



Northern Mariana Islands

Drug Threat Assessment



National Drug Intelligence Center
U.S. Department of Justice



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Northern Mariana Islands Drug Threat Assessment

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Preface

This report is a strategic assessment that addresses the status and outlook of the drug threat to the Northern Mariana Islands. Analytical judgment determined the threat posed by each drug type or category, taking into account the most current quantitative and qualitative information on availability, demand, production or cultivation, transportation, and distribution, as well as the effects of a particular drug on abusers and society as a whole. While NDIC sought to incorporate the latest available information, a time lag often exists between collection and publication of data, particularly demand-related data sets. NDIC anticipates that this drug threat assessment will be useful to policymakers, law enforcement personnel, and treatment providers at the federal, state, and local levels because it draws upon a broad range of information sources to describe and analyze the drug threat to the Northern Mariana Islands.

Northern Mariana Islands Drug Threat Assessment

Executive Summary

Illicit drugs are smuggled into the Commonwealth of the Northern Mariana Islands (CNMI) for local distribution. Law enforcement officials report that illicit drugs, particularly crystal methamphetamine, are smuggled from Asia, Hawaii, and the U.S. mainland to the islands. Cannabis continues to be cultivated locally in small quantities, but most marijuana is smuggled from neighboring countries. Drugs smuggled into the Northern Mariana Islands often are transported via couriers aboard commercial aircraft and in air cargo. Individuals in the CNMI also use maritime vessels and package delivery services to smuggle small quantities of illicit drugs into the CNMI for their personal use.

Methamphetamine, specifically crystal methamphetamine, poses a significant drug threat to the CNMI. Local authorities report that the distribution and abuse of crystal methamphetamine increased notably during the 1990s. In recent years purity levels have remained constant as prices have dropped—an indicator of rising availability. Crystal methamphetamine typically is transported into the CNMI from Asian countries, often transiting the Philippines and Guam. Various ethnic criminal groups—Chamorro, Chinese, Filipino, and Japanese—and residents of CNMI distribute crystal methamphetamine in the CNMI. Potential violence related to the distribution of crystal methamphetamine is a concern, particularly as organized criminal groups that distribute the drug become more entrenched.

Marijuana is readily available and commonly abused in the CNMI. The marijuana available in the CNMI typically is smuggled from sources in the Philippines or the Republic of Palau. Some is produced locally; however, local production decreased from 2000 to 2001 as a result of law enforcement efforts.

The availability and abuse of **heroin** are limited in the CNMI. The small amounts of Southeast Asian heroin that are available typically are consumed by tourists, not residents.

