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COURSE: (TS//SI//NF) OVSC1205 Special Training on FISA (Analytical)
COURSE: (TS//SI//NF) OVSC1206 Special Training on FISA (Technical)

Module 3: (U) Establishing Reasonable Articulable Suspicion (RAS)

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FRAME ID: 3010	**(U) Module 3**

(U) Establishing Reasonable Articulable Suspicion (RAS)

(U) This module will enable you to:

- (TS//SI//NF) Recognize the direct relationship between the Foreign Powers and establishing RAS
- (TS//SI//NF) Identify the key components of RAS and how it is applied to candidate identifiers
- (TS//SI//NF) Identify who can adjudicate and approve a RAS nomination
- (TS//SI//NF) Recognize the requirement associated with identifiers linked to U.S. persons – the OGC First Amendment Review
- (TS//SI//NF) List common sources of information used to construct a RAS nomination statement

NEXT FRAME ID: 3020

BACK FRAME ID: n/a

ALT TAG:

GRAPHIC/AV:
(U) Present learning objectives in the travel journal

(TS//SI//NF) (OGC Attorney): This part of our trip will provide you with an overview of the Reasonable Articulable Suspicion (RAS) Standard including definitions and descriptions to help you understand how to satisfy RAS and how to apply it to identifiers under the BR and PR/TT FISC Orders. In addition to this training, guidance is also outlined in a RAS memo that can be obtained from the Office of General Counsel.

(TS//SI//NF) This module will enable you to:
- (TS//SI//NF) Recognize the direct relationship between the Foreign Powers and establishing RAS
- (TS//SI//NF) Identify the key components of RAS and how it is applied to candidate identifiers

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- (~~TS//SI//NF~~) Identify who can adjudicate and approve a RAS nomination
- (~~TS//SI//NF~~) Recognize the requirement associated with identifiers linked to U.S. persons – the OGC First Amendment Review
- (~~TS//SI//NF~~) List common sources of information used to construct a RAS nomination statement

(~~TS//SI//NF~~) At the conclusion of this module you should understand that an identifier must be RAS-approved before conducting a query. The topic of querying BR and PR/TT bulk metadata will be discussed in Module 4.

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(TS//SI//NF) Who can be targeted under the BR and PR/TT authorities?

FRAME ID: 3020

(TS//SI//NF) The ████ Foreign Powers named in these authorities are ████████████ ████████████████████████████

NEXT FRAME ID: 3030

BACK FRAME ID: 3010

(TS//SI//NF) NSA is not permitted to query the BR and PR/TT metadata unless there is a reasonable articulable suspicion that the identifier is associated with one of the FISC-approved groups.

ALT TAG:

GRAPHIC/AV:
(U) Insert graphics/animations to illustrate the umbrella groups and their affiliated terrorist organizations
(U) Add graphics to illustrate contact chaining, seeds, and hops.

(TS//SI//NF) (OGC Attorney): The BR and PR/TT Orders list by name the Foreign Powers that we are permitted to target under each authority. T███ Foreign Powers are ████████████████████████████████████ The Orders list in great detail ████████ ██████████████████████████████████████ NSA is not permitted to query the BR and PR/TT metadata unless there is a reasonable articulable suspicion that the identifier is associated with one of the FISC-approved groups.

(TS//SI//NF) It is important to note that you cannot query using just any foreign intelligence target. Furthermore, you cannot query using just any terrorist target. You CAN however query using identifiers specifically linked to ████████████████████████████████████ ██████████ as named in the Orders. Note that the lists may evolve and your target may be added or removed over time, so you should reference the most current version of the lists for updates.

DATE/PREPARER: 11/09/2010 SLS	Topic (U) What is RAS?	Page Classification TOP SECRET//COMINT//NOFORN	Screen Number 3 of 13

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FRAME ID: 3030	**(U) What is Reasonable Articulable Suspicion (RAS)?**
NEXT FRAME ID: 3035	
BACK FRAME ID: 3020	
ALT TAG:	
GRAPHIC/AV: (U) Display pop-up with the definition of RAS as it is discussed.	

(U) Reasonable Articulable Suspicion (RAS) Standard

(TS//SI//NF) An identifier will meet the Reasonable Articulable Suspicion Standard if based on the factual and practical considerations of everyday life on which reasonable and prudent persons act, there are facts giving rise to a reasonable articulable suspicion that the identifier is associated with one of the specified Foreign Powers.

