination of criminal histories, particularly to non-criminal justice recipients. Seventy-five percent of the states impose criminal penalties for improper dissemination.[6]

In order to better control dissemination of sensitive information, many states have enacted statutes that create central repositories which serve the information needs of justice agencies throughout the state. Many of these repositories are fully operational and have assumed an increasingly more important role in the formulation of statewide information policies and practice.

Resolution of the issues central to the interstate exchange of criminal history records now must account for the significant progress that individual states have made in regulating the maintenance and use of criminal records.

EMERGING CONSENSUS FOR A DECENTRALIZED SYSTEM

During March and April of 1978, three landmark documents relating to the creation of a workable nationwide criminal history program were published. The documents are:

- *Representative Viewpoints of State Criminal Justice Officials Regarding the Need for a Nationwide Criminal Justice Information Interchange Facility* - U.S. Department of Justice;
- *A Framework for Constructing an Improved National Criminal History Program* - SEARCH Group, Inc; and,
- *A Proposed Concept for a Decentralized Criminal History Record System* - prepared by the CCH Operating Committee and approved by the NCIC Advisory Policy Board.

These three publications are remarkable for the degree of consensus they document. The U.S. Department of Justice, NCIC/APB, and SEARCH all recommend the creation of a decentralized criminal history program. Although there are some operational differences among the positions, they are in essential agreement that policy control must be vested in the participating states.

That these groups, which have a vital interest in creating an improved criminal history program, are tending toward a common position of decentralization is not fortuitous, but the direct result of an active, ongoing debate during which the issues affecting this important program have been addressed and refined and alternatives to the present NCIC/CCH system have been assessed.

Reflecting this direction, the FBI has agreed to move toward the eventual decentralization of the NCIC/CCH program by first studying the impact of returning CCH records to their state of origin, and instituting an identification index at the federal level. The Bureau's intention is to develop data on a number of implementation factors. Although initially confined to "single state offenders," the plan anticipates that the procedure "may subsequently be extended to decentralized multistate offender records."[7]

The burden of success in this test or in any alternative decentralized design rests with the policies which govern the state-to-state exchange of criminal history record information.

POLICY CONTROL IN A DECENTRALIZED CRIMINAL HISTORY EXCHANGE SYSTEM

In the absence of standard procedures, a justice agency wishing to obtain criminal history record information from justice agencies in other jurisdictions faces complicated and often contradictory procedures in the various states. For example, in some states a request for criminal history data must be addressed to the state repository only; in others, a requestor may go directly to local agencies. Where central repositories do not exist, requestors are obligated to inquire of one or more state or local agencies.

In some states a single set of statutory standards govern disclosures by both state and local agencies; in others, statutory provisions set only broad guidelines within which a central agency, or each local justice agency, may have substantial discretion to adopt implementing regulations. In a few states each locality is free to set its own standards without legislative guidance.

Justice agencies find that the data that they can obtain from other states depends upon the dissemination policies and the sealing and purging procedures of the jurisdiction holding the record. Other key policies, such as restrictions on the subsequent use of the data, the responsibility for updating the record and even the definition of a qualified criminal justice agency also differ among the states.

Inconsistency and confusion adversely affect both governments and record subjects. Justice agencies spend more time and more money to receive less criminal history information. Record subjects are at the mercy of variable standards for the maintenance, exchange or dissemination of the data pertaining to them.

The following paragraphs explore how standards for the interstate exchange of criminal history records might be developed.

Donor State Vs. Recipient State Policy

Typically, the interstate exchange, use and re-dissemination of criminal history record information among justice agencies is guided by policies set by both the donor state and the recipient state. The donor state normally makes policies about the kind of criminal history data it will release, the qualifications of recipients and the conditions, if any, under which the data will be exchanged. The recipient state sets policies concerning the maintenance and re-dissemination of the information. In some cases, recipient states apply their own policies to the updating, correcting and sealing/purging of criminal history records received from agencies in other jurisdictions.

