

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

GRANT F. SMITH, <i>PRO SE</i>)	
)	
Plaintiff,)	
v.)	Civil No. 1:15-cv-00224 (TSC)
)	
CENTRAL INTELLIGENCE AGENCY,)	
)	
Defendant.)	
)	

DEFENDANT’S ANSWER TO PLAINTIFF’S COMPLAINT

Defendant Central Intelligence Agency hereby answers the Complaint (Dkt. No. 1) in the following numbered paragraphs, which correspond to the Complaint’s numbered paragraphs:

1. This paragraph sets forth Plaintiff’s characterization of the nature of this action, to which no response is required.
2. This paragraph contains legal conclusions, not factual allegations requiring a response.
3. Deny.
4. Defendant is without knowledge or information sufficient to form a belief about the truth of these allegations.
5. These allegations consist of Plaintiff’s characterization of, and quotes from, documents in the public domain that are cited in the Complaint or attached as an Exhibit to the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that the documents speak for themselves and the Court is respectfully referred to those documents, which are the best evidence of their contents.

6. These allegations consist of Plaintiff's characterization of, and quotes from, documents in the public domain that are cited in the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that the documents speak for themselves and the Court is respectfully referred to those documents, which are the best evidence of their contents.

7. These allegations consist of Plaintiff's characterization of a document that is attached as an Exhibit to the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that the document speaks for itself and the Court is respectfully referred to this document, which is the best evidence of its contents.

8. These allegations consist of Plaintiff's characterization of, and quotes from, documents in the public domain that are cited in the Complaint or attached as an Exhibit to the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that the documents speak for themselves and the Court is respectfully referred to those documents, which are the best evidence of their contents.

9. These allegations consist of Plaintiff's characterization of, and quotes from, documents in the public domain that are cited in the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that the documents speak for themselves and the Court is respectfully referred to those documents, which are the best evidence of their contents.

10. These allegations consist of Plaintiff's characterization of, and quotes from, documents in the public domain that are cited in the Complaint or attached as an

Exhibit to the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that the documents speak for themselves and the Court is respectfully referred to those documents, which are the best evidence of their contents.

11. These allegations consist of Plaintiff's characterization of documents in the public domain that are cited in the Complaint or attached as an Exhibit to the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that the documents speak for themselves and the Court is respectfully referred to those documents, which are the best evidence of their contents.

12. These allegations consist of Plaintiff's characterization of a document that is attached as an Exhibit to the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that the document speaks for itself and the Court is respectfully referred to this document, which is the best evidence of its contents.

13. These allegations consist of Plaintiff's characterization of documents in the public domain that are cited in the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that the documents speak for themselves and the Court is respectfully referred to those documents, which are the best evidence of their contents.

14. These allegations consist of Plaintiff's characterization of documents in the public domain that are cited in the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that

the documents speak for themselves and the Court is respectfully referred to those documents, which are the best evidence of their contents.

15. These allegations consist of Plaintiff's characterization of documents in the public domain that are cited in the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that the documents speak for themselves and the Court is respectfully referred to those documents, which are the best evidence of their contents.

16. Admit the first sentence. The remaining allegations in this paragraph consist of Plaintiff's characterization of, and quotes from, documents in the public domain that are cited in the Complaint or attached as an Exhibit to the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that the documents speak for themselves and the Court is respectfully referred to those documents, which are the best evidence of their contents.

17. Admit that on September 10, 2010, the CIA confirmed receipt of Plaintiff's request and assigned it number F-2010-01201. Deny the remaining allegations.

18. Admit the first sentence. Deny that the CIA segregated and released nothing, and admit the final clause of the second sentence.

19. Admit.

20. Admit that on March 28, 2014, the CIA denied the plaintiff's administrative appeal and did not release additional information. The first clause of the second sentence contains legal conclusions, not factual allegations requiring a response.

Defendant is without knowledge or information sufficient to form a belief about the truth of the allegations in the second clause of the second sentence.

21. This paragraph contains legal conclusions, not factual allegations requiring a response.

22. This paragraph contains legal conclusions, not factual allegations requiring a response.

23. These allegations consist of Plaintiff's characterization of, and quotes from, documents in the public domain that are cited in the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that the documents speak for themselves and the Court is respectfully referred to those documents, which are the best evidence of their contents.

24. These allegations consist of Plaintiff's characterization of documents in the public domain that are cited in the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that the documents speak for themselves and the Court is respectfully referred to those documents, which are the best evidence of their contents.

25. These allegations consist of Plaintiff's characterization of documents in the public domain that are cited in the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that the documents speak for themselves and the Court is respectfully referred to those documents, which are the best evidence of their contents.

