

Foreign Funding of Indian NGOs

By Sanjeev Nayyar

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1. Introduction to FCRA

From time to time there is a furor over receipt of donations from abroad. In December 2013 the Supreme Court gave the Central Bureau of Investigation a further period of eight weeks to report on the actual of NGO's in the country.

Does the Government know the total amount of money received under the Foreign Contribution Regulation Act (FCRA)? How does GOI ensure that recipient organizations are working in national interest?

Using the 2010-11 FCRA report this article seeks to provoke thought by sharing data of donor countries, donors-their objectives, recipients etc.

First, a bit about the regulatory framework for NGOs who receive foreign funds?

FCRA regulates the receipt of funds by NGOs and is managed by the MHA. Any organization that wants to receive contributions from abroad has to apply and get approval from the Home Ministry. The associations could be religious, social, educational, cultural or educational organizations.

If an NGO, whether registered or not, receives a contribution in excess of Rs 1 cr during a period of 30 days, the Bank has to report this to the Central Government within 30 days of the date of such last transaction. The NGO has to annually submit audited accounts to MHA who scrutinize the returns to ensure that contributions received for a particular purpose are used for that purpose only. It does a detailed check of randomly picked associations and collates the data received to present the FCRA Annual Report.

2. Trends in Foreign Contributions

As on 31.3.2012, there were 41,844 registered associations under FCRA. As compared to 2004-05 (UPA came to power in 2004) the amount received in 2011-12 has gone up by 85% and their number 38%. See table.

Trends in Foreign Contributions

Financial Year	Registered Associations (as on 31 st March of F.Y.)	Associations that gave details of remittances received	Amounts received Rs crs
1993-94	15,039	Not Available	1865
2000-01	22,924	64%	4535
2003-04	28,351	61%	5105
2004-05	30,321	61%	6257
2005-06	32,144	58%	7878
2006-07	33,937	56%	11,007
2007-08	34,803	54%	9,663
2008-09	36,414	55%	10,803
2009-10	38,436	56%	10,338
2010-11	40,575	56%	10,334
2011-12	41844+	16756 not filed returns+	11548+
	Total 1993-94 to 2011-12		1,16,073

*All numbers in this article are reproduced from FCRA reports published by the MHA.

+ Reply to Rajya Sabha question no 199 dated 18/12/2013

Reported receipts by NGOs between 1993-94 to 2011-12 were Rs 1,16,073 crs. Only about 55% NGOs gave audited accounts so amounts received by them are included in this report. Actual receipts were much higher.

3. Largest Donors Country wise

Rs crs						
Year	USA	Germany	UK	Italy	Spain	Netherlands
2002-03	1680	715	685	316	250*	262
2003-04	1584	757	676	350	261	304
2004-05	1927	931	764	433	338	354
2005-06	2426	1181	1062	500	402	446
2006-07	2949	1033	1428	488	465	448
2007-08	2928	971	1269	515	401	414
2008-09	3433	1103	1131	547	437	513
2009-10	3106	1046	1039	584	437	509
2010-11	3261	1007	1065	490	351	469
Total	20,033	7,737	8,054	4223	3342	3719
2011-12	NA	NA	NA	NA	NA	NA

*Spain data for 2002-03 not accessible. Assumed at Rs 250 crs

NA means not published as on March 8, 2014

The top three donor countries consistently are USA, Germany, and UK.

Rs 20k crs by the U.S. and nearly Rs 8k crs by Germany/UK are large sums of money. Why are these countries remitting large sums of money? May be U.K. donates to help overcome the guilt of looting India during colonial rule or to continue with the colonial construct of the Indian Mind.

The economies of the U.S. and Europe, barring Germany perhaps, are under stress. Should not donors spend money on their own citizens!

Ironically receipts from Middle East countries were only app Rs 155 crs in 2010-11 even though media reports indicate funds come through hawala.

According to this report in Rediff.com there are atleast 40 charitable organizations in Saudi Arabia whose primary job is to raise money for funding terror in India. The links to Saudi Arabia became extremely clear when the police tracked a hawala transaction of \$10,000 (about Rs 4,60,000) which was used to carry out the July 11, 2006 serial train blasts in Mumbai that killed 209 people.” To read more <http://www.rediff.com/news/special/how-terror-funds-are-pumped-in-from-saudi/20110811.htm>

It is also possible that funds are routed through migrant working class who work in the Gulf.

