

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ROBERT MOORE, <i>et al.</i> ,)	
)	
Plaintiffs.)	
)	
v.)	Case No. 20-1027 (RCL)
)	
CENTRAL INTELLIGENCE AGENCY,)	
)	
Defendant.)	
_____)	

AFFIDAVIT OF JOHN H. CLARKE

John H. Clarke, counsel for plaintiffs, hereby states as follow:

1. Mr. Valdez represents that the October 15, 2021 *CIA Status Report*, states "that Plaintiffs were only challenging the redactions and withholdings." This statement is false. *See* ECF No. 20 ¶ 8.

2. Mr. Valdez represents that, last October, the undersigned told him that plaintiffs "were only challenging the redactions and withholdings." *Valdez Decl.* ECF No. 32-2 ¶ 7. This statement is false.

Date: April 12, 2022.

I hereby certify under penalty of perjury that the foregoing is true and correct.

/s/ John H. Clarke
John H. Clarke