– Foreign Intelligence Surveillance Court

(TS//SI//NF) (OGC Attorney): The FISC recognizes the potential counterterrorism advantage gained through analysis of the BR and PR/TT bulk metadata; however, because there is a great deal of U.S. person information included in the bulk metadata, the FISC has set strict guidelines on when and how analysts can access the metadata under these authorities. The RAS standard is one of these guidelines which helps to provide reasonable assurance that only legitimate terrorism-related identifiers are used to query the bulk metadata. This standard must be met before queries can be conducted.

(TS//SI//NF) So what is RAS? RAS is a legal standard that describes the measure of proof required to support a decision whether to permit an identifier to be queried from the bulk metadata. The Reasonable Articulable Suspicion standard requires just that-a suspicion that you can explain in a reasonable way. It does not require certainty, but is more concrete than a simple hunch. It may be easiest to think of it in terms of other standards with which you may be familiar.

(TS//SI//NF) Many of you may be familiar with legal standards of proof applicable in other situations. It may be helpful to understand how the RAS standard compares to these other legal standards. For example, a jury in a criminal case will not convict an accused unless the evidence of guilt is "beyond a reasonable doubt. "This is the highest legal standard of proof. A jury in a civil case (such as a personal injury case or a contract dispute) might award a plaintiff money damages if the plaintiff proves the elements of his claim by "a preponderance of the evidence." This standard is lower than "beyond a reasonable doubt." Lower still is the standard of proof required to justify issuance of a search warrant – "probable cause" – whether that search warrant is for the suspect's home or the content of the suspect's communications. The RAS standard falls below "probable cause."

(TS//SI//NF) The FISC has determined that this lower standard of proof is reasonable for the querying of metadata because communications metadata does not carry with it the same privacy protections as communications content. The RAS standard falls below "probable cause" but above a mere hunch or guess.

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FRAME ID: 3035

NEXT FRAME ID: 3040

BACK FRAME ID: 3030

ALT TAG:

GRAPHIC/AV:
(U) Continue to display definition of RAS then pull out the RAS Equation.

(U) The RAS Equation

(U) (Continue to display definition of RAS then pull out the RAS Equation.)

Reasonable Articulable Suspicion (RAS) Standard

(TS//SI//NF) An identifier will meet the Reasonable Articulable Suspicion Standard if based on the factual and practical considerations of everyday life on which reasonable and prudent persons act, there are facts giving rise to a reasonable articulable suspicion that the identifier is associated with one of the specified Foreign Powers."

– Foreign Intelligence Surveillance Court

RAS Equation

Identifier + Link to Foreign Power = RAS

(TS//SI//NF) (OGC Attorney): As it applies to the BR and PR/TT Orders, RAS is a suspicion that an identifier, such as an email address, telephone number, or other identifier type, is associated with one of the ███ Foreign Powers named in BR and PR/TT Orders ████████████████████████ The FISC requires that NSA base that suspicion on a certain level of factual evidence -- and NSA must *articulate* those facts that connect the identifier with one of the named terrorist organizations. The requirement that these facts be *articulable* effectively provides reasonable assurance that analyst queries of the metadata are based on substantive information (meaning more than simple hunches or uninformed guesswork). So in order to obtain RAS approval for an identifier, analysts must provide enough factual evidence that it would lead a reasonable person to suspect that an identifier is associated with one of the named Foreign Powers in the BR and PR/TT Orders. We will get more into the kinds of facts that may be used and how they can support a RAS nomination later in this module.

(TS//SI//NF) In summary, based on the factual and practical considerations of everyday life, where reasonable and prudent persons act, we must first determine if there is a reasonable articulable suspicion that the identifier is associated with ████████████████████████ ████████████████████ named in the Orders. There must be at least one qualifying fact giving rise to the suspicion that the identifier is associated with one of the Foreign Powers listed in the BR and PR/TT Orders. Unless that determination is made, the identifier cannot be approved to query this metadata repository. NSA's implementation of the BR and PR/TT Orders mandates that the RAS nomination statement must clearly link the identifier/target to one of the Foreign Powers and document this finding in ████████ which will be discussed later in the module.

