

Intelligence Reform: An Open Letter to New Director of National Intelligence the Honorable John Ratcliffe

By [Peter Pry](#)

Dear DNI Ratcliffe:

Congratulations on your appointment as the Director of National Intelligence, the nation's top intelligence officer, responsible for overseeing and coordinating the intelligence community, comprising intelligence offices in 17 U.S. departments and agencies

1. Office of the Director of National Intelligence
2. Central Intelligence Agency
3. National Security Agency
4. Defense Intelligence Agency
5. Federal Bureau of Investigation
6. State Department Bureau of Intelligence and Research
7. Department of Homeland Security
8. Drug Enforcement Agency
9. Treasury Office of Intelligence and Analysis
10. Department of Energy
11. National Geospatial-Intelligence Agency

12. National Reconnaissance Office
13. U.S. Air Force
14. U.S. Army
15. U.S. Navy
16. U.S. Marine Corps
17. U.S. Coast Guard

Condolences too, DNI Ratcliffe, on your appointment when the intelligence community is in a profound and unprecedented crisis, desperately in need of monumental reform.

Some of the most essential parts of the intelligence community were weaponized by the Obama Administration to frame President Donald Trump with false allegations of “colluding with Russia” to win election. They sought to delegitimize the Trump Administration, cripple President Trump’s ability to govern through endless investigations, and set-up a legitimately elected President of the United States for impeachment on false charges concocted by the intelligence community. [!]

Leaders of what amounted to an attempted coup d’etat against President Trump included DNI General James Clapper, CIA Director John Brennan, and FBI Director James Comey. The coup attempt included a phony January 2017 Intelligence Community Assessment designed to tar President Trump as Russia’s “Manchurian Candidate”—the spurious Intelligence Community Assessment has still not been recalled—and a so-called counterintelligence program “Crossfire Hurricane” of international dimensions.

DNI Ratcliffe, your job #1 should be to root out and purge from service in the intelligence community anyone who, knowingly or unknowingly, participated in the coup plot.

Hundreds of agents and intelligence officers must have been involved. Their participation, wittingly or unwittingly, is a breach of their oath to uphold and defend the Constitution and signifies, at a minimum, judgment so harmful and so destructive that they might as well have been working for Russia and China.

DNI Ratcliffe, your job #2 should be to begin organizing the termination of the Office of the Director of National Intelligence (ODNI). The ODNI has not only failed in its original purpose to improve intelligence but has overseen a string of major intelligence failures, has politicized intelligence to support the "politically correct" worldview of the Obama Administration, which was probably a significant contributing factor to ODNI's leadership of the coup plot. Only Congress can abolish the ODNI, but your support and preparation for abolition would help make it happen.

DNI Ratcliffe, your job #3 should be reforming the intelligence community's culture to minimize "groupthink" that is so often responsible for major intelligence failures. Senior analysts should be empowered to express their unvarnished individual views as intelligence products, published under their names so they can get credit, or blame, for the accuracy or inaccuracy of their analysis. Intellectual diversity should be immediately introduced to counteract intelligence community "groupthink" and "political correctness" by sponsoring competitive and alternative analysis by "Team-Bs" by independent analysts and "politically incorrect" conservative think tanks like the Center for Security Policy, National Institute for Public Policy, Hudson Institute, and the Heritage Foundation. Some examples of major intelligence failures resulting from "groupthink" and "political correctness":

- Climate Change is the greatest existential threat to the United States and the world, according to an intelligence community brainwashed by the Obama Administration, despite skepticism by President Trump and copious evidence from climate scientists that the alleged “impending climate catastrophe” is a hoax.[\[ii\]](#)
- The intelligence community has consistently underestimated North Korea's intercontinental missile and nuclear weapons programs in the spring of 2017, alleging North Korea was still years away from developing an ICBM that could strike anywhere in the mainland U.S. and a decade away from an H-bomb. A few months later, in the summer of 2017, North Korea demonstrated both.[\[iii\]](#)
- The ODNI's unclassified 2019 “Worldwide Threat Assessment” made no mention of the existential threat from natural (solar) or manmade electromagnetic pulse (EMP), despite recent warnings by the EMP Commission in 10 unclassified reports, heeded by President Trump who has issued a series of executive orders designed to protect the national electric grid and other life-sustaining critical infrastructures from EMP and cyber-attacks (the latter grossly underestimated in the 2019 “Worldwide Threat Assessment”).[\[iv\]](#)
- **The ODNI refuses to recall the deeply erroneous classified Obama-era Joint Atomic Energy Intelligence Committee report on EMP (2014), which continues circulating doing grave damage to national EMP preparedness, despite rebuttal by the EMP Commission.**
One of the six core recommendations of the EMP Commission is to recall the erroneous JAEIC EMP Report, which so far has been ignored by ODNI.[\[v\]](#)