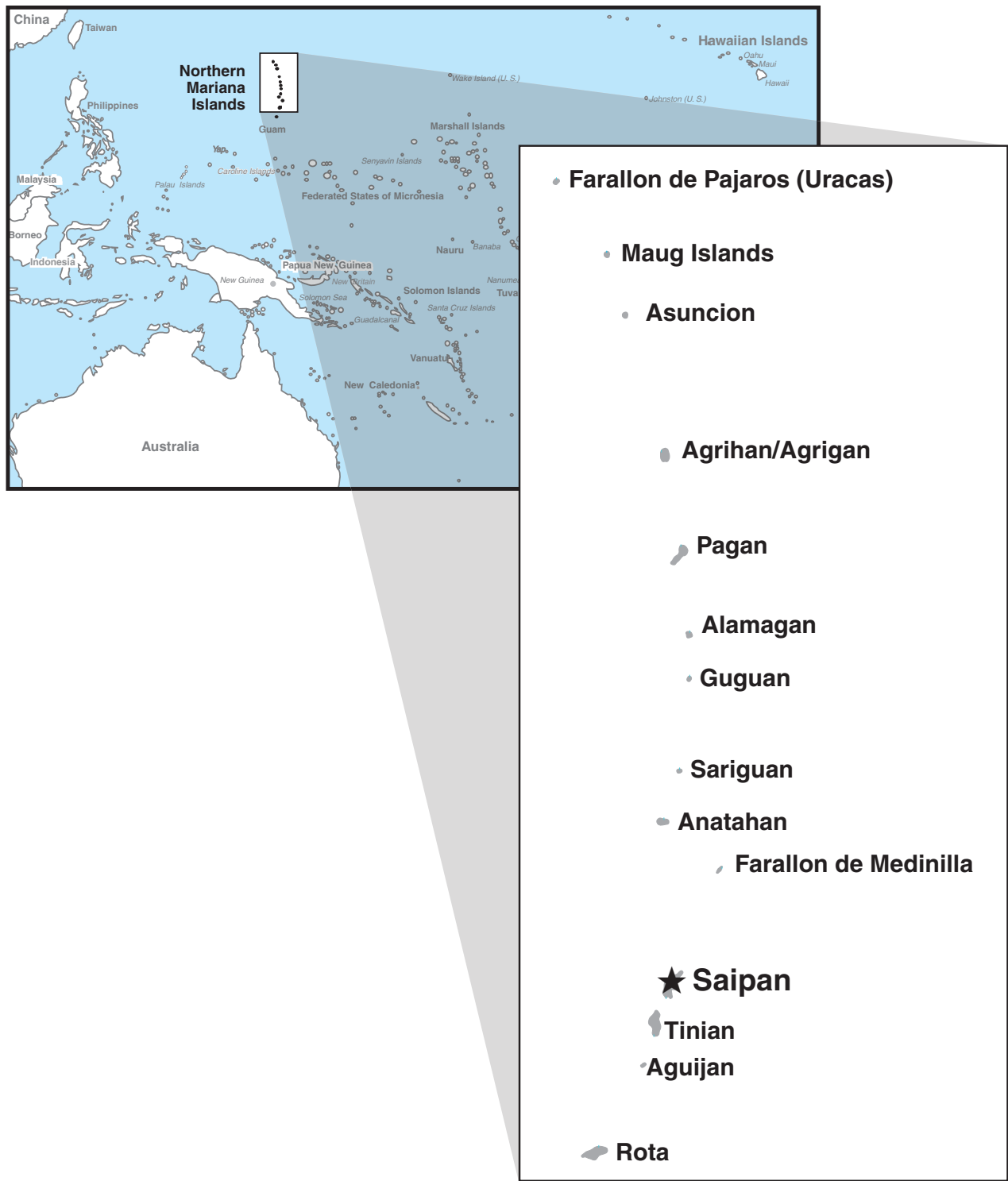
Historically the availability of **cocaine** in the CNMI has been minimal, and abuse is limited. Typically the small quantities of cocaine available in the CNMI are smuggled onto the islands by individual abusers. Although little is known about the individuals or groups involved in transporting or distributing cocaine in the CNMI, law enforcement

officials suspect that Mexican criminal groups that distribute methamphetamine on the U.S. West Coast are involved.

Other dangerous drugs (ODDs) such as inhalants, MDMA, LSD, and diverted pharmaceuticals pose a very small threat to the CNMI. In 1999 law enforcement officers reported the first known incident of MDMA abuse and conducted their first LSD investigation. Inhalants pose a greater threat to young people in the CNMI than any other ODD; however, law enforcement authorities expect the threat posed by MDMA and LSD to surpass the threat posed by inhalants. Law enforcement authorities in the CNMI are attempting to minimize the threat from diverted prescription drugs by increasing their efforts to prohibit Chinese-labeled pharmaceuticals (most of which have been illegally obtained) from entering the commonwealth.

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Northern Mariana Islands.

Note: This map displays features mentioned in the report.



Northern Mariana Islands Drug Threat Assessment

Overview

The Commonwealth of the Northern Mariana Islands (CNMI) is part of the Mariana Island archipelago, which also includes Guam. The 500-mile-long, 14-island chain that composes the CNMI includes the islands Agrihan/Agrigan, Alamagan, Anatahan, Aguijan, Asuncion, Farallon de Medinilla, Farallon de Pajaros (Uracas), Guguan, Maug Islands, Pagan, Rota, Saipan, Sariguan, and Tinian. The CNMI is situated between Hawaii and the Philippines and is approximately 1,300 miles south of Tokyo, Japan. Saipan is the principal island in the chain, the commercial center, and the commonwealth's capital. The location of the islands in the Pacific Ocean provides easy access to many Asian countries: China (including Hong Kong), Indonesia, Japan, Korea, Laos, Myanmar, the Philippines, Taiwan, and Thailand.