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NEXT FRAME ID: 3050

BACK FRAME ID: 3035

ALT TAG:

GRAPHIC/AV:
(U) Analyst Level of Effort Required graphic

(TS//SI//NF) (HMC Character): From an Analysis and Production standpoint, let's look at RAS in the context of the analyst level of effort required to utilize BR and PR/TT and other SIGINT authorities. As the illustration shows, the level of effort required by an analyst to establish RAS would normally be considered less than that required for FBI CT FISA or FAA 704/705b, but it is more than what is needed to utilize E.O. 12333, for example.

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NEXT FRAME ID: 3060

BACK FRAME ID: 3040

ALT TAG:

GRAPHIC/AV:

(U) Who can make a RAS determination?

(U) Who can make a RAS determination?

- (U//~~FOUO~~) Homeland Mission Coordinators (HMCs)

- (U//~~FOUO~~) Chief of the CT Homeland Security Analysis Center

- (U//~~FOUO~~) Deputy Chief of the CT Homeland Security Analysis Center

(U) No one else can make this determination!

(~~TS//SI//NF~~) (OGC Attorney): The FISC states that the RAS decision is based on considerations of "reasonable and prudent persons." This does not, however, mean that anyone can approve an identifier for RAS. There are a select number of people within NSA who have been given the authority to approve identifiers for querying under these two authorities. Those individuals are called Homeland Mission Coordinators or HMCs.

(~~TS//SI//NF~~) (HMC Character): As was just mentioned, RAS determinations are typically made by specially trained personnel in the Office of Counterterrorism and its Extended Enterprise; these individuals are titled Homeland Mission Coordinators, typically abbreviated as HMCs. These individuals, like me, have been given special training on how to apply the RAS standard and how to apply it consistently. HMCs are specially trained individuals who have extensive experience working with this target set and who have extensive experience working with these authorities. The HMCs can take a RAS nomination, review the facts, and make a determination as to whether or not that particular identifier meets the RAS standard.

(~~TS//SI//NF~~) (HMC Character): According to the BR and PR/TT Orders, in addition to the HMCs, the Chief and Deputy Chief of the Counterterrorism Homeland Security Analysis Center are authorized to make a RAS determination; although, it is generally the HMCs who make the RAS determinations. To reemphasize, no one else is authorized to make RAS determinations according to the Orders.

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NEXT FRAME ID: 3070

BACK FRAME ID: 3050

ALT TAG:

GRAPHIC/AV:
(U) Use images from the OVSC1204 course for the First Amendment Rights

(U) OGC Requirement to review U.S. person identifiers

> **(U) First Amendment Rights**
> - Religion
> - Speech
> - The press
> - Peaceable assembly
> - To petition the government for redress of grievances

(TS//SI//NF) (HMC Character): There are certain identifiers that require an extra RAS review/approval step. As you might imagine, those are the identifiers that are reasonably believed to be used by U.S. persons. Why does this matter? It matters because the U.S. Government is forbidden from regarding a U.S. person as associated with a Foreign Power solely because he or she is exercising his or her First Amendment rights.

(TS//SI//NF) (OGC Attorney): That's right. Any identifier believed to be used by a U.S. person must be forwarded to the OGC by a Homeland Mission Coordinator following his or her approval. An OGC attorney will review the RAS nomination, as well as the RAS decision made by the Homeland Mission Coordinator, and make a determination as to whether or not NSA is targeting that individual based solely on activities that are protected by the First Amendment to the Constitution. If there is any indication that the RAS is based solely on information or evidence protected somehow by the First Amendment, OGC will require additional information to support the RAS nomination.

(TS//SI//NF) (HMC Character): If you are an analyst, should you abandon a RAS nomination if there is a potential First Amendment concern? Absolutely not. The presence of First Amendment evidence does not invalidate a RAS, it just cannot be the sole basis for a nomination. The OGC review is really transparent to the analyst, though it is a part of the process that you should be aware of.

DATE/PREPARER: 11/09/2010 SLS	**Topic** (U) Sources of Information Used to Jusitfy RAS	**Page Classification** TOP SECRET//COMINT//NOFORN	**Screen Number** **8 of 13**
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NEXT FRAME ID: 3080

BACK FRAME ID: 3060

ALT TAG:

GRAPHIC/AV:

(U) What sources of information can be used to justify RAS?