- The intelligence community is cocksure Iran does not yet have nuclear weapons or nuclear-armed missiles, despite evidence to the contrary.[\[vi\]](#) Their assessment implicitly, if not explicitly, supports President Obama's Iran nuclear deal, the Joint Comprehensive Plan Of Action (JCPOA), from which President Trump has wisely withdrawn.

Purge the Intelligence Community

Far too many intelligence community leaders and managers are incompetent, arrogant, and entrenched. More dangerous than the incompetence of the intelligence community is their hostility to President Trump and attempted coup d'état that imperiled the Constitution, described above.

Treasonous corruption cannot have been limited to the top leadership of the intelligence community. The complex "Russia Hoax" orchestrated with foreign actors and the ongoing "resistance" to President Trump manifested by illegal leaks and betrayals by National Security Council staffers from the intelligence community, indicates the rot runs deep.

Protecting our constitutional republic from the totalitarian mindset manifested by a politicized and out-of-control intelligence community justifies and may even require draconian action—like firing everyone remotely connected with the coup attempt, or even purging wholesale everyone in the intelligence community Senior Executive Service, and promoting replacements from below.

Intellectual diversity is far more important to a healthy and trustworthy intelligence community than the diversity of race and sexual preference, the latter has long been the intelligence

community's obsessive focus. Too many intelligence officers come from inside the "Washington bubble" and radicalized universities, so the intelligence community worldview is skewed leftward.

Intellectually, the intelligence community should look more like Main Street USA.

The "best and brightest" do not all live in Washington or graduate from Harvard. "Flyover America"— that used to be known as the American Heartland— has plenty of untapped talent to man the ramparts of the intelligence community, including former and serving military officers, police, and detectives, national security experts from Air University (Maxwell AFB, Georgia), the U.S. Army War College (Carlisle, Pennsylvania), and international relations scholars from heartland universities and colleges, for example.

The less the intelligence community resembles the faculty lounge at Harvard, the more intelligence assessments will start getting the world right. And intelligence officers from Main Street USA, whose worldview is built around the Constitution and not *Das Kapital*, will be a bulwark against a future coup d'etat.

Abolish the Office of the Director of National Intelligence (ODNI)

President George W. Bush and Congress established the 9/11 Commission to find out: What led to the September 11, 2001 terror attacks that killed 3,000 Americans? How could such a massive intelligence failure happen? What are the deep systemic flaws within the intelligence community that need to be fixed?

The 9/11 Commission found three big problems in the intelligence community:

1. "Stove-piping": The failure of intelligence agencies to share information with each other.
2. "Groupthink": A tendency in the intelligence community toward intellectual homogeneity, a lack of competitive analysis, a lack of diverse views and opinions.
3. HUMINT: Weak human intelligence, too few spies, too much reliance on satellites, no sources penetrating al Qaeda or other terrorist organizations.

The 9/11 Commission made recommendations to fix these deep-rooted problems in the intelligence community.[\[vii\]](#) The Commission's primary solution was to create an "intelligence czar" to be called the Director of National Intelligence (DNI) armed with his own organization, the Office of the Director of National Intelligence (ODNI). The DNI has legal and budgetary authority to force the various intelligence agencies to cooperate and share information.

Many disagreed with the wisdom of establishing a DNI and ODNI to run the intelligence community.

Ambassador R. James Woolsey, former Director of Central Intelligence (DCI) at CIA, warned that the DCI was already capable of coordinating the intelligence community, and creation of an ODNI could suppress analytical diversity and reinforce "groupthink."

