

**NR\_key\_name:** 203682F2DF1F1272852563FF006C6EEA  
**SendTo:** CN=Jeremy Gunn/O=ARRB @ ARRB;CN=Ron Haron/O=ARRB @ ARRB  
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**From:** CN=Phil Golrick/O=ARRB  
**DisplayFromDomain:**  
**DisplayDate:** 12/13/1996  
**DisplayDate\_Time:** 2:58:41 PM  
**ComposedDate:** 12/13/1996  
**ComposedDate\_Time:** 2:44:23 PM  
**Subject:** FBI compliance issues  
I spoke with Carol Keeley this afternoon. She advised that there is "some disagreement" on whether she should be the compliance official designated by the FBI, so the designation letter is being held up. She told me that the letter would also raise two concerns about the compliance program as outlined in our letter: (a) whether it is necessary to identify each lower-level employee involved in searching for assassination records (this is a point Carol had previously raised with Ron and me; at that time we told her that we could readily accommodate a compliance statement that identified only supervisory personnel, or identified searchers by organizational unit (especially for field office searches)); (b) whether a compliance deposition would be redundant of the compliance statement. Carol said that the draft letter that is being worked on states in effect that the FBI will make people available to answer particular questions as they arise, but expresses reservations about a "general" compliance deposition.  
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