Since existing case law usually does not require recipients to apply the recordkeeping rules of the donor, this combination of policies is possible. For example, if a record subject were to sue a recipient agency for improper dissemination of his records, the court would be most likely to apply the law of the jurisdiction which has the most significant relationship to the allegedly unlawful act; the jurisdiction where the agency responsible for the allegedly improper act is located. Thus, the court would apply the law of the recipient jurisdiction, not the law of the donor jurisdiction. The following hypothetical example illustrates the likely result in an invasion of privacy suit against a recipient agency.

Imagine that State A prohibits criminal justice agencies from releasing arrest data more than one year old to non-criminal justice agencies. Statutes in State B expressly provide for public access to arrest records unless the record is two years old.

Suppose a justice agency in State B obtains an arrest record from an agency in State A, and subsequently releases that record to the press--one and one-half years after the date of the arrest. The subject of the record sues the recipient agency for invasion of privacy, arguing that State A's law should apply because the record relates to an arrest that occurred in State A and the record was generated by an agency governed by that law. Despite these arguments, the court is likely to apply the law of State B on the theory that the offending party is an agency governed by the law of State B and the allegedly unlawful disclosure occurred in State B.

What would happen if the record subject sued the donor agency for the recipient's allegedly unlawful disclosure?[8] Could the donor agency, which had legally released information to a recipient agency, be liable for action taken by that agency when the action was lawful under the law of the recipient jurisdiction but unlawful under the law of the donor jurisdiction? No reported decision is directly on point. However, the courts have made clear that both donor agencies and recipient agencies have responsibility and liability for records that are shared between them. In United States v. Mackey,[9] a federal district court held that criminal record information generated by a state criminal justice agency continues to be the property of that agency even after it is shared with the FBI. However, the court held that the FBI was responsible to have in place procedures to insure the accuracy and completeness of data that they receive from other criminal justice agencies. In Utz v. Cullinane,[10] a federal court of appeals panel said that a party suing a donor agency to enjoin that agency (the District of Columbia) from sharing arrest information with a recipient agency (the FBI) and to require the donor agency to seek return of arrest records from the recipient agency, need not also sue the recipient agency. The donor agency was the responsible party.

In Menard v. Saxbe,[11] a federal court of appeals panel held that the FBI must take steps to make certain that agencies to whom they disclose data do not release it improperly. Other courts have said that the primary obligation to insure that data is accurate and complete must fall on the agency that is in the best position to verify the data.[12] Thus, donor agencies must have established procedures to insure, insofar as possible, that recipient agencies do not release inaccurate or incomplete information. Presumably this obligation is met if the donor agency informs recipient agencies of changes in a timely manner, even if a recipient agency fails to incorporate these changes. On the other hand, if a donor agency is on notice that a recipient agency routinely fails to update or correct criminal history information, the donor agency may be liable for the recipient agency's malpractice if it continues to provide information to the recipient agency.[13]

Although the law is by no means clear or fully developed, it does appear from these decisions that a donor agency may be liable to the record subject for misuse of his record by a recipient agency in another jurisdiction even though the law covering the donor agency does not apply to the recipient agency and even though the donor agency is not in a position to control all of the recipient agency's recordkeeping practices.

Three mechanisms have been used to give donor agencies some control of the information practices of recipient agencies. First, a few jurisdictions use contracts or written agreements. These "user agreements" obligate the recipient agency to abide by the donor agency's record management, dissemination and exchange policies. However, in the absence of firm data, the widespread impression among criminal justice recordkeepers is that even when such agreements are signed they are often disregarded. One reason may be the reluctance of donor agencies to take judicial action to enforce these agreements. To date, there is not one reported instance in which a donor agency has sued a recipient agency for breach of a user agreement.

Second, a few justice agencies have

actually stopped exchanging criminal histories with other agencies because the donor disapproved of the recipient's recordkeeping practices. The Massachusetts criminal record repository stopped sending criminal history data to the FBI in part because Massachusetts officials objected to the Bureau's record management and dissemination policies.

Third, at least one state has provided statutory relief to donor states. Nevada recently enacted a statute that obligates its justice agencies to handle criminal history data obtained from a justice agency in another state according to that state's confidentiality policies.[14] This appears to be the first statutory provision of its kind in the nation.

