

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, et al.,

*Plaintiffs,*

v.

CENTRAL INTELLIGENCE AGENCY,

*Defendant.*

Civil Action No. 04-0814 (RCL)

**DEFENDANT’S RESPONSE TO PLAINTIFF’S STATEMENT OF MATERIAL FACTS  
NOT IN GENUINE DISPUTE**

Pursuant to Fed. R. Civ. P. 56(c)(1) and Local Civil Rule 7(h), Defendant United States Central Intelligence Agency (“Agency”) submits this response to Plaintiffs’ Statement of Material Facts Not in Genuine Dispute, ECF No. 378-1, (“Pl. Statement of Facts”), in this Freedom of Information Act (“FOIA”) action.

1. CIA did not name any component, or office, searched. Blaine Decl. ECF No. 376-3.

**Response.** The Agency is not required to name the components or offices searched. Given the Agency’s national security mandate, specific information about Agency databases and exactly how these repositories are structured and searched cannot be described in great detail on the public record. See declaration of Vanna Blaine, ECF No. 376-3 and her supplemental Declaration, ¶ III. 1; 50 U.S.C. § 431(a).

2. CIA did not identify any records system searched. *Id.*

**Response.** Agency information management professionals searched Agency records in operational file systems. All databases likely to contain responsive materials were searched and

there are no other record systems reasonably likely to contain responsive records. Further, the Agency is not required to name the records systems searched. Given the Agency's national security mandate, specific information about Agency databases and exactly how these repositories are structured and searched cannot be described in great detail on the public record. See declaration of Vanna Blaine, ECF No. 376-3 and her supplemental Declaration, ¶ III. 1; 50 U.S.C. § 431(a).

3. CIA did not identify whether its searches were of hard copies, or electronic searches, or both. *Id.*

**Response.** The Agency indicated it conducted an “electronic and hard copy search of Agency records” in its initial Declaration (ECF NO. 376-3 ¶ 12) and further noted that “aged operational files, originally maintained in hard copy form, were digitized and made a part of [the databases searched]” in its Supplemental Declaration, ¶ III. 1.

4. CIA did not identify whether its searches utilized indices, or sub-indices.

**Response.** The Agency is not required to identify indices or sub-indices searched. Given the Agency's national security mandate, specific information about Agency databases and exactly how these repositories are structured and searched cannot be described in great detail on the public record. See declaration of Vanna Blaine, ECF No. 376-3 and her supplemental Declaration ¶ III. 1; 50 U.S.C. § 431(a).

5. CIA did not identify how many hours were devoted to its search.

**Response.** The Agency is not required to disclose the time committed to a search. Agency information management professionals conducted a thorough search for Agency records in operational file systems. All databases likely to contain responsive materials were searched and

there are no other record systems reasonably likely to contain responsive records. See Declaration of Vanna Blaine, ECF No. 376-3 and her supplemental Declaration.

Dated: May 11, 2022

Respectfully submitted,

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