(TS//SI//NF) FISA Orders

- Existing FISA Orders

(TS//SI//NF) Reports and/or RAW SIGINT

- SIGINT reports
- FISA surveillance data derived from other authorized targets
- Raw SIGINT (after a Reporting Source Validation Check)
- SIGDEV Work
- Other transcripts

(TS//SI//NF) IC and Public Sector

- Federal Bureau of Investigation documents
- Central Intelligence Agency documents
- National Counterterrorism Center documents
- Documents from other U.S. Government Organizations
- Foreign Partner nations
- Public records available on the internet, newspapers, or other public resources

(TS//SI//NF) (HMC Character): So now let's look at the type of evidence that can be used to justify RAS. NSA can use any information that is lawfully in our possession. A published SIGINT report describing the results of electronic surveillance of a target might be more reliable than say pocket litter found during a detainee's interrogation -- but NSA can rely on any lawfully held evidence. The HMCs are responsible for assessing the quality and reliability of the evidence.

(TS//SI//NF) (OGC Attorney): Sources that are often used to justify a RAS nomination include, but are not limited to:
- Existing FISA Orders
- SIGINT reports
- FISA surveillance data derived from other authorized targets
- SIGINT traffic, as long as the submitting analyst has performed a Reporting Source Validation Check
- SIGDEV work (with verified sources), and
- Other transcripts

(TS//SI//NF) (OGC Attorney): If an analyst/requestor uses unpublished query results in a RAS justification, and they classify the material appropriately as ███████████████ then that information will only be visible to those ███████ users with ███████████ or ███████████ credentials, as confirmed via ███████

(TS//SI//NF) (OGC Attorney): The following IC and public sector (open source) sources are also examples of sources that are frequently used:

- Federal Bureau of Investigation (FBI) documents
- Central Intelligence Agency (CIA) documents
- The National Counterterrorism Center (NCTC) documents
- Documents from other U.S. Government Organizations
- Foreign Partner nations, and
- Public records available on the internet, newspapers, or other public resources.

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FRAME ID: 3080	**(TS//SI//NF)** ▮▮▮▮ **NSA's RAS Identifier Management System**
NEXT FRAME ID: 3090	
BACK FRAME ID: 3070	
ALT TAG:	• (TS//SI//NF) Supports the Homeland Defense Counterterrorism (CT) Mission.
GRAPHIC/AV: E6\E62 Learning Technologies\NOFORN Course Development\Requirement_196_OVS C_1205_BR-PRTT\Graphics ▮▮▮▮_txt40.jpg	• (TS//SI//NF) Provides the ability to request, justify, review, approve/disapprove RAS nominations/requests. • (TS//SI//NF) Is the authoritative source for the list of RAS-approved identifiers and will export that list to other systems that require it. • (TS//SI//NF) Provides metrics and other information to facilitate oversight review and report generation for the Department of Justice (DOJ) and the FISC. (U) Time Bounded Approvals

(TS//SI//NF) (HMC Character): Remember from earlier in this module, we introduced the RAS process as a simple equation: identifier + link to Foreign Powers = RAS. Now you may be wondering how an identifier is nominated for RAS. NSA must demonstrate and document that ev▮▮▮▮er used to query the bulk metadata meets the RAS standard *PRIOR* to querying the BR and PR/TT bulk metadata repositories. NSA created ▮▮▮▮, the RAS identifier management tool, to streamline the adjudication of the RAS nomination statements and documentation of RAS determinations.

(TS//SI//NF) (HMC Character): Typically, an intelligence analyst will gather the necessary information and draft the nomination statement in IRONMAN articulating the RAS equation. An HMC, also using ▮▮▮▮ will review the nomination statement and approve or disapprove the request. If the nomination statement is for a U.S. person, the ▮▮▮▮ tool includes functionality that allows the HMCs to forward such requests to OGC for the required First Amendment review. In either case, if the RAS nomination is approved, the identifier is now authorized for querying.

(TS//SI//NF) (OGC Attorney): Through ▮▮▮▮ NSA documents all RAS-approved identifiers as well as the rationale used to gain RAS approval. IRONMAN provides the ability to ▮▮▮▮stify, review, approve/disapprove RAS nominations. ▮▮▮▮ is therefore the authoritative source for the list of RAS-approved identifiers, and ▮▮▮▮exports that list to other systems that require it.

(TS//SI//NF) (OGC Attorney): It is important to remember that copies of the documents, such as court orders or reports, are required as part of the nomination process. The paper trail should enable an auditor from Department of Justice (DOJ) to clearly evaluate all of the evidence presented to support a RAS decision.