The CNMI became a U.S. commonwealth in 1975. CNMI citizens neither pay U.S. taxes nor have the right to vote in U.S. elections. Approximately 30,000 of the nearly 70,000 people who live in the CNMI are U.S. citizens; most other residents are foreign workers. Approximately 25,000 people are native to the CNMI. Temporary workers from Bangladesh, China, India, Japan, Korea, and the Philippines are permitted to enter the CNMI; however, they are not free to enter the United States, and their presence on the islands

Fast Facts

Northern Mariana Islands

Population (2000)	69,221
Land area	183 square miles
Capital	Saipan
Principal islands	Saipan, Tinian
Principal industries	Garment manufacturing, tourism

does not constitute residency toward obtaining U.S. citizenship. Children born to foreign workers on the islands do receive automatic U.S. citizenship and are free to enter the United States.

Garment manufacturing and tourism are the major industries in the CNMI. The garment industry has grown rapidly as a result of duty benefits stemming from the relationship between the CNMI and the United States. Garments manufactured in the CNMI carry a "Made in the USA" label and typically are not inspected by the U.S. Customs Service (USCS) upon their arrival at mainland ports. Foreign investments by Korea- and Hong Kong-based businesses also have contributed to the rapid economic growth, particularly on Saipan.

The garment industry recruits workers from Asia because of the limited supply of local labor. Only about 20 percent of garment industry workers are native to the CNMI.

Until 1998, tourism was the principal industry of the CNMI and generated the most revenue. The islands, as well as most of Asia, suffered an economic crisis during fiscal year (FY) 1998. As a consequence, the number of tourists visiting the CNMI decreased from 694,888 in 1997 to 490,165 in 1998. The number of tourists increased to 528,597 in 2000 and further increased in the first 8 months of 2001—signaling that the economy was rebounding. However, the events of September 11, 2001, caused another downturn in tourism, resulting in lower government revenues and reduced working hours or layoffs for many tourism industry workers. The tourism industry still employs 50 percent of the workforce but is no longer the chief industry of the CNMI.

Members of organized crime syndicates engage in drug distribution and money laundering. The development of gambling establishments that are loosely regulated—such as a large casino on Tinian that is geared toward wealthy Asian gamblers—offers fertile ground for criminal activities. Inconsistent reporting requirements for cash and wire transfers from regulated financial institutions to unregulated institutions allow the syndicates to easily access Asian underground banking systems. One violent Japanese organized criminal group, the Yakuza, has succeeded in penetrating CNMI business markets, particularly the tourism industry, according to USCS. The growing presence of Japanese tourists in the CNMI enables these Japanese criminals to blend with the local population.

Marijuana is the most widely abused illicit drug in the CNMI; however, the abuse of crystal methamphetamine increased dramatically during the last decade. Nearly all of the recent drug investigations conducted in the Pacific Islands involved the distribution of crystal methamphetamine. Most of the crystal methamphetamine smuggled into the CNMI is produced in Asian source areas; however, law enforcement investigations have revealed ties to crystal methamphetamine distributors in California.

Other drugs also are available in the CNMI. Heroin and cocaine are available, although abuse is minimal. Authorities recently revealed that smugglers brought cocaine to the CNMI and distributed free samples of the drug in a failed attempt to establish a market. Law enforcement agencies reported only one LSD investigation in the CNMI during 1999. They increasingly note the abuse of common household products being used as inhalants by young people in the CNMI.

Law enforcement authorities are concerned about an increase in violence linked to illicit drugs, especially crystal methamphetamine. Drug distribution and abuse have precipitated an increase in the commission of crimes including assault, burglary, robbery, extortion, and murder. In 2000 the Department of Public Safety on Saipan recorded 13 drug-related arrests and 83 offenses in which drugs were involved.

Intelligence Gaps in Drug Abuse Data

Intelligence gaps concerning the threat of illegal drugs in the CNMI are numerous and wide-ranging. The government of the CNMI lacks the resources necessary to track trends in drug trafficking and abuse and indicates that the picture of the drug situation in the CNMI is incomplete. Most national data sets, including the Treatment Episode Data Set, the Drug Abuse Warning Network, the Youth Risk Behavior Survey, and the Monitoring the Future study, do not include the CNMI in their data collection, and other studies give the commonwealth only cursory mention, making quantification of the drug threat difficult.

