

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARK ALLEN,

Plaintiff,

v.

CENTRAL INTELLIGENCE AGENCY,

Defendant.

Civil Action No. 78-1743

AFFIDAVIT

LOUIS J. DUBE, being first duly sworn, deposes and says:

1. I am the Information Review Officer of the Directorate of Operations (DO) of the Central Intelligence Agency (CIA). My responsibilities include the review of DC documents which are the object of the Freedom of Information Act (FOIA) requests to CIA to ensure that FOIA determinations made regarding the disposition of such documents are proper. The statements made herein are based upon my knowledge, upon information made available to me in my official capacity, upon advice and counsel from the Office of General Counsel and upon conclusions reached in accordance therewith. (U)

2. By classified affidavit of my predecessor, Gerald L. Liebenau, executed on 9 February 1981, the CIA advised the Court of the detailed reasons for CIA's continued withholding of portions of Document No. 509-803, the subject of this particular litigation. The Agency has consistently stated with regard to Document No. 509-803 that "most of the substantive information in the document is contained in other documents that have been released to the public." See, Liebenau Affidavit, ¶19. The Agency has further asserted that the information in Document No. 509-803 is so intermixed with

operational details which could lead to the disclosure of intelligence sources and methods that it is impossible to remove those operational details while leaving a coherent remainder. Thus to avoid the possibility of unauthorized disclosures, much of the substance of the document has had to be withheld. A sampling of previously released documents containing the same information was provided with the Liebenau Affidavit for the Court's convenience and for purposes of comparison. In Discovery, plaintiff has now requested copies of the documents provided the Court with the Liebenau Affidavit. (U)

3. |



4.)

(S)

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For this reason, I believe the Government must
continue to withhold any further information which would disclose
the unacknowledged subjects of Document No. 509-803. (S)



Louis J. Dube
LOUIS J. DUBE

COMMONWEALTH OF VIRGINIA)
) ss.
COUNTY OF FAIRFAX)

Subscribed and sworn to before me this 5 day of
June 1981.

Linda C. Ward
Notary Public
My term of office expires on the 27th day of November, 1984.
I was Commissioned A Notary Public as Linda E. Colgan.

My commission expires :