(TS//SI//NF) (OGC Attorney): NSA has overseers, specifically the DOJ National Security Division attorneys, who examine the factual support for our RAS decision process. They take a look at any notes that the HMCs or someone within the NSA OGC may have included, and they decide whether or not we have properly applied the RAS standard to all of the identifiers that are used to query the bulk metadata. So it is critical that we take great care throughout the process, gathering and presenting the evidence and applying the RAS standard in a consistent manner across all identifier nominations. ██████ also provides metrics and other information to facilitate this oversight review and report generation for the DOJ and the FISC.

(TS//SI//NF) (OGC Attorney) The Court recognizes that occasionally, NSA may have information suggesting that a target may have used a particular identifier only for a limited time. In such cases, an HMC can determine that the RAS standard is met for the specific timeframe that the identifier was believed to be used by the target. Such instances are considered Time Bounded and are uniquely dealt with in ████████ Analysts encountering targets under these circumstances should consult with an HMC on how to proceed.

DATE/PREPARER: 11/09/2010 SLS	Topic (U) Lifespan of a RAS Approval	Page Classification TOP SECRET//COMINT//NOFORN	Screen Number 10 of 13

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FRAME ID: 3090

NEXT FRAME ID: 3100

BACK FRAME ID: 3080

ALT TAG:

GRAPHIC/AV:
(U) Use a graphic to show effective dates for U.S. and non-U.S. person RAS approval

(U) (Show passing of time and then a graphic of an identifier with a "RAS-APPROVED" or "DENIED" applied over the identifier)

(U) What is the Lifespan of a RAS Approval?

- (TS//SI//NF) RAS determinations for foreign identifiers are legally effective for one year. NSA CT has implemented guidance that requires RAS review/re-approval every 180 days.

- (TS//SI//NF) Although a RAS determination for an identifier reasonably believed to be used by a United States person is legally effective for 180 days, NSA CT has implemented guidance that requires RAS review/re-approval every 90 days.

- (TS//SI//NF) After the sunset of an identifier's RAS approval -- or anytime before -- the identifier can be submitted for RAS revalidation through the same process.

(TS//SI//NF) (HMC Character): RAS approvals have sunset or expiration dates which analysts must comply with. Currently a RAS approval on a foreign identifier, per the FISC, is legally valid for one year. However, NSA CT has taken a conservative approach and implemented guidance that mandates RAS review and re-approval every 180 days. Likewise, a RAS approval for an identifier believed to be used by a U.S. person has a legal lifespan of 180 days per the FISC, but NSA CT has implemented guidance requiring review and re-approval every 90 days. It is the analyst's responsibility to monitor the sunset dates and take appropriate actions before the RAS nomination expires.

(TS//SI//NF) (HMC Character): Any identifier can be resubmitted for revalidation at any time. Revalidations require proof of the same categories of information that was required for the original request. Revalidations should try to validate that the original evidence is still true by presenting any new documentation to demonstrate that the identifier is still associated with the Foreign Powers named in the Orders. It is up to the HMCs to make an informed revalidation, based on the totality of the evidence. If you are uncertain of your evidence, submit the nomination anyway and work with the HMCs through the process.

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FRAME ID: 3100

NEXT FRAME ID: 3110

BACK FRAME ID: 3090

ALT TAG:

GRAPHIC/AV:

(U) Knowledge Check

1. (TS//SI//NF) Why is the link between the target and the Foreign Powers an essential part of the RAS nomination?
    a) (TS//SI//NF) It is a key component in reaching the 'probable cause' standard
    b) (TS//SI//NF) It is representative of the terrorist centric scope of the BR and PR/TT authorities as noted in the FISC Orders
    c) (U) Because it is required by USSID SP0018 and DoD 5240.1-R
    d) (U) Because it is required in a DIRNSA Memo

2. (TS//SI//NF) The RAS standard requires that what two facts are articulable?
    a) **(TS//SI//NF) The identifier can be tied to a terrorist target and that target can be tied to** ███
    b) (TS//SI//NF) The identifier is not used by a U.S. person and they are engaged in terrorist activities
    c) (TS//SI//NF) The identifier can be tied to a target and that target is affiliated with ███████
    d) (TS//SI//NF) The query can be traced back to the analyst who submitted it and the identifier is associated with any terrorist group.

(U) (HMC Character): Let's check what you remember from this topic!