CNMI officials report that the facilities, equipment, personnel, and training necessary to provide treatment and rehabilitation services to substance abusers in the commonwealth are inadequate. These authorities recognize the growing threat that illegal drugs pose to the commonwealth; however, many express frustration about the lack of attention that grant-awarding programs and the U.S. federal government devote to the illicit drug problem in the CNMI.

The Drug Enforcement Administration (DEA) established a task force with local authorities in 1996 to combat illicit drugs in the CNMI. From its inception through February 2002, the DEA/CNMI Task Force arrested a total of 122 individuals and seized 25.0 kilograms of crystal methamphetamine, 9.8 kilograms of marijuana, 17.5 kilograms of heroin, 14.0 ounces of cocaine,

and 1.4 ounces of LSD. DEA assigned a second special agent to the CNMI in June 1999.

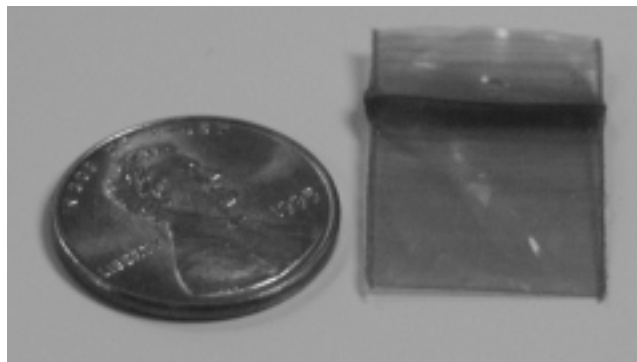
In May 2000 the DEA/CNMI Task Force increased its efforts to prohibit pharmaceuticals bearing Chinese labels from entering the commonwealth. Such pharmaceuticals are not labeled in accordance with local or federal laws, making them illegal. Law enforcement authorities suspect that much of this supply has been obtained illegally.

Methamphetamine

Methamphetamine, specifically crystal methamphetamine, poses a significant drug threat to the CNMI. Methamphetamine abuse increased in the CNMI in the 1990s. Most abusers in the CNMI prefer crystal methamphetamine, known as ice or shabu, to the powdered form of the drug. Law enforcement authorities report that many wholesale and retail crystal methamphetamine distributors also abuse the drug. The Community Guidance Center currently counsels more than 270 patients—about 58 percent of its caseload—for crystal methamphetamine abuse. Despite the significance of this threat, a 1999 student survey conducted by the Community Guidance Center (formerly the Division of Mental Health and Social Services) in the CNMI revealed that approximately 5 percent of students in grades 7 through 12 had used methamphetamine at least once, compared with the national rate of approximately 9 percent as reported by the Youth Risk Behavior Survey.

Violence related to crystal methamphetamine abuse poses a significant concern to law enforcement agencies in the CNMI. Along with the increase in crystal methamphetamine abuse in the 1990s, there was a corresponding increase in violent crime, particularly domestic assaults. According to the Secretary of the Department of Public Health, this increase in domestic violence can be attributed directly to the increase in abuse of illicit drugs, especially methamphetamine. Methamphetamine abusers are prone to become violent, particularly when suffering from withdrawal symptoms. Many robberies in the CNMI also have been associated with the increase in crystal methamphetamine abuse.

The price of crystal methamphetamine has decreased, and the purity has remained stable at high levels, indicating that the drug may be increasingly available. In 1999 crystal methamphetamine sold for as much as \$1,000 per gram; in 2001 the price decreased to \$500 to \$600 per gram. At the retail level the drug often is packaged in a glassine bag that contains one-tenth of a gram (known as a plate) and sells for \$100. (See Figure 1.) From 1996 to 2002, crystal methamphetamine purity remained stable, ranging from 94 to 99 percent.



NDIC

Figure 1. Size comparison of a penny and a plate.

The DEA/CNMI Task Force seized a total of 25 kilograms of crystal methamphetamine from 1996 through February 2002. In 2001 law enforcement authorities made a significant seizure of 1.8 kilograms of crystal methamphetamine. Another seizure occurred in September 2001, when DEA/CNMI Task Force officers seized more than 212 grams of crystal methamphetamine, along with 77 grams of marijuana, from a CNMI resident who was distributing the drugs on Saipan.

