

I, _____ (Name) _____, a _____ (Title) _____ of the Federal Bureau of Investigation, being first duly sworn, depose as follows:

1. I have been a _____ (Title) _____ of the Federal Bureau of Investigation for the past _____ years during which time I have been engaged in supervisory and investigatory duties both at Washington, D. C., and in the field. By reason of my experience, I am familiar with the responsibilities and policies of the Federal Bureau of Investigation.

2. I have reviewed the complaint filed in the suit entitled "Emory L. Brown, Jr., Plaintiff, vs John Mitchell, Attorney General of the United States, The Department of Justice of the United States and J. Edgar Hoover, Director of the Federal Bureau of Investigation, Defendants," Civil Action 44-71, filed January 12, 1971, in the United States District Court - District of New Jersey. The information demanded by plaintiff would, if such exists, be contained in the investigative file compiled for law enforcement purposes by the FBI in connection with the assassination of President John F. Kennedy on November 22, 1963. At the present time this file consists of 383* volumes containing 12,600* serials. Some of these "serials," each of which is a separate document, are over 1,400 pages in length.

*Exact number of volumes and serials will be inserted at the time the affidavit is signed.

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ENCLOSURE

3. While the FBI maintains an extensive and detailed indexing system permitting material in its files and records to be located, a search of our indexing systems failed to identify certain of the information requested by plaintiff. However, since plaintiff's demands are based on material originating in the files and records of other law enforcement agencies (principally the Dallas Police Department), to insure that our files do not contain the demanded information in any form would necessitate a detailed, page by page search of a substantial portion of the 983* volumes of this file. Such examination would require utilization of a large number of individuals for an extended period of time. This, in addition to the expense involved, would require reassignment of personnel who are presently carrying out investigatory and supervisory duties under responsibilities assigned to us.

4. The file is, and has been since it was opened on the assassination of President Kennedy, maintained in a "pending" or open status. All information contained in such file was placed there in connection with the investigative responsibilities of the FBI. These responsibilities go beyond the question of whether a prosecution or other law enforcement proceeding might still be initiated against any individual referred to in

*Number of volumes at time of signing of affidavit will be inserted.

this file. Not only is the FBI still actively engaged in investigating fully any allegations that a conspiracy existed relating to or responsible for President Kennedy's death, but the file contains information which would be of inestimable investigative value in the event of a future attempt on the life of a President. The file is replete with techniques and methods used by the FBI and other law enforcement agencies in the investigation of this matter. If revealed, it would seriously hamper the successful investigation of such an occurrence in the future. Lastly, forced revelation of sources of information, many of whom cooperated on the belief that their assistance would be concealed, would tend to jeopardize such cooperation in the future.

5. Release of the requested information would be not only a disservice, but a serious invasion of the right of personal privacy of those whose connection, however innocent, with this investigation might be made known. Investigative files compiled for law enforcement purposes contain all material furnished and developed during the course of the inquiry, some of which may be based on speculation, mistake or on unfounded suspicion. Removed from the context of the investigation as a whole, release of such raw data could result in irreparable injury to the reputation of those identified and could leave them, due to the passage of time, unable to refute any damage to their reputation caused by the revelation.