Are such large contributions only for social work, a smokescreen for the Church to fund conversions to India/promote divisiveness tendencies in the country or create a population of believers with strong emotional bonding and dependence on the West? As a popular TV anchors says ‘The nation would like to know’.

Yogi Sikand, a high profile activist, who spent years fighting for the so called oppressed - Dalits, minorities and women wrote an article titled ‘*Why I gave up Social Activism*’. The piece gave insights into how NGOs use the lure of money; foreign conferences etc, to

accentuate if not create divisions in Indian society. To read more <http://www.countercurrents.org/sikand190412.htm>

4. Largest Donors: Agency wise trends 2010-11

Rs crs

<i>Name & Country</i>	<i>10-11</i>	<i>Name & Country</i>	<i>09-10</i>	<i>Name & Country</i>	<i>08-09</i>
1.Compassion International, USA	99	Gospel For Asia Inc USA	233	World Vision International USA	706
2.HCL Holdings Pvt Ltd, Mauritius	70	Fundacion Vicente Ferrer, Barcelona, Spain	229	Gospel For Asia Inc USA	596
3.Action Aid, UK	63	World Vision Global Centre, USA	198	Fundacion Vicente Ferrer, Barcelona, Spain	458
4.Population Service International, USA	61	Compassion International, USA	132	Shyam Shyam Dham Samiti India	359
5.Bill & Melnda Gates Foundation, USA	49	HCL Holdings Pvt Ltd, Mauritius	94	Compassion International, USA	347
6.Kinder Not Hilfe e. V (KNH) Germany	48	Om Foundaiton, USA	64	Fundacion Vicente Ferrer, Spain	241
7.EED-Evangeischer Entwickkugddienst e.v., Germany	40	Population Service International, USA	51	Action Aid International, UK	228
8.SOS Kinderdorf International, Austria	36	Oxfam GB, UK	45	BAPS, Inc USA	199
9.Wort and Tat Allgemeinel Mission, Geselischaft, Germany	32	Save The Children, UK	44	Christian Children Fund, USA	197
10.Save the Children UK	29	EED-Evangeischer Entwickkugddienst e.v., Germany	44	Plan International, USA	191
11.Leprosy Mission, International, UK	29	University of Manitoba, Canada	41	Om Foundation, USA	188
12.General Conference of 7 th Day Adventists, USA	26	Bill & Melnda Gates Foundation, USA	40	Ahmadiyya Muslim Association, UK	178
13.International Development (Enterprises (IDE), USA	26	Plan International, USA	39	Mata Amritanandmai Centre, USA	176
14.Christian Foundation for Children and Aging, USA	24	SOS Kinderdorf International, Austria	34	The Global Fund to Fight aids, Tuberculosis, Malaria Switzerland	166
15.Oxfam GB, UK	23	Wort and Tat Allgemeinel Mission, Geselischaft, Germany	29	Oxfam India Trust, UK	163
Received Top 15	655	Received Top 15	1317	Received Top 15	4393
Total Receipts	10334	Total Receipts	10338	Total Receipts	10803

Whilst the total contribution have remained at app Rs 10,350 crs, % of top 15 donors has fallen from a high of 41% of total receipts in 2008-09 to 6% in 2011-12.

This could mean that big donors have stopped giving or are doing so through different donor entities. Since total contributions from the big three i.e. U.S., Germany and U.K. are around the same levels it must be the latter.

For e.g. as a top 15 donor World Vision International USA remitted Rs 706 crs in 2008-09 but did not make it to the top donors list in 2010-11. Corresponding receipts for World Vision India Tamil Nadu were Rs 192 crs and Rs 234 crs respectively.

Another e.g. is Gospel for Asia a Texas based Christian missionary organization. In 2009-10 it made contribution of Rs 233 crs but does not feature in top 15 donors list in 2010-11. Perhaps, wanted to get off the MHA radar after the furor created by the “2008 Kerala Home minister statement that the ‘Church has bought nearly 2,800 acres of land, including a 2200 acre rubber estate” excerpts from Breaking India by R Malhotra and Aravindan Neelakandan.