Table 1. Percentage of Methamphetamine-Related Federal Drug Sentences, CNMI and United States, FY1997–FY2001

	CNMI	United States
FY1997	100.0	10.2
FY1998	91.6	11.4
FY1999	100.0	12.8
FY2000	100.0	14.5
FY2001	100.0	12.4

Source: U.S. Sentencing Commission.

Nearly all drug investigations and federal sentences in the CNMI involve crystal methamphetamine. From FY1997 through FY2001 methamphetamine-related federal sentences constituted 100 percent of all drug-related federal sentences in the CNMI every year except FY1998. According to U.S. Sentencing Commission (USSC) data, of the 43 drug-related federal sentences during this period, 42 were methamphetamine-related, and 1 (in FY1998) was heroin-related. During the same period methamphetamine-related federal sentences nationwide constituted a much smaller percentage of federal drug-related sentences, ranging from a low of 10.2 percent to a high of 14.5 percent. (See Table 1.)

There has been no reported production of methamphetamine in the CNMI. Crystal methamphetamine is smuggled into the CNMI from Japan, Taiwan, and China, often via the Philippines and Guam. (See Figure 2.) Criminal groups in Southeast Asia smuggle crystal methamphetamine to the CNMI via the Philippines using couriers on commercial aircraft, package delivery services, and commercial maritime vessels. In June 2000, authorities at the Saipan airport arrested a South Korean man carrying 4 pounds of crystal methamphetamine. The man had traveled from Korea to the Philippines to obtain the crystal methamphetamine and then had smuggled the drug to Saipan via Guam.

According to local law enforcement officials, members of Inagawa-Kai, a subgroup of the

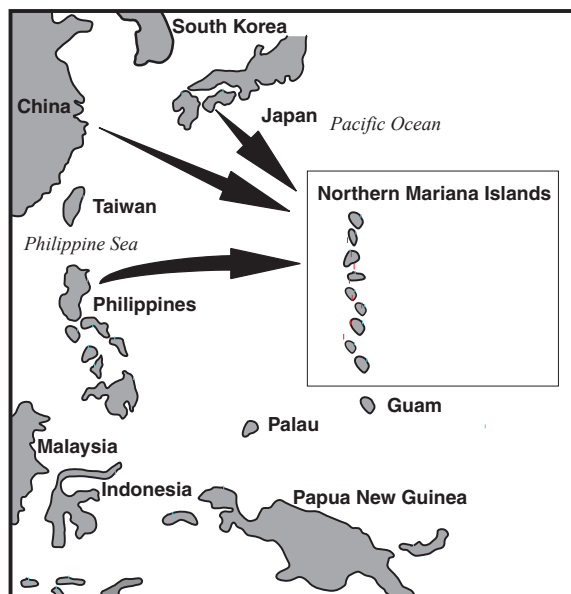


Figure 2. Methamphetamine transportation to the Northern Mariana Islands from Asia.

Yamaguchi-Gumi, the most violent subgroup of the Yakuza, recruit couriers to smuggle crystal methamphetamine to the CNMI from Asian countries via the Philippines. These couriers transport most of the crystal methamphetamine to the CNMI aboard commercial aircraft. In many cases the couriers are unwitting accomplices who are offered a vacation in Saipan in return for transporting a package or other item to Saipan. The crystal methamphetamine often is hidden in the shafts of golf clubs, in bottles of shampoo, or in other items that are then given to the couriers. After arriving in the CNMI, couriers typically stay in a hotel room for up to a week until they are contacted by an individual who retrieves the package. The Yakuza also reportedly transports handguns to the CNMI along with shipments of crystal methamphetamine, increasing the potential for violence related to the drug.

Maritime vessels also are used to transport crystal methamphetamine to the CNMI, although no recent seizures of methamphetamine from commercial maritime vessels have been reported.

A small amount of the methamphetamine available in the CNMI is produced in California and Mexico and transported to the commonwealth

via Hawaii. (See Figure 3.) Mexican criminal groups transport methamphetamine to Hawaii using couriers aboard commercial aircraft, and then transport portions of these shipments to the CNMI where the methamphetamine is distributed for a greater profit than in Hawaii. According to DEA, some of these Mexican criminal groups convert powdered methamphetamine to crystal methamphetamine in Mexico and the United States before transporting the drug to Hawaii.