Former House Intelligence Committee member Rep. Ray LaHood (R-Ill.) cautioned: "I believe creating a national intelligence director is a huge mistake...it's another bureaucracy, it's another

layer of government. It would not have prevented 9/11, and it will not prevent another 9/11."[\[viii\]](#)

The President's Commission on the Intelligence Capabilities of the United States Regarding Weapons of Mass Destruction, which delivered its report on March 31, 2005, also had reservations regarding a DNI. The bipartisan commission—which faulted the intelligence community for massive intelligence failures estimating WMDs in Iraq—called for deep and rapid reform of the intelligence community, but was not enthusiastic about the idea of an intelligence czar. The Commission pointedly noted that the DNI was established “about halfway through our inquiry” and “became a sort of *deus ex machina* in our deliberations...While we might have chosen a different solution.”[\[ix\]](#)

Critics of establishing the DNI and ODNI have been proven right.

The ODNI has solved none of the problems in the intelligence community that resulted in 9/11 and the deaths of 3,000 Americans. Indeed, ODNI has made intelligence performance worse.

Subordinating the agencies under ODNI has reinforced the dangerous proclivity toward “groupthink” and “political correctness” by discouraging what little analytical diversity exists among the agencies. In the end, when the ODNI controls everyone's budget, all want their intelligence to please the “czar.” Predictably, controversial views that displease the ODNI do not long survive.[\[x\]](#)

Fred Fleitz, former Chief of Staff and Executive Secretary of the National Security Council until 2018, who was himself on the

short-list of candidates to be the next DNI, has written an excellent article “America Does Not Need A Director of National Intelligence” (Center for Security Policy, March 23, 2020) explaining why the DNI and ODNI should be abolished:

- “The record is clear that creating the DNI has made America less safe. Centralization of the intelligence community forced a surge in groupthink and risk-averse intelligence analysis. Bureaucratic culture and intellectual integrity fell victim to an enforced politicization and virtue signaling. Intelligence professionals with different perspectives fell silent, were pushed aside or penalized, or retired early.”[\[xi\]](#)
- “According to a 2016 Heritage Foundation report, since the creation of the DNI position, intellectual and bureaucratic decay resulted in a series of intelligence failures. Those included failure to predict the Arab Spring, the resurgence of al-Qaeda, the adventurism of Putin, the aggressiveness of China, and a number of terrorist attacks on the U.S....”[\[xii\]](#)
- “On top of all that, a priority of ODNI officials over the past 10 years has been to force politically correct policies on intelligence professionals, and imposing pop culture issues like climate change and social fads as major functions of America’s spy services.”[\[xiii\]](#)
- “ODNI spending and personnel have grown like deformities since 2004. ‘In classic government agency fashion, the ODNI quickly self-bloated, requesting 1,500 highest-salaried Senior Executive Service (SES) billets and becoming a promotions playground for the Intelligence Community,’ former assistant FBI director Ken Brock wrote recently in The Hill. ‘For comparison purposes, the FBI, 20 times larger, has 200 to 300 SES positions...’”[\[xiv\]](#)

- “President Trump has been skeptical of the ODNI as a wasteful and out-of-control bureaucracy since the beginning of his presidency. His concerns grew over the past three years after repeated inept and politicized activity by Intelligence Community officers. These included DNI Dan Coats’ unclassified congressional testimony last year undermining the president’s diplomacy with North Korea, the discredited and debunked January 2017 Intelligence Community Assessment on Russian meddling in the 2016 presidential election, politically driven leaks by intelligence officers to hurt the elected leader of the country, and the so-called CIA whistleblower whose actions sparked the impeachment proceedings against President Trump. This whistleblower now reportedly works for the ODNI.”[\[xv\]](#)

Although an act of Congress will be necessary to abolish the ODNI, Fleitz makes excellent suggestions about steps President Trump and new DNI Ratcliffe can take to reduce ODNI’s damaging influence: “As many as 2,000 ODNI staff are on detail from other intelligence agencies. They can be sent back to their home agencies immediately. Many ODNI bureaucracies like the National Counterproliferation Center, the ODNI Cyber Threat Intelligence Integration Center, and the regional and functional mission managers should be shut down. The National Intelligence Council and the Presidential Daily Brief should be sent back to the CIA.”[\[xvi\]](#)

Reforming Intelligence Community Analytical Culture

“Groupthink” and the tendency toward intellectual homogeneity stem primarily from the way the intelligence community conducts analysis, not from its organization. The bottom line is

that if intelligence community managers remain the same, and if the culture of intelligence analysis is not changed, the intelligence community will continue "business as usual."

