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MARK A. ALLEN

Plaintiff

v.

CENTRAL INTELLIGENCE AGENCY, et. al.
STANSFIELD TURNER

Defendants

Civil Action No. 78-1743

PLAINTIFF'S INTERROGATORIES

1. Does CIA item #509-803 specifically mention any Cenral Intelligence Agency source or method?
2. If the answer to question number one is yes, are any of these sources or methods not mentioned in any Warren Commission or C.I.A. documents?
3. Does Mr. Robert Owen, the C.I.A.'s classification expert, know the exact sources or methods that will allegedly be jeopardized by the release of CIA item ~~2~~509-803?
4. If so, how did he obtain such knowledge?
5. The following C.I.A. and Warren Commission documents contain information concerning the contents of C.I.A. item 509-803. Please specify which, if any, of the below listed documents did Mr. Robert Owen review prior to his determination that CIA item #509-803 was classified SECRET pursuant to Exective Order 12065.
 - a) The February 14, 1964 Warren Commission internal memorandum from William Coleman, Jr. and W. David Slawson to J. Lee Rankin, subject: Mexican Trip.
 - b) Entry 45, Record Group 272, National Archives, Oswald-Ruby Chronology, pages 685-713
 - c) The publicly available portions of the February 17, 1964 Warren Commission internal memorandum from Sammuel Stern to J. Lee Rankin, subject: Report on Security Measures to Protect the President, pages 24 (completely available) and 33-34 (partially deleted)
 - d) The February 12, 1964 letter from Warren Commission General Counsel J. Lee Rankin to John McCone, Director of the Central Intelligence Agency
 - e) The April 21, 1964 letter from J. Lee Rankin to Richard Helms, C.I.A. Deputy Director of Plans
 - f) CIA item #633-797, 498-204
 - g) Warren Commission Document #1000, 631, 674, 1084d, 776a
 - h) Warren Commission Exhibits 2120, 2121, 2123, 2564

- i) Warren Commission Report, pages 299-310, 730-736
 - j) Appendix to Hearings Before the Select Committee on Assassinations of the U.S. House of Representatives, Volume 11, pages 485, 487
 - k) CIA items 5-1A, 2, 4, 7, 9-5, 10, 12, 14, 19, 47-544, 555-809, 619-792, 948-927T, 1272-1028 (CIA FOIA numbers)
 - l) The April 1, 1964 Warren Commission Draft memorandum from William T. Coleman and W. David Slawson to J. Lee Rankin concerning Oswald's Mexican trip
6. Taking into account all of the material listed in question number five, plus any other knowledge defendants may have, what percentage of the substantive information found in CIA item #509-803 is already available in publicly released U.S. government documents?
 7. Please specify by page numbers the pages which defendants contend are properly withheld under exemption (b)(1).
 8. Please specify by page numbers the pages which defendants contend are properly withheld under exemption (b)(2).
 9. Please specify by page numbers the pages which defendants contend are properly withheld under exemption (b)(3).
 10. Please explain in as much detail as possible why the publicly available information in CIA item #509-803 cannot be reasonably segregated from the material defendants allege is exempt.
 11. CIA item #498-204, a C.I.A. cable dated January 29, 1964, refers to a report on "Lee Oswald's activities in Mexico" which was to be presented to the Warren Commission on February 1, 1964. Is the C.I.A. report to the Warren Commission referred to above identical with C.I.A. item #509-803 ?
 12. Please identify the sender and the recipient of the cable referred to in question #11.
 13. All of the Warren Commission items listed in question #5 are available from Mr. Marion Johnson, custodian of the Warren Commission records at the National Archives. With this fact in mind, do defendants require that plaintiff furnish them any of the items listed in question #5? If so, plaintiff will furnish them promptly.

Respectfully submitted,

Mark A Allen

Mark A. Allen
Pro Se
2689-1 Barracks Road
Charlottesville, Va. 22901
(804)295-5489

Dated: November 19, 1979
Charlottesville, Va.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have served a copy of the foregoing interrogatories on the defendants by mailing a copy to their attorney, Lawrence T. Bennett, postage prepaid, at the U.S. District Courthouse, Room 3438-B, 3d and Constitution Ave., N.W., Washington, D.C. 20001, on this 19th day of November, 1979.

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REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, plaintiff requests that within thirty days the defendants produce and permit plaintiff to make copies of the following documents:

1. If C.I.A. item #509-803 contains a coversheet, then a copy of every coversheet from every copy of document #509-803 in the possession of the defendants.
2. If C.I.A. item #509-803 does not contain a coversheet, then a copy of the first page of C.I.A. item #509-803 from every copy of this document in the possession of the defendants, minus any material exempt under the Freedom of Information Act. The undeleted material should include any stamps, markings, notations or other written material concerning the classification of this document pursuant to an Executive Order.
3. Any correspondence, memoranda or other records concerning any communications between the defendants and officials at the National Archives as to whether C.I.A. item 509-803 should be declassified.

Dated: November 29, 1979
Charlottesville, Va.

Respectfully submitted,

Mark A. Allen

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