Japanese criminal groups are the primary distributors of crystal methamphetamine in the CNMI. Chamorro, Filipino, and Chinese criminal groups also distribute the drug. These criminal groups, who sell the drug to lower-level dealers, typically distribute only to family members or

members of similar ethnic communities. Crystal methamphetamine typically is sold in 1-gram or one-tenth-gram quantities, depending on the level of distribution. Local residents distribute crystal methamphetamine from private residences but usually only to individuals they know or who have been referred to them.

In a typical distribution scenario, Japanese criminals (Yakuza members or associates) arrive on Saipan and retrieve crystal methamphetamine from couriers they have employed. These criminals, who often recruit taxi drivers as retail distributors in Saipan, remain on the island for about a week while the drug is being distributed. Some Japanese criminals become familiar with purchasers and on subsequent trips to Saipan distribute the drug themselves.

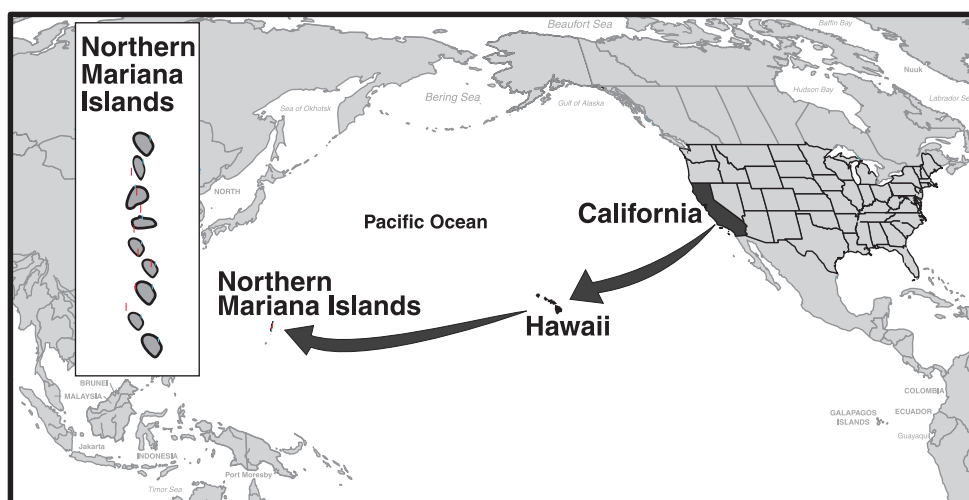


Figure 3. Methamphetamine movement from California to Hawaii to the Northern Mariana Islands.

Marijuana

Marijuana is readily available and widely abused in the CNMI; however, it is difficult to quantify the extent of marijuana abuse due to the lack of drug abuse statistics and marijuana-related survey data for the CNMI.

From 2000 to 2001 law enforcement eradication efforts caused a decrease in local cannabis cultivation, and distributors had to obtain most of their marijuana from sources outside the commonwealth. As a result, prices increased dramatically.

A joint (0.5 gram), also known as a stick, of marijuana sold for an average price of \$2.50 from 1997 to 1999 when supplies of locally produced marijuana were plentiful. The price of a joint subsequently increased to \$20 to \$50. In addition, sandwich bags (nickel and dime bags) of marijuana have been replaced by 1-inch-square, resealable bags containing small quantities of marijuana that sell for \$20 to \$35 each. Tourists typically are charged higher prices for retail quantities of

marijuana than are local residents. At the wholesale level in Saipan, marijuana sells for approximately \$1,500 per pound.

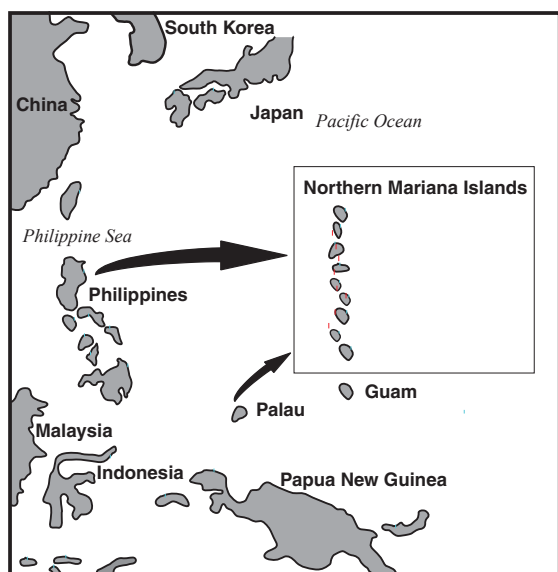


Figure 4. Marijuana transportation from the Philippines and Palau to the Northern Mariana Islands.