Sources of "Groupthink": Intelligence agencies and the intelligence community as a whole place a high premium on "speaking with one voice." The theory is that policymakers want "an answer" from individual intelligence agencies and from the intelligence community as a whole, and do not want to be "confused" with multiple, conflicting views. Advocates of "speaking with one voice" argue that the intelligence community is a practical arm of government, not an academic institution and that offering a diversity of views would reduce the value of the intelligence community to policymakers. Intelligence managers fear that policymakers would not be pleased to hear a cacophony of voices from the intelligence community, but would prefer firm, solid, and single answers.

Consequently, intelligence agencies place a high premium on producing an "agency view" or "corporate view" on major intelligence issues. Likewise, the intelligence community, as a whole, attempts to produce an intelligence community view—a single view that all intelligence agencies can support—in National Intelligence Estimates. Although National Intelligence Estimates and individual agency reports allow for dissenting views, these are discouraged and usually placed in footnotes. There is enormous pressure to keep dissent in intelligence products to a minimum.

Another motive for a uniform "corporate view" is that intelligence agencies, like all bureaucracies, have vested interests. The outcome of particular intelligence issues often

does have important implications for the size of intelligence budgets and for future opportunities for the various intelligence agencies.

What analytical and intellectual diversity exists within the intelligence community grows from the rivalry between agencies defending their particular interpretations of intelligence that tend to support their own bureaucratic interests. There is tremendous pressure within intelligence agencies to conform to the corporate view. Indeed, analysts are already motivated to adhere to the corporate view, since their own careers depend on the success and importance of their particular agency.

“Groupthink” Leftward Bias: “Groupthink” has a leftward analytical bias strongly reinforced by eight years of Obama Administration leadership that had a radical New Left worldview. Intelligence community leaders, managers, and analysts have been rewarded and promoted for “political correctness,” which is why the intelligence community worldview so closely conforms to that of the Democrat National Committee. Thus, “climate change” is supposedly a greater threat to the United States than the nuclear arsenals of Russia, China, and North Korea.

“Groupthink” in the intelligence community tends to embrace several core optimistic assumptions that account for why their threat assessments are so often wrong, and they are so often surprised:

- Nuclear weapons and missile proliferation depend largely on a nation’s indigenous technology because Russia and China are unlikely to help rogue state nuclear and missile programs.

- Cheating on arms control treaties is likely to be only marginal, not large-scale, so the constraints of arms control provide a good guide for estimating adversary military capabilities.
- U.S. National Technical Means ensures "what you see is what you get" in terms of the dimensions of adversary nuclear and missile threats, making it highly unlikely adversaries can conceal a large clandestine nuclear missile force.
- U.S. technology is the best in the world, so technological surprise by potential adversaries is unlikely.
- Underestimating threats is better than overestimating, as the former is cautious, prudent, and professional, whereas the latter is unprofessional and alarmist.

Coordination as "Groupthink": The intelligence community and intelligence agencies impose "groupthink" on intelligence officers through a process called "coordination." Coordination attempts to build consensus within first an intelligence agency and then within the entire intelligence community.

At the agency level, intelligence reports must be coordinated; that is, submitted for peer review by all other analysts who have an interest in the issue. However, the coordination process does not involve merely soliciting the opinions of others. Without corporate consent, the analyst cannot publish his report. Finally, once peer review is accomplished, the intelligence report must be coordinated with managers in the branch, division, and office of the particular intelligence agency.

At the intelligence community level, in the National Intelligence Council, where National Intelligence Estimates are produced, a similar process of coordination occurs. National Intelligence

Estimates attempt to build consensus between agencies on intelligence issues. As noted earlier, dissenting footnotes are sometimes allowed, but strongly discouraged. The National Intelligence Council goes to great lengths to negotiate between agencies so that differences can be blurred and a National Intelligence Estimate produced that speaks to the policymaker with "one voice."

The end result of "groupthink" and the coordination process is intelligence products that reflect the lowest common denominator of views within an agency and, at the intelligence community level, the lowest common denominator between agencies.

In short, the result is mediocrity.

The coordination process explains why the intelligence community, though staffed with some of the most brilliant scholars and scientists in the nation, so often produces poor analysis, where sharp differences of opinion are softened or concealed, and the insights of genius watered down with the "common wisdom" of the average majority. The end product is usually bland, and often inferior to analysis produced by solitary, brilliant individuals working in academia or independent think tanks.

