

presentations 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 (see 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.