As a result of strong eradication efforts by law enforcement, cannabis cultivation in the CNMI is primarily limited to small quantities intended for personal use. CNMI authorities now focus on undercover operations, controlled purchases, and border interdiction.

According to the Department of Public Safety Criminal Investigation Bureau, marijuana is transported to the CNMI by criminal groups that cultivate cannabis in the Philippines and the neighboring island of the Republic of Palau. (See Figure 4.) Filipino criminal groups typically transport marijuana in cargo containers aboard commercial maritime vessels. Criminal groups from Palau generally pay couriers to transport marijuana concealed on their bodies or packed in coolers. Local cultivators in the CNMI also transport small quantities of marijuana from island to island.

Law enforcement authorities report that marijuana is distributed throughout the CNMI; however, there is no available information regarding the individuals or groups involved in retail-level marijuana distribution.

Heroin

The availability and abuse of heroin are limited in the CNMI. The small amounts of Southeast Asian heroin that are available typically are consumed by tourists, not residents. There is no evidence of heroin addiction among the CNMI resident population.

Southeast Asian heroin is the most common type of heroin available in the CNMI. Since the 1970s the Guam Crime Laboratory, the only laboratory in the area that analyzes and identifies drugs, has examined heroin samples from the CNMI and identified all of them as Southeast Asian heroin.

Heroin sells for \$35 to \$50 per gram at the retail level in the commonwealth. Current information regarding the purity of the heroin distributed in the CNMI is not available.

According to USSC data, from FY1996 through FY2001 there was only one federal sentence (in FY1998) for heroin-related violations in the CNMI. There is no evidence to link heroin distribution or abuse with violent crime in the CNMI.

There is no available information regarding the individuals or groups involved in retail-level heroin distribution in the CNMI. However, the Asian criminal groups that distribute crystal methamphetamine in the CNMI likely are involved, at least to some extent, in heroin distribution.

Cocaine

The abuse of cocaine in the CNMI is limited. Small quantities of powdered cocaine may be consumed, and there is no evidence of crack cocaine abuse in the CNMI.

Historically cocaine availability in the CNMI has been low, and the drug is rarely seized in the commonwealth. The DEA/CNMI Task Force seized a total of 14 ounces of cocaine from 1996 through February 2002. The largest seizure of cocaine in the CNMI occurred in March 1990, when law enforcement agents arrested a Tinian resident in possession of approximately 14 grams of cocaine at the Guam International Airport. He was returning to the CNMI on a flight that originated in Honolulu, Hawaii.

Most of the cocaine available in the CNMI is smuggled onto the islands by nonresidents for personal consumption. These individuals typically

smuggle small quantities of cocaine aboard commercial aircraft. They also use package delivery services to transport cocaine to the commonwealth in small amounts.

Cocaine is rarely distributed in the CNMI, and there is no information regarding the groups or individuals involved in distributing the drug. However, according to DEA, Mexican groups involved in the transportation of methamphetamine from the West Coast of the United States likely play some role in the distribution of cocaine in the CNMI. In the rare instances when cocaine is distributed, a gram sells for \$150 to \$250. According to the CNMI Customs Service, in the past, criminal groups have given away small quantities of cocaine to test the potential market for the drug.

Other Dangerous Drugs

Other dangerous drugs (ODDs) such as inhalants, MDMA, LSD, and diverted pharmaceuticals pose a very low threat to the CNMI.

MDMA. Law enforcement authorities in the CNMI reported the first known use of MDMA (3,4-methylenedioxymethamphetamine, also known as ecstasy) on the island of Saipan in 1999. Authorities in Guam suspect that some U.S. military personnel are responsible for transporting MDMA from the U.S. mainland to Guam and possibly to the CNMI. MDMA is a synthetic, psychoactive drug with amphetamine-like and hallucinogenic properties. Users say MDMA, sometimes called the hug drug, makes them feel good. However, the drug may cause negative effects such as confusion, depression, sleep problems, anxiety, paranoia, and long-term and sometimes permanent damage to parts of the brain that are critical to thought and memory.