As per site of World Vision, largest donor in 2008-09 Rs 706 crs, their Mission is “World Vision is an international partnership of Christians whose mission is to follow our Lord and Saviour Jesus Christ in working with the poor and oppressed to promote human transformation, seek justice and bear witness to the good news of the Kingdom of God.” To read more <http://www.wvi.org/vision-and-values-0>

5. About Donors

Name of Donor	2010-11	About Donor (as on 8 th March 2014)
1.Compassion International, USA	99	www.compassion.com Releasing children from poverty in Jesus name.
2.HCL Holdings Pvt Ltd, Mauritius	70	No site. Donated to Shivanadar Foundation.
3.Action Aid, UK	63	www.actionaid.org.uk . To work with poor and excluded people to eradicate poverty and injustice.
4.Population Service International, USA	61	www.psi.org . A leading global health org with programs targeting malaria, child survival, HIV, reproductive health and non-communicable disease.
5.Bill & Melnda Gates Foundation, USA	49	www.gatesfoundation.org . Works to help all people lead healthy, productive lives. Health, nutrition, agriculture, HIV development, sanitation included.
6.Kinder Not Hilfe e. V (KNH) Germany (88,000 reliable donors who contribute fixed amt on a regular basis).	48	http://en.kindernothilfe.org/ . Implement rights & Poverty removal of children. Our engagement is based upon Christian values.
7.EED-Evangelischer Entwickkugddienst e.v., Germany	40	Not Available
8.SOS Kinderdorf International, Austria	36	www.sos-childrensvillages.org We take action for children as an independent non-governmental social development organization
9.Wort and Tat Allgemeinel Mission, Gesellschaft, Germany	32	www.wortundtat.org/wortundtat/en/ . We bring the message of God’s love and his offer of reconciliation through Jesus Christ to the people with no hope. Support to poor in social and medical sectors. (focus Andhra P).
10.Save the Children UK	29	www.savethechildren.org.uk . We run programmes to save children’s lives to give them a brighter future.
11.Leprosy Mission, International, UK	29	www.leprosymission.org . LMI is an international Christian organisation which helps people affected by leprosy.
12.General Conference of 7 th Day Adventists, USA	26	www.adventist.org/world-church/general-conference The General Conference is responsible for the spiritual and developmental plans of the church around the world
13.International Development (Enterprises (IDE), USA	26	www.ideorg.org . Since 1991 it has ensured the adoption of more than 750,000 treadle pumps by Indian smallholders farm families.
14.Christian Foundation for Children and Aging, USA	24	www.unbound.org . Is to walk with the poor and marginalized of the world. We are grounded in the Gospel call to serve the poor.
15. Oxfam GB, UK	23	www.oxfam.org.uk . Root causes of poverty from life’s basics e.g. food, education to complex issues like human rights. For Oxfam Mother matching contribution by UK Govt.

A review of the objects of the top 15 donors indicate their work is to do with children, education, HIV/AIDS, health, human rights.

Had the Government of India invited these organizations to supplement its efforts?

Would foreign governments allow Indian NGO's to do in their country what their NGO's do in India? "Incidentally, there is an act in the USA called Foreign Agents Registration Act [FARA] and it provides for penalties up to ten years in jail for acting as a foreign agent or getting foreign funds without notification to the Attorney General. FARA was originally passed in 1938 to prevent the spread of Nazi ideas and propaganda".

How does MHA ensure that in the name of child education and human rights divisive tendencies and conversions amongst the local people are not undertaken?

For eg World Vision International USA donated Rs 706 crs in 2008-09. "World Vision is one of the organizations blamed by natives as the chief investigator for the gunning down, in 2008, of a Hindu monk for their work in counteracting Christian proselytizing. Maoists claimed responsibility for the killing. The Evangelist-Maoist connection triggered Hindu-Christian violence'. Former Bihar Home Secretary, Afzal Amanullah, stated 'Intelligence agencies report Maoists getting money from foreign-funded NGOs. Now, we have to do a lot of planning to stop this worrisome syndrome from spreading". Breaking India by Rajiv Malhotra and Aravindan Neelakandan.

It is an acknowledged fact that conversions disturb the cultural and social fabric in society. The author experienced that first hand during a recent trip to Arunachal Pradesh.

There are, however, organizations that receive foreign funds and doing excellent work.

The Nation must question the need for such organizations!