ANSWERS:
Question 1: (TS//SI//NF) Correct! The link between the target and the Foreign Powers is an essential part of the RAS nomination because it is representative of the terrorist centric scope of the BR and PR/TT authorities as noted in the FISC Orders.
(TS//SI//NF) Incorrect. The correct answer is b). The link between the target and the Foreign Powers is an essential part of the RAS nomination because it is representative of the terrorist centric scope of the BR and PR/TT authorities as noted in the FISC Orders.

Question 2: (TS//SI//NF) Correct! The RAS standard requires that the following two facts are articulable:
• The identifier can be tied to a terrorist target, and
• That target can be tied to ███████████
(TS//SI//NF) Incorrect. The correct answer is a). The RAS standard requires that the following two facts are articulable:
• The identifier can be tied to a terrorist target, and
• That target can be tied to ███████████

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BACK FRAME ID: 3100

ALT TAG:

GRAPHIC/AV:
(U) Knowledge checks in the travel journal

(U) Knowledge Check

3. (TS//SI//NF) Who may make a RAS determination?
   a) (TS//SI//NF) A Homeland Mission Coordinator (HMC) or an attorney with the Department of Justice
   b) (TS//SI//NF) An HMC or other official named in the Orders
   c) (TS//SI//NF) Any reasonable and prudent analyst (and OGC if identifier is believed to be used by a U.S. person)
   d) (TS//SI//NF) Only a judge from the FISC

4. (TS//SI//NF) Which source of information may be used to justify RAS?
   a) (TS//SI//NF) SIGINT reports
   b) (TS//SI//NF) Open source information
   c) (TS//SI//NF) Second Party reports
   d) (TS//SI//NF) All of the above

5. (TS//SI//NF) What additional requirement is needed for an identifier reasonably believed to be used by a U.S. person?
   a) (TS//SI//NF) Must be reviewed by the Attorney General
   b) (TS//SI//NF) Must be reviewed by the Chief of the Homeland Security Analysis Center
   c) (TS//SI//NF) Must be reviewed by OGC
   d) (TS//SI//NF) Two HMCs must agree on the RAS determination

(No audio or transcript on this page)

Question 3: (TS//SI//NF) Correct! An HMC or other official named in the Orders may make a RAS determination.
(TS//SI//NF) Incorrect. The correct answer is b). An HMC or other official named in the Orders may make a RAS determination.

Question 4: (TS//SI//NF) Correct! SIGINT reports, open source information, and Second Party reports may all be used to justify RAS.
(TS//SI//NF) Incorrect. The correct answer is d). SIGINT reports, open source information, and Second Party reports may all be used to justify RAS.

Question 5: (TS//SI//NF) Correct! If an identifier is reasonably believed to be used by a U.S. person, then it must be reviewed by OGC.
(TS//SI//NF) Incorrect. The correct answer is c). If an identifier is reasonably believed to be used by a U.S. person, then it must be reviewed by OGC.

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FRAME ID: 3120	(U) Now that we have completed this part of your trip you should be able to:
	• (TS//SI//NF) Recognize the direct relationship between the Foreign Powers and establishing RAS
NEXT FRAME ID: n/a	• (TS//SI//NF) Identify the key components of RAS and how it is applied to candidate identifiers
	• (TS//SI//NF) Identify who can adjudicate and approve a RAS nomination
BACK FRAME ID: 3110	• (TS//SI//NF) Recognize the requirement associated with identifiers linked to U.S. persons – the OGC First Amendment Review
ALT TAG:	• (TS//SI//NF) List common sources of information used to construct a RAS nomination statement
GRAPHIC/AV: (U) Review learning objectives in the travel journal	

(TS//SI//NF) (HMC Character): So remember, RAS nominations are approved by an HMC (or an official named in the Order) BEFORE queries can be made using a particular identifier within the BR or PR/TT metadata.

(U) (OGC Attorney): Now that we have completed this part of the trip you should be able to:
- (TS//SI//NF) Recognize the direct relationship between the Foreign Powers and establishing RAS
- (TS//SI//NF) Identify the key components of RAS and how it is applied to candidate identifiers
- (TS//SI//NF) Identify who can adjudicate and approve a RAS nomination
- (TS//SI//NF) Recognize the requirement associated with identifiers linked to U.S. persons – the OGC First Amendment Review
- (TS//SI//NF) List common sources of information used to construct a RAS nomination statement