LSD. Law enforcement officials have reported only one LSD (lysergic acid diethylamide) investigation in the CNMI in 1999. The DEA/CNMI Task Force seized a total of 1.4 ounces of LSD in

this investigation. LSD is a hallucinogen that induces abnormalities in sensory perceptions. The physical effects include dilated pupils, higher body temperature, increased heart rate and blood pressure, sweating, loss of appetite, sleeplessness, dry mouth, and tremors. LSD abuse also can result in long-term disorders. LSD typically is taken by mouth and is sold as pills, capsules, liquid, and pieces of paper that have absorbed the drug.

Inhalants. Some young people in the CNMI experiment with inhaling easily accessible products such as glue, gasoline, typewriter correction fluid, lacquer thinner, fabric protector, nonflammable fluorocarbons, spray paint, cooking spray, nitrous oxide, and butane. In August 1995 a 15-year-old boy lost consciousness and died after he sniffed butane gas for nearly 3 hours. This death was the first attributed to inhalant abuse in the CNMI. In response to this incident, the CNMI House of Representatives passed a bill banning the sale of products that can be used as inhalants to individuals 16 years and younger. Violation of this law carries a penalty of \$500.

Diverted Pharmaceuticals. Law enforcement authorities in the CNMI are attempting to minimize the threat from diverted prescription drugs by increasing their efforts to prohibit Chinese-labeled pharmaceuticals (most of which have been illegally obtained) from entering the commonwealth.

In May 2000 numerous pharmaceuticals bearing Chinese labels were seized in the CNMI. None were labeled in accordance with local or federal laws, rendering them illegal. Authorities suspected that many of these pharmaceuticals were intended for distribution in the CNMI.

Outlook

The availability and abuse of crystal methamphetamine will continue to increase in the CNMI, and a corresponding rise in violent crime also is expected. A similar pattern of availability, abuse, and violence has occurred in Hawaii and, more recently, in American Samoa. Crystal methamphetamine will continue to be transported from Asian sources, typically transiting the Philippines and Guam before reaching the CNMI.

Marijuana will remain the most widely available and commonly abused drug in the CNMI. Some cannabis will continue to be cultivated for personal consumption, but most marijuana will continue to be transported from the Philippines and the Republic of Palau.

The abuse of heroin will remain largely limited to the tourist population. The availability of heroin will remain limited in the CNMI.

The distribution and abuse of cocaine likely will remain limited in the CNMI. Individual abusers will continue to smuggle small quantities of the drug into the commonwealth for personal consumption. Local authorities expect to occasionally encounter small criminal groups attempting to create a market for the drug.

ODDs, including inhalants, MDMA, LSD, and diverted pharmaceuticals, will continue to pose a comparatively minor threat; however, law enforcement authorities anticipate a slight increase in the availability and abuse of diverted pharmaceuticals.

Sources

Commonwealth

Commonwealth of the Northern Mariana Islands

Department of Finance

Division of Customs Service

Department of Public Health

Department of Public Safety

Criminal Investigation Bureau

Office of the Attorney General

Criminal Division

Community Guidance Center

Guam Police Department

Crime Laboratory

Saipan Tribune

www.cnmi-guide.com

www.saipan.com

National

U.S. Department of Health and Human Services

Centers for Disease Control and Prevention

Youth Risk Behavior Survey

National Institutes of Health

National Institute on Drug Abuse

Community Epidemiology Work Group

U.S. Department of Homeland Security

U.S. Coast Guard

District 14

U.S. Department of Justice

Drug Enforcement Administration

Los Angeles Division

DEA/CNMI Task Force

Honolulu District Office

Office of Justice Programs

Bureau of Justice Assistance

Edward Byrne Memorial State and Local Law Enforcement Assistance Program

U.S. House of Representatives

Committee for the Northern Mariana Islands, testimony by Nicholas M. Gess, Associate Deputy Attorney General, Department of Justice, 16 September 1999

U.S. Senate

Northern Mariana Islands Covenant Implementation Act

U.S. Sentencing Commission

Other

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