6. Top 15 Recipient Associations Trends 2010-11

Rs crs

Association	10-11	Association	09-10	08-09
1.World Vision of India, Tamil Nadu	234	World Vision of India, Tamil Nadu	209	192
2.Believers Church India, Kerala	161	Rural Development Trust, A.P.	151	155
3.Rural Development Trust, A.P.	135	Shri Sevassubramania Nadar Educational Charitable Trust, Tamil Nadu	94	*
4.Caruna Bal Vikas, Tamil Nadu	96	Believers Church India, Kerala	88	100
5.Women's Development Trust, Andhra Pradesh	73	Caruna Bal Vikas, Tamil Nadu	83	74
6.Oxfam Trust, Delhi	71	Women's Development Trust, Andhra Pradesh	80	81
7.Shivnagar Foundation, Delhi	70	Sri Sri Jagadguru Shankaracharya, Karnataka	71	60
8.Bal Raksha Bharat, Delhi	68	Action Aid, Karnataka	66	77
9.Action Aid, Karnataka	67	Bal Raksha Bharat, Delhi	66	
10.Missionaries of Charity, West Bengal	63	SOS Children's Village of India, Delhi	62	83
11.Mata Amritanandmayi Math, Kerala	61	Love India Ministries, Kerala	62	*
12.Christian Children Fund, Inc, Karnataka	61	Oxfam Trust, Delhi	59	*
13.Population Services International, Delhi	60	Plan International Inc, Delhi	55	66
14.Compassion East India, West Bengal	60	Tibetan Children's village, Himachal Pradesh	53	*
15.SOS Children's Village of India, Delhi	55	Missionaries of Charity, West Bengal	53	*
Top 15 recipients received	1335	Top 15 recipients received	1252	
Total Contribution received	10334	Total Contribution received	10338	10803

*Not in top 15 recipients in 2008-09 hence not shown.

Of the top 15 recipients in 2010-11 only two can be said to be run by the majority community. Can the MHA ensure 41,000 odd NGOs use funds received only for declared purposes?

At the height of the Kundankulam agitation senior journalist Venky Vembhu wrote, "The NGOs that are at the centre of the latest action haven't been named, but [they are believed to be those associated with Bishop Yvon Ambroise](#), the Tuticorin church leader, who has been active in mobilising popular support for the protests at Kudankulam. Two of the NGOs associated with Ambroise – the Tuticorin Diocese Association (TDA) and the Tuticorin Multipurpose Social Service Society (TMSSS) – have been working in the area of fishermen's livelihood, and their support for the anti-nuclear agitation draws on the fears to the fisherfolks' livelihood from the nuclear power plant'. To read more <http://www.firstpost.com/politics/church-role-in-kudankulam-protests-merits-wider-probe-228719.html>

Ford Foundation has been in the news lately because of grants to some high profile individuals. Since the Foundation is a grant making organization and not a recipient of funds its site has consolidated audited financial statements only. The goal of Ford Foundation India is 'The goal of our work is to address persistent poverty by empowering socially marginalized groups and improving government policies'.

Do the goals of many NGO's not reflect an air of superiority amongst the Western world as if they are solely responsible for human rights, health and poverty alleviation etc worldwide.

Social service organizations are not the only recipients of foreign donations. Large number of Think-Tanks benefit from such generosity too. To read more <http://www.openthemagazine.com/article/business/foreign-funding-of-ngos>

