

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

PAUL HOCH,)
)
 Plaintiff,)
)
 v.) Civil Action No. 82-0754
)
 CENTRAL INTELLIGENCE AGENCY,)
)
 Defendant.)

ANSWER

Defendant Central Intelligence Agency, by its undersigned attorneys, hereby answers the Complaint as follows:

FIRST DEFENSE

The Complaint fails to state a claim upon which relief can be granted.

SECOND DEFENSE

The Court lacks jurisdiction over the subject matter of this action in that no record has been improperly withheld within the meaning of 5 U.S.C. §552.

THIRD DEFENSE

In response to the numbered paragraphs of the Complaint, defendant hereby admits, denies, or otherwise avers as follows:

1. Paragraph 1 of the Complaint is a characterization of the action which does not require an answer, but insofar as an answer may be deemed appropriate it is denied.
2. Denies the allegations of paragraph 2 of the Complaint as conclusions of law.
3. Denies the allegation of paragraph 3 of the Complaint for lack of information or knowledge sufficient to form a belief as to the truth of the allegation.
4. Denies the allegations of paragraph 4 of the Complaint, except avers that defendant is an agency of the United States and has possession of certain records to which plaintiff seeks access.
- 5-8. Denies the allegations of paragraphs 5 through 8 of the Complaint, except avers transmittal and receipt, respectively, of the correspondence attached to the Complaint, to which the Court is respectfully referred for a complete and accurate statement of the contents thereof.

9. This is a paragraph which does not require an answer, but insofar as an answer may be deemed appropriate it is denied.

10. Denies the allegation of paragraph 10 of the Complaint, except avers transmittal and receipt, respectively, of the correspondence attached to the complaint, to which the Court is respectfully referred for a complete and accurate statement of the contents thereof.

11-13. Denies the allegations of paragraphs 11 through 13 of the Complaint, as conclusions of law.

Each and every allegation not heretofore expressly admitted or denied is denied.


Defendant denies that plaintiff is entitled to the relief prayed for or to any relief whatsoever.

WHEREFORE, defendant, having fully answered, demands judgement dismissing the Complaint herein, together with the costs and disbursements of this action.

Respectfully submitted,

STANLEY S. HARRIS
United States Attorney

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Assistant United States Attorney



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing answer was served upon plaintiff by deposit of a copy thereof in the United States mail, postage prepaid, first class mail, addressed to:

Bernard Fensterwald, Jr., Esq.
1000 Wilson Boulevard
Suite 900
Arlington, Virginia 22209

on this 22nd day of April, 1982.

Geoffrey S. Stewart