Policy Considerations

One of the primary benefits of a system in which policies set by donor states prevail is the likely improvement in data quality. Donor states are in the best position to insure that their records are accurate and timely. Furthermore, the record subject is most likely to exercise his access rights in the donor jurisdiction. Therefore, the donor agency should be able to disseminate corrections with the assurance that they will be incorporated into the record.

Donor control also is likely to encourage the maximum lawful exchange of criminal histories. Agencies which are assured that their data will be handled according to their rules are more likely to share their information, without fear of liability to record subjects.

On the other hand, some policy arguments favor permitting recipient agencies to handle records according to the law and regulations that apply in their state. Donor state control would pose serious practical problems for recipient agencies. A repository that receives criminal history records from all 50 states and hundreds of local jurisdictions would be required to handle these records according to the policies of the jurisdictions that contributed the records. Few agencies have the administrative, technical or financial resources to comply. Furthermore, recipients of criminal history information may want to apply their own rules as a protection against law suits.

Although minimizing recordkeeping errors appears to be best served by donor control, privacy and due process interests do not appear to be advantaged by one approach more than the other. In any given instance, either a donor's policies or a recipient's policies may be the more protective of subject rights.

As the analysis shows, there are disadvantages to relying on the laws and policy of either the donor or the recipient. A preferable approach would be to develop national standards, agreed to by all participating states.

National Standards

The surest way to implement national standards would be through the enactment of comprehensive federal legislation dealing with the interstate and intergovernmental exchange and dissemination of criminal history record information. In the 1970's, several attempts were made to obtain such legislation. In 1971, the first important criminal records bill, S.2462, was introduced. That bill gave detailed treatment to record dissemination and handling and contained a requirement that telecommunications services used to transmit criminal histories be "dedicated" exclusively to that purpose. It also gave subjects a right to see their criminal history files.

In early 1973, H.R. 188 and H.R. 9783 were introduced. These bills contained confidentiality provisions, including sealing and purging standards, for arrest records. They placed limitations on the exchange of sealed criminal histories among local, state and federal criminal justice agencies.

In late 1973, still more comprehensive criminal justice information system bills were introduced--H.R. 12574/S.2964, H.R. 12575/S.2963 and S.4252. For the first time the Congress had before it compre-

hensive legislation that included standards for criminal justice exchange of data, third party disclosure limitations, and record management standards. Both sets of bills also contained provisions limiting the federal role in interstate systems and insuring policy control of such systems by the participating states.

The bills were the subject of hearings throughout 1974 and attracted considerable attention. Nevertheless, they were not reported out of Committee. Identical bills were reintroduced in the first session of the 94th Congress. Within a few months, the sponsors amended and combined the bills into a single bill, and introduced them into the House and the Senate as H.R. 8227 and S.2008 respectively. In the summer of 1974, both the House and the Senate held extensive hearings on these proposals.

Despite Congressional interest, the bills died in Committee. Opposition to what the media perceived an undesirable tightening of restrictions on public access to criminal justice information is widely blamed. However, the bills were also opposed by some criminal justice officials who believed they would unduly restrict discretion to control record management and disclosure practices.

In the six years since the Congress has given serious consideration to comprehensive criminal justice information legislation, many observers have come to believe that there is little support for legislation that would reach state and local practices or that would place limitations on the exchange of criminal histories among criminal justice agencies. Nevertheless, in the 96th Congress, 2nd Session, the Senate did approve an amendment to the Department of Justice authorization bill (relating to NCIC funding) that would have significant impact on these issues. This amendment provides that:

> "The Attorney General ... shall make arrangements with an appropriate independent entity to prepare and submit ... to the Committees on the Judiciary of the Senate and the House of Representatives a recommendation as to the extent, if any, the Federal Government should provide communications systems, networks, and data bases, for the distribution and use by Federal, State, local or foreign governments or private entities, of records compiled as a result of arrests of individuals or any other criminal records."

The amendment goes on to state that the plan to be developed shall be made in consultation with, and with the recommendation of, an advisory panel consisting of representatives of the Attorney General, the Governors of the states and other users of the system, thus assuring state and local input. Should this proposal surface again in the 97th Congress and become law, the nation will be closer to developing a national program for the exchange of criminal history record information.