7. About NGO's who received Foreign Funding

Association	2010-11	About Association (as on 8 th March 2014)
1.World Vision of India, Tamil Nadu	234	www.worldvision.in . Christian humanitarian organisation working to create lasting change in the lives of children, families and communities living in poverty and injustice. Annual Report 2013 on site does not contain audited accounts.
2.Believers Church India, Kerala	161	www.believerschurch.com . Our mission in life is to glorify God by seeking to know Jesus more fully and intimately, to worship Him as He desires. Runs schools and social service. No Financial Information on site.
3.Rural Development Trust, A.P.	135	http://rdtfvf.org/ . To reach out to the poor and oppressed communities, fight violence against women, help disabled, health etc. Audit report 2012-13 on site.
4.Caruna Bal Vikas, Tamil Nadu	96	http://carunaalumni.org/about.php . Associate of Compassion Internal U.S.A. Educating, training and discipling servant leaders. Influence the development of nations by preparing young people from impoverished backgrounds to be Christian leaders etc. No audited accounts on site.
5.Women's Development Trust, Andhra Pradesh	73	wdtfvf.org . Similar to Rural Development Trust above. Audited accounts 2012-13 on site.
6.Oxfam Trust, Delhi	71	www.oxfamindia.org . Empowering poor and marginalized to ask for their rights etc. One of core value is inclusiveness, pluralism, secularism. Audited accounts for 2012-213 on site.
7.Shivnadar Foundation, Delhi	70	www.shivnadarfoundation.org . Leadership for Change. Through Transformational Education. Audited Accounts 2012-13 on site.
8.Bal Raksha Bharat, Delhi	68	www.savethechildren.in . Progress of children. Audited Accounts 2011-12 on site.
9.Action Aid, Karnataka	67	www.actionaid.org . Rights of Urban Poor Karnataka. People in focus: Dalits, minorities and most backward groups (MBC). Audit Report on site is for Action Aid India Branch and not recipient for y.e.31/12/12
10.Missionaries of Charity, West Bengal	63	Could not find site. http://www.motherteresa.org/07_family/Volunteering/v_cal.html .
11.Mata Amritanandmayi Math, Kerala	61	www.amritapuri.org . Cultural & Spiritual, Education, zHealthcare, Disaster relief etc activities. Audited accounts not on site.
12.Christian Children Fund, Inc, Karnataka. Parent U.S. NGO.	61	www.childfund.org . Child Fund is new name. To help children living in poverty. To promote societies that advance rights of children. Audited accounts not on site.
13.Population Services International, Delhi	60	www.psi.org/india . HIV, AIDS, Child survival, Reproductive health, Malaria prevention. Audited accounts not on site.
14.Compassion East India, West Bengal	60	http://childrenreleased.com/about.html . Caters to the needs of children and impacting families and communities across the length and breadth of Eastern region, the tribal hub of India. No audited accounts on site.
15.SOS Children's Village of India, Delhi	55	http://www.soschildrensvillages.in/Pages/default.aspx We work for children who are orphaned, abandoned or whose families are unable to care for them. Child care, Children's Rights, Education, Emergency Response. Audited accounts for 2012-13 on site.

Top 15 recipients received	1335	
Total Contributions received	10334	

A number of recipient organizations have not uploaded audited accounts on the site. *Should NGO's be covered by the Right to Information Act even though they use foreign money?*

A number of associations who receive money refer to address persistent poverty by empowering socially marginalized groups, removal of injustice, fight violence against women etc. These issues are typically pursued by Western Governments. For e.g. have you read reports of religious freedom and women's rights on their own countries.

Action Aid India's Annual Report 2012-13 refers to National Study on the status of Muslims in India. Does this not tantamount to interfering in India's domestic affairs? How would UK respond if a RSS Think Tank did a study on the condition of Muslims in UK?

In a deeper sense there is a fundamental flaw with organizations who over-emphasize the western concept of human rights. It makes Indians look at the world through a western prism instead of an Indic one.

Maharishi Aurobindo said, "Dharma is the Indian conception in which rights and duties lose the artificial antagonism created by a view of the world, which makes selfishness the root of action, and regain their deep and eternal unity. Dharma is the basis of democracy which Asia must recognize, for in this lies the distinction between the soul of Asia and the soul of Europe".

8. Trends of State wise receipt of Foreign Contributions

Rs crs

State	NGO not+ filed returns	11-12+	10-11	2005-6	2002-3
1. Tamil Nadu	1827	1704	1557	1609	775
2. Delhi	646	2286	2017	1556	881
3. Andhra Pradesh	2373	1258	1177	1012	630
4. Maharashtra	1734	1107	914	664	505
5. Karnataka	1195	1101	999	621	489
6. Kerala	755	1029	873	656	409
7. Jharkand	248	144	135	97	58
8. West Bengal	1227	727	652	355	272
9. Gujarat	654	384	363	301	272
10. UP	182	265	257	103	NA
11. Orissa	1001	239	211	129	NA
12. MP	324	155	145	77	NA
13. Bihar	1026	179	144	101	NA
14. Rajasthan	283	145	141	-	NA
15. Himachal P	78	125	129	83	NA
16. Others	3203	700	620	514	756
Total	16,756	11548	10,334	7,878	5,047

+ Columns 1 & 2 is Reply to Rajya Sabha question no 199 dated 18/12/2013

Column one gives the number of NGOs who have not submitted their returns to MHA. Tamil N, Andhra P, Maharashtra, Karnataka, West B, Orissa and Bihar share the honors.

