

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 PRODUCTION OF DOCUMENTS

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 34 of the Federal Rules of Civil Procedure, and request that defendant CIA produce documents, within 30 days of receipt of these requests.

Definitions

1. The term "operational records" is defined in 50 U.S. Code § 3141 – *Operational files of the Central Intelligence Agency*, or CIA Act.

\_\_\_\_\_

Request 1: Please provide copies of the policies, directives, regulations, and control schedules that govern the management, retention, temporary designations, and destruction, of the 114 files that the CIA destroyed.

Request 2: Please provide copies of the policies, directives, and regulations that provide the criteria and factors to be considered in CIA Decennial reviews regarding whether or not to continue the designation of a record "operational."

**Exhibit C**

DATE: January 31, 2018.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
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