If federal legislation cannot be enacted, another vehicle to implement national standards would be needed. One alternative is an interstate compact, a binding legal instrument which establishes formal cooperation among the states.[15] Of all arrangements for interstate cooperation, an interstate compact can be enforced the most effectively. It would establish one law for all the states which became a party to the compact and each state would have to consent to any change in the compact. If a state did not wish to participate in the program it would be barred from access to the sysstem. And, if a state failed to abide by the program's rules, compliance could be mandated by the courts. Any statute that conflicts with an interstate compact can be declared ineffective by the courts and any state court interpretation of the compact provisions can be taken to federal court to promote a uniform interpretation.

Of course, there are other ways to implement national standards. For example, uniform laws could be enacted by all states wishing to participate in an interstate exchange program. However, state legislatures can unilaterally amend these laws and courts may interpret them in ways that destroy their intended uniformity.

FOOTNOTES

[1] See, Hearings and Markups before the Subcommittee on Judiciary of the Committee on the District of Columbia of the House of Representatives, 95th Cong., 1st Sess., on Pretrial Release of Detention, at pp. 6-8 and 23-26; *Some Considerations of Felon Mobility*, Project SEARCH 1970; see discussion on *Social Impacts of the National Crime Information Center and Computerized Criminal History Program*, unpublished report submitted to the Office of Technology Assessment, October 1970.

[2] *An Assessment of the Uses of Information in the NCIC/CCH Program*, Office of Technology Assessment, United States Congress, September, 1979, pp. 187-188.

[3] *Personal Privacy in an Information Society*, the Privacy Protection Study Commission, July 1977.

[4] *Technical Report No. 23, Microcomputers and Criminal Justice: Introducing a New Technology*, SEARCH Group, Inc., December 1978.

[5] 28 CFR, Section 20.20 et. seq. (Subpart B).

[6] Taken from a report prepared by SEARCH for the Federal Bureau of Justice Statistics entitled, *Privacy and Security of Criminal History Information, Trends in Privacy Legislation*, SEARCH Group, Inc., December, 1980, p. 8.

[7] Letter to Senator Edward M. Kennedy for FBI Director William H. Webster, January 7, 1980.

[8] Case law suggests that the subject could sue the donor agency in either State A or State B. In Maney v. Ratcliff, 399 F. Supp. 760 (E.D. Wis. 1975), the court said that a criminal record subject harmed by an NCIC disclosure in Wisconsin of a record generated by the Baton Rouge, Louisiana, Police Department could sue that Department in Wisconsin.

[9] 87 F. Supp. 1121 (D. Nev. 1975).

[10] 520 F2d 467 (D.C. Cir. 1975).

[11] 498 F.2d 1017 (D.C. Cir. 1974).

[12] See for example, Testa v. Winquist, 451 F. Supp. 388 (D.R.I. 1978).

[13] However, donor agencies have some control over recipient agencies' accuracy and completeness practices. Recipient agencies have an obligation to have procedures in place to assure that criminal history data is complete and accurate. In discharging this responsibility, recipient agencies are obligated to take into account updating and amending information furnished by the agency that created the record. The recipient agency's obligation to maintain complete and accurate data is based on the LEAA Regulations, constitutional considerations and provisions in their own statute law. The courts have not said that an agency in State B accepting data from an agency in State A is thereby bound by the accuracy and completeness provisions in State A's law. In other words, a recipient agency must take advantage of updating and correcting information offered by the donor agency (or even

seek out such information) not as a result of requirements imposed by the donor state, but rather as a result of requirements imposed by federal law, constitutional law or its own statutory law. (See, for example, Tarlton v. Saxbe, 507 F.2d 1116 (D.C. Cir. 1974)... "The FBI has a duty to take notice of responsible information furnished by local law enforcement agencies." (at 1129))

[14] Nev. Rev. Stat, Sec. 179A.

[15] *Advisory Bulletin No. 8: The Feasibility of an Interstate Compact for Exchanging Criminal History Information*, SEARCH Group, Inc., April, 1980.

END

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