One of the effects of the Tsunami that hit Tamil Nadu in 2004 was the surge in foreign contributions to the State from Rs 775 crs in 2002-03 to an all time high of Rs 2,118 crs in 2006-07.

Four southern states account for 44% of reported receipts. These states received Rs 1,603 crs in 2002-03, up 217% in 2012-12. It is well known that the Church is increasingly active in these states – would be interesting to compare the Christian population in these states then and now. Note that even a small state like Uttaranchal received Rs 120 crs during 2011-12.

Can MHA monitor the working of NGO's in so many states? Are the State Governments involved and to what extent?

9. Top Recipient Districts of Foreign Contributions

District	Rs crs			
	2010-11	2009-10	2007-8	2002-3
Chennai	773	872	731	363
Mumbai	644	607	470	284
Bengaluru	774	702	670	358
Kolkatta	387	341	352	NA
Hyderabad/Sec	325	334	291	181
Ananthpur	275	414	278	169
Quilon	369	324	250	-
Ahmedabad	189	219	207	NA
Madurai	157	177	187	NA
Ernakulam	205	226	207	NA
Pune	129	186	173	NA
Krishna	151	158	134	NA
Tiruchirapali		-	96	NA
Kancheepuram	121	112	122	NA
KangraDharamsala	127	145	104	NA
Kottayam	100	106	NA	NA

NA stands for not available.

Among the districts, the largest recipients of contributions were Bengaluru Rs 774 crs Chennai Rs 773 crs, Mumbai Rs 644 crs, Kolkatta Rs 341 crs, Ananthapur Rs 275 crs, Hyderabad/Secunderbad Rs 325 crs, Quilon Rs 369 crs.

These are huge sums of money that require continuous and serious monitoring to ensure that end utilization matches the purported purposes for which the monies were received.

10. Utilization of Foreign Contributions

Expenditure Head	Rs crs	
	2010-11	2009-10
1. Establishment expenses	1337	1483
2. Rural Development	863	944
3. Relief/rehabilitation of natural calamities		267
4. Welfare activities for children	745	743
5. Construction/maintenance of schools/colleges	681	631
6. Grant of stipend/scholarship to poor children	458	455
7. AIDS related	392	330

8. Welfare of Orphans	260	298
9. Maintenance and education of priests, religious schools	446	330
10. Construction/Repair of Places of Worship	168	206

In 2010-11 Rs 681 crs was spent for construction of maintenance of schools and colleges. Since most of the recipients are Christian organizations it would be correct to assume that a major portion of amount was received by them.

Most would be aware that the Christian community plays a dominating role in the field of school education. Whilst giving them due credit one of the reasons is because the Indian Christian community inherited Jesuit schools started by the British, the author went to one such school.

Article 29 and 30 of the Constitution conferred rights to minorities to establish and administer educational institutions to promote its religious tenets, philosophy etc. *However, when donations received from abroad allow the community to set up more schools where the students are predominantly Hindu, then it only accentuates the control that the community has over education.*

A very good example is the Ryan International Group who runs 128 schools across 18 states. When its founder, Dr A F Pinto was conferred The Excellence Award for 2012 by The Christian Chamber of Commerce and Industry a blog in the Times of India said “How much of the “success” of such minority-institutions (in particular, Catholic-faith based schools and educational groups) is due to the relative “freedom” they enjoy from government interference and controls (e.g. minority-institutions are exempt from the recent RTE legislation), as well as the generous funding they receive from abroad?”. To read more <http://blogs.timesofindia.indiatimes.com/reclaiming-india/entry/of-islamic-vc-funds-and-christian-chambers-of-commerce>

Not sure if the framers of the Constitution had envisaged this situation when special rights were given to minorities to administer and establish their own institutions.

The author is not suggesting that India becomes inward-looking again but every nation has a right to safeguard its national interests, culture and social fabric.

The new Government needs to take a closer look at the need for foreign funding, NGO goals/working and synergise them with national interest.

The author is a Chartered Accountant and founder www.esamskriti.com

Note – Data taken from the FCRA report published by the MHA and relevant web sites. Any errors are unintended and regretted.