"Groupthink" and the coordination process give rise to another evil, a sin associated with all forms of collectivism: no sense of ownership or sense of responsibility for the product.

Collectivism does not produce a sense of common responsibility for intelligence products. It breeds, instead, a sense of anonymity and a sense of helplessness among individuals that

they can have an impact on whether the product is ultimately good or bad.

Countering “Groupthink”: The destructive effect of “groupthink” is probably the single greatest weakness of intelligence community analysis. “Groupthink” can be countered by changing the analytical culture to give more emphasis to diverse and alternative views, and especially to encourage the replacement of “groupthink” with intellectual individualism.

We must restore excellence to intelligence analysis. The surest way of achieving excellence is by letting individual analysts have their say, take responsibility by signing their reports, and encouraging competing schools of thought.

In the late-1970s, the CIA, to its credit, recruited a team of outside experts to examine data on Soviet military and strategic nuclear doctrine, to see if a plausible better interpretation of the data than that made by CIA could be produced. According to the “Team-B,” the Soviets were more focused on war-winning strategies than on deterrence. In effect, the “Team-B” found that the CIA was “mirror-imaging”—ascribing to the Soviet Union doctrines and strategies that closely resembled Western doctrines and strategies.

In the aftermath of the Cold War, we now know from examining Soviet and Warsaw Pact archives that the “Team-B” was right and the CIA was wrong. Soviet plans for waging nuclear war were not just for deterrence—and did not subscribe to Western theories about Mutual Assured Destruction (MAD)—but were designed for achieving victory.

Unfortunately, an embarrassed CIA never repeated the “Team-B” experiment and did not learn from it. Indeed, the CIA purged the unpopular Team-B Report. When I was an analyst at CIA, I inherited the last surviving copy of the original Team-B Report, which had been hidden away and protected from destruction by a retiring conservative "dissident" analyst, CIA's version of *samizdat*.

Team-Bs should be mandatory and become regular features of intelligence community analysis, at least on the most important national security issues.

National Intelligence Estimates, Intelligence Community Assessments, and other major intelligence products should cease and desist, focusing only on the corporate view. Alternative views, a range of possible interpretations of intelligence data, should be offered.

Finally, intelligence community honesty and integrity can be immediately and quickly improved by prohibiting the use of the phrase “**there is no evidence**” to imply the nonexistence of a threat, and that the intelligence community is omniscient. Instead, “there is no evidence” should be replaced with the phrase “**we do not know.**”

North Korea Case Study

Intelligence community leaders, managers, and analysts will vehemently disagree with my critique and recommendations to reform analytical culture.

They should carefully read an essay by Torrey Froscher, one of the intelligence community's best and brightest, “North Korea's

Nuclear Program: The Early Days, 1984-2002".[\[xvii\]](#) Froscher led the analysis of foreign nuclear testing and weapons proliferation issues during his 36-year career at CIA.

Froscher appears to agree with fellow intelligence officer Greg Treverton that politicization of intelligence is not much of a problem: "Greg Treverton has laid out a spectrum of politicization ranging from direct pressure from senior policy officials to a shared 'mindset' whereby intelligence and policy share strong predispositions. He points out that the first almost never happens, while the last is a 'limiting case' in that it may be self-imposed."[\[xviii\]](#)

But consider these other observations by Froscher that appear to admit, though it may not be his intention, that politicization is a serious problem in the intelligence community because of corporate views ("house lines"), the bias of individual analysts, and pressure from policymakers:

- "Polarization may occur in the I.C. when organizations develop strongly opposing 'house lines' that unduly color their interpretation of events. Individuals may also let strong personal views affect their analytic judgment."[\[xix\]](#)
- "When there is little or no concrete evidence to go on, there may be a temptation to offer a firm opinion anyway. It is sometimes difficult to say, 'I don't know' or suggest a range of possibilities when the policymaker wants an answer."[\[xx\]](#)
- "...analysts—as often as not—are strongly tempted to make their judgments as definite and certain as possible—'make the call,' as the expression goes. This is what customers want, after all. So there is an expectation that intelligence

analysts can and should provide the right answers, with little uncertainty."[\[xxi\]](#)

