UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

GREGORY STONE, 1316 N. Harvard Blvd. Los Angeles, CA 90027

and

DR. PHILIP MELANSON, 18 Partridge Place Marion, MA 02738

Plaintiffs

V.

U.S. DEPARTMENT OF JUSTICE 10th & Constitution Ave., N.W. Washington, D.C. 20530

Defendant

:

:

COMPLAINT FOR INJUNCTIVE RELIEF

[Freedom of Information Act, 5 U.S.C. § 552]

JURISDICTION AND PARTIES

- 1. Plaintiffs bring this action under the Freedom of Information Act, 5 U.S.C. § 552, as amended.
- 2. Plaintiff Gregory Stone ("Stone") is an author and researcher who has actively investigated the assassination of Senator Robert F. Kennedy since 1974. During much of that time he worked closely with the late United States congressman and ambassador Allard Lowenstein on questions concerning Senator Kennedy's assassination. He helped Lowenstein with relevant articles and

esentations and drafted a manuscript of over 250 pages detailing central issues of the Kennedy assassination case.

- 3. Plaintiff Dr. Phil Melanson ("Melanson") is a political science professor at Southeastern Massachusetts University. He is a recognized expert on the subject of political violence and assassination.
- 4. Defendant United States Department of Justice ("DOJ" or "the Department") is an agency of the United States and has possession and control of the records requested by plaintiffs which are the subject of this action.

COUNT I

RELEASE OF NAMES OF LAW ENFORCEMENT PERSONNEL

- 5. By letter dated December 22, 1984, plaintiffs submitted Freedom of Information Act ("FOIA") requests to the Federal Bureau of Investigation ("the FBI") for records pertaining to the assassination of Senator Robert F. Kennedy. Identical requests were submitted to FBI Headquarters and the FBI's Los Angeles field office. Pursuant to 5 U.S.C. § 552(a)(4)(A), plaintiffs requested a waiver of search fees and copying costs. See Exhibit 1.
- 6. After a further exchange of correspondence between the parties (<u>see</u> Exhibits 2-4), the FBI granted plaintiff's an 80% reduction in copying costs for all records which had not been previously processed. See Exhibit 5.