

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

ALAN B. MORRISON

Plaintiff,

v.

CENTRAL INTELLIGENCE AGENCY

Defendant.

Civil Action No. 15-cv-00405 (RC)

**ANSWER**

Defendant the U.S. Central Intelligence Agency (“CIA”) hereby answers the numbered paragraphs of Plaintiff’s Complaint as follows. The unnumbered introductory paragraph consists of Plaintiff’s characterization of his complaint, to which no response is required. Defendant denies that Plaintiff is entitled to any relief.

1. This paragraph contains argument and conclusions of law, not allegations of fact, and thus no response is required.

2. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

3. Admit that CIA is a federal agency. The remaining allegations in this paragraph contain conclusions of law, not allegations of fact, and thus no answer is required.

4-11. The allegations in these paragraphs do not set forth a claim for relief or aver facts in support of a claim to which an answer is required. To the extent a response is deemed necessary, denied.

12. Defendant admits that Plaintiff submitted a FOIA request on March 27, 2014 and respectfully refers the Court to that request for a complete and accurate statement of its contents.

13. Defendant admits that Plaintiff sent a FOIA request and respectfully refers the Court to that request for a complete and accurate statement of its contents. Defendant notes that the FOIA request it received, attached as Exhibit A hereto, differs from the version attached to Plaintiff's Complaint.

14-15. Defendant admits that on or about April 23, 2014, Michele Meeks sent a letter in response to Plaintiff's March 2014 FOIA request and respectfully refers the Court to that letter, attached as Exhibit B hereto, for a complete and accurate statement of its contents.

16. Defendant admits that on or about May 16, 2014, Plaintiff submitted an administrative appeal and respectfully refers the Court to that appeal, attached as Exhibit C hereto, for a complete and accurate statement of its contents.

17. Defendant admits that Plaintiff sent a letter to Defendant on June 30, 2014 and respectfully refers the Court to that letter, attached as Exhibit D hereto, for a complete and accurate statement of its contents. Deny that Plaintiff had not received any response regarding his appeal from Defendant before then; Defendant sent Plaintiff a letter on June 17, 2014, attached as Exhibit E hereto, explaining that Plaintiff's appeal would be considered.

18. Defendant admits that on or about July 15, 2014, Ms. Meeks sent a letter to Plaintiff and respectfully refers the Court to that letter, attached as Exhibit F hereto, for a complete and accurate statement of its contents.

19. Admitted.

20. This paragraph contains conclusions of law, not allegations of fact, and thus no response is required. To the extent a response is deemed necessary, denied.

21. This paragraph contains conclusions of law, not allegations of fact, and thus no response is required. To the extent a response is deemed necessary, denied.

22. This paragraph contains conclusions of law, not allegations of fact, and thus no response is required. To the extent a response is deemed necessary, denied.

The remaining paragraphs of the Complaint contain Plaintiff's requested relief, to which no response is required. To the extent a response is deemed necessary, Defendant denies the allegations contained in the prayer for relief and further avers that Plaintiff is not entitled to the requested relief or any other relief.

### DEFENSES

Defendant denies any and all allegations in the Complaint not expressly admitted herein.

1. Plaintiff has failed to exhaust his administrative remedies.
2. Records at issue are exempt or excluded from disclosure under the Freedom of Information Act.

WHEREFORE, Defendant respectfully requests that the Court enter judgment dismissing this action with prejudice and awarding Defendant costs and such other relief as the Court may deem appropriate.

Dated: May 29, 2015

Respectfully submitted,

BENJAMIN C. MIZER  
Principal Deputy Assistant Attorney General

VINCENT H. COHEN, JR.  
Acting United States Attorney

MARCIA BERMAN  
Assistant Director

/s/ Caroline Anderson  
CAROLINE J. ANDERSON  
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*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 29, 2015, I filed the foregoing document with the Clerk of Court via the CM/ECF system, causing it to be served electronically on Plaintiff's counsel of record.

/s/ Caroline Anderson  
CAROLINE J. ANDERSON