26. These allegations consist of Plaintiff's characterization of, and quotes from, documents that are attached as an Exhibit to the Complaint, to which no response is

required. To the extent that a response is required, Defendant denies the allegations on the ground that the documents speak for themselves and the Court is respectfully referred to the documents, which are the best evidence of their contents.

27. These allegations consist of Plaintiff's characterization of, and quotes from, documents that are attached as an Exhibit to the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that the documents speak for themselves and the Court is respectfully referred to the documents, which are the best evidence of their contents.

28. These allegations consist of Plaintiff's characterization of, and quotes from, documents that are attached as an Exhibit to the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that the documents speak for themselves and the Court is respectfully referred to the documents, which are the best evidence of their contents.

29. Deny the first sentence. Regarding the second sentence, as indicated in the CIA's August 28, 2013 and March 28, 2014 response letters to Plaintiff in connection with his FOIA request, CIA admits only to having properly classified documents related to the request that must continue to be protected from release. The third sentence consists of Plaintiff's characterization of documents in the public domain cited in the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that the documents speak for themselves and the Court is respectfully referred to those documents, which are the best evidence of their contents.

30. These allegations consist of Plaintiff's characterization of, and quotes from, a document that is attached as an Exhibit to the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that the document speaks for itself and the Court is respectfully referred to this document, which is the best evidence of its contents.

31. These allegations consist of Plaintiff's characterization of, and quotes from, a document that is attached as an Exhibit to the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that the document speaks for itself and the Court is respectfully referred to this document, which is the best evidence of its contents.

32. These allegations consist of Plaintiff's characterization of, and quotes from, documents in the public domain that are cited in the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that the documents speak for themselves and the Court is respectfully referred to those documents, which are the best evidence of their contents.

33. Defendant is without knowledge or information sufficient to form a belief about the truth of these allegations.

34. Defendant is without knowledge or information sufficient to form a belief about the truth of the allegation in the first sentence. The remaining allegations in this paragraph consist of Plaintiff's characterization of documents in the public domain that are cited in the Complaint, to which no response is required. To the extent a response is required, Defendant denies the allegations on the ground that the documents speak for

themselves and the Court is respectfully referred to those documents, which are the best evidence of their contents.

35. Defendant is without knowledge or information sufficient to form a belief about the truth of these allegations.

36. Defendant is without knowledge or information sufficient to form a belief about the truth of these allegations.

37. Admit that Plaintiff accurately quoted Executive Order 13526 § 3.1(a), but deny the remaining allegations in this paragraph.

38. Deny.

39. These allegations consist of Plaintiff's characterization of documents in the public domain that are cited in the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that the documents speak for themselves and the Court is respectfully referred to those documents, which are the best evidence of their contents.

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41. These allegations consist of Plaintiff's characterization of, and quotes from, documents in the public domain that are cited in the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the

allegations on the ground that the documents speak for themselves and the Court is respectfully referred to those documents, which are the best evidence of their contents.

42. These allegations consist of Plaintiff's characterization of documents in the public domain that are cited in the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that the documents speak for themselves and the Court is respectfully referred to those documents, which are the best evidence of their contents.

43. These allegations consist of Plaintiff's characterization of, and quotes from, documents in the public domain that are cited in the Complaint or attached as an Exhibit to the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that the documents speak for themselves and the Court is respectfully referred to those documents, which are the best evidence of their contents.

44. Defendant is without knowledge or information sufficient to form a belief about the truth of this allegation.

45. This paragraph contains legal conclusions, not factual allegations requiring a response.

46. This paragraph contains legal conclusions and the Plaintiff's opinion, not factual allegations requiring a response.

47. Admit that the CIA is an agency of the United States. The remainder of paragraph 47 states a legal conclusion, not factual allegations requiring a response.

48. Defendant is without knowledge or information sufficient to form a belief about the truth of this allegation.

49. These allegations consist of Plaintiff's characterization of, and quotes from, a document in the public domain that is cited in the Complaint, to which no response is required. To the extent that a response is required, Defendant denies the allegations on the ground that the document speaks for itself and the Court is respectfully referred to the document, which is the best evidence of its contents.

50. This paragraph contains legal conclusions, not factual allegations requiring a response.

51. This paragraph contains legal conclusions, not factual allegations requiring a response.

52. This paragraph contains legal conclusions, not factual allegations requiring a response.

The remaining paragraphs of Plaintiff's Complaint constitute a prayer for relief, to which no response is required. To the extent a response is required, Defendant denies that Plaintiff is entitled to any relief. All remaining allegations not expressly responded to are hereby denied.

Dated: April 29, 2015

Respectfully submitted,

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