- "There were consistent warnings about the potential for nuclear weapons development [by North Korea], but the possibility of peaceful use was also taken seriously. In retrospect, this even-handed approach seems overly cautious...One important downside of the even-handed, cautious assessment of the North Korean nuclear problem in the 1980s is that it made it easier for policymakers to ignore the problem...Arguably, the I.C. could have and should have done more to sound alarms."[\[xxii\]](#)

Froscher's bottom-line recommendation for reforming the culture of intelligence community analysis is similar to my own:

"Is there a way to find a happy medium between 'making the call'—a firm judgment that goes beyond what can be known—and offering a banal 'on the one hand, on the other hand' formulation that sheds little light? Perhaps one fruitful approach would begin by spending less time reporting current developments and devoting more effort to thinking through possible future developments, how they might materialize, and what factors might affect their likelihood. Ideally, policymakers and academics would join with intelligence analysts to consider the historical context, uncertainties, and unknowns and layout alternative future pathways that events might follow. Such a program could provide a stimulus to new thinking as well as a breakdown of the polarization that harms working relationships, inhibits creative thought, and does not serve the interests of consumers."[\[xxiii\]](#)

Dr. Peter Vincent Pry is executive director of the Task Force on National and Homeland Security. He served on the Congressional EMP Commission as chief of staff, the Congressional Strategic Posture Commission, the House Armed Services Committee, and the CIA. He is author of "Blackout Wars," and also of "The Power and the Light," available on [Amazon.com](https://www.amazon.com).

Notes:

[i] Gregg Jarrett, *The Russia Hoax* (2018) and *Witch Hunt* (2019).

[ii] See, for example, Gregory Wrightstone, *Inconvenient Facts* (Silver Crown, 2017), and www.RealClimateScience.org.

[iii] "North Korea Says It Has Tested Hydrogen Bomb That Can Fit On ICBM" www.nbcnews.com (September 3, 2017). "North Korea Can Hit Most Of The United States: U.S. Officials" www.reuters.com (July 31, 2017). "New Missile Shows North Korea Capable Of Hitting All Of U.S. Mainland" www.cnn.com (November 30, 2017).

[iv] DNI Daniel Coats, *Worldwide Threat Assessment of the U.S. Intelligence Community* (ODNI: January 29, 2019). President Donald Trump, *Executive Order on Coordinating National Resilience to Electromagnetic Pulses* (White House: March 26, 2019).

[v] EMP Commission, *Assessing the Threat from EMP Attack* (July 2017). All unclassified EMP Commission reports are at www.firstempcommission.org.

[vi] R. James Woolsey, William Graham, Henry Cooper, Fritz Ermarth, Peter Vincent Pry, "Underestimating Nuclear Missile

Threats from North Korea and Iran” National Review (February 2016): Woolsey was former Director of Central Intelligence, Graham former White House Science Advisor to Ronald Reagan and ran NASA, Cooper former Director of the Strategic Defense Initiative, Ermarth former Chairman of the National Intelligence Council. See also Peter Vincent Pry, “Iran—The Worst Deal” Family Security Matters (March 28, 2016).

[vii] National Commission On Terrorist Attacks Upon The United States, *The 9/11 Commission Report* (July 22, 2004).

[viii] LaHood quoted in Fred Fleitz, “America Does Not Need A Director Of National Intelligence” Center for Security Policy (March 23, 2020).

[ix] *Commission on the Intelligence Capabilities of the United States Regarding Weapons of Mass Destruction: Report to the President* (March 31, 2005). Also quoted in Curt Weldon, *Countdown To Terror* (2005) p. 172.

[x] Ibid. Weldon in *Countdown To Terror* warned the ODNI would make intelligence performance worse, and what was needed was not organizational change but change in the analytical culture of the intelligence community.

[xi] Fleitz op. cit.

[xii] Ibid.

[xiii] Ibid.

[xiv] Ibid.

[xv] Ibid.

[\[xvi\]](#) Ibid.

[\[xvii\]](#) Torrey Froscher “North Korea’s Nuclear Program: The Early Days, 1984-2002” Studies in Intelligence (December 2016).

[\[xviii\]](#) Ibid, p. 28.

[\[xix\]](#) Ibid.

[\[xx\]](#) Ibid.

[\[xxi\]](#) Ibid.

[\[xxii\]](#) Ibid, p. 29.

[\[xxiii\]](#) Ibid.

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