

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 04-814 (RCL)
)	
CENTRAL INTELLIGENCE AGENCY,)	
)	
Defendant.)	
_____)	

PLAINTIFFS' REQUESTS FOR ADMISSIONS TO DEFENDANT

To: Central Intelligence Agency
c/o Daman Taaffe, Esq.
Assistant United States Attorney
555 Fourth Street, NW
Washington, DC 20530

COME NOW plaintiffs Roger Hall, Studies Solutions Results, Inc., and Accuracy in Media, Inc., by counsel, under Rule 36 of the Federal Rules of Civil Procedure, and propound the following Request for Admissions to defendant. Plaintiffs ask defendant to admit or deny the following, under oath, within 30 days after receipt.

REQUESTS TO ADMIT

Request 1: The government represented to the Court at the September 26, 2017 Status Hearing (ECF 293 p. 3-4) that it would disclose Exemption 6 materials ordered released, unless the FBI/DOJ filed a timely appeal.

Response:

Request 2: The CIA did not appeal the Court's order that Exemption 6 material be disclosed.

Response:

Exhibit B

Request 3: The CIA did not disclose the records referenced above in Request 1.

Response:

Request 4: The Court "direct[ed] the CIA to provide further specificity as to the regulations and schedules applied to its decision to destroy the files." (Mem Op., ECF 291 at 14).

Response:

Request 5: The CIA did not provide any further specificity regarding the regulations and schedules applied to its decision to destroy the records.

Response:

Request 6: The government advised the Court at the September 26, 2017 Status Hearing (ECF 293 p. 4) that it would file a motion for the Court's *in camera* review of the destruction schedules that authorized the destruction of 114 documents.

Response:

Request 7: The CIA did not file a motion seeking the Court's *in camera* review of the destruction schedules.

Response:

Request 8: Defendant failed to search and review the up to 60-year-old records at issue of 1,400 live sighting reports.

Response:

Request 9: Defendant failed to search and review the up to 60-year-old records at issue of suspected prison camps.

Response:

Request 10: Defendant failed to search and review the up to 60-year-old records at issue of at issue named reconnaissance and rescue operations.

Response:

Request 11: Defendant failed to search and review the up to 60-year-old records at issue provided to Congress.

Response:

Request 12: Defendant disclosed the latest date it discerned for packets of records provided Congress, withheld-in-full under Exemptions (1) and (5).

Response:

Request 13: The CIA has a legal duty to disclose the earliest date of the records, or the earliest date of the information, in records referenced in the forgoing Request.

Response:

Request 14: Approximately six hundred POWs were held in Laos and Vietnam after the conclusion of the Vietnam War.

Request 15: Executive Branch policy is to withhold intelligence regarding many of these men.

DATE: January 31, 2018.

_____/s/_____

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_____/s/_____

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