IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AMERICAN CIVIL LIBERTIES UNION and AMERICAN CIVIL LIBERTIES UNION FOUNDATION, Plaintiffs, v. CENTRAL INTELLIGENCE AGENCY, *et al*., Defendants.	Civil Action No. 1:16-cv-1256

DECLARATION OF RAMYA KRISHNAN IN SUPPORT OF PLAINTIFFS' CROSS-MOTION FOR PARTIAL SUMMARY JUDGMENT

I, Ramya Krishnan, a member of the Bar of the State of New York, declare under penalty of perjury as follows. I am a staff attorney with the Knight First Amendment Institute at Columbia University, and I represent Plaintiffs in this matter. I submit this declaration in support of Plaintiffs' Cross-Motion for Partial Summary Judgment. Attached to this declaration are true and correct copies of the following documents[1]:

[1] Exhibits A, B, D, F, G, H, and I were produced by the government to Plaintiffs in response to this Freedom of Information Act lawsuit. Exhibit C was released in response to a Freedom of Information Act lawsuit filed by the James Madison Project. Steven Aftergood, *Secrecy News: CIA on Prepublication Review*, Federation of American Scientists (Jan. 22, 2008), https://fas.org/blogs/secrecy/2008/01/cia_on_prepublication_review/ [https://perma.cc/7YJW-JJZV]. Exhibit C is publicly available online. [Redacted], *Agency Prepublication Review of Certain Material Prepared for Public Dissemination*, Federation of American Scientists (May 30, 2007), https://fas.org/irp/cia/prb2007.pdf [https://perma.cc/CU4D-5G9P].

(U) Review Exemption – Definition and Author Cases (May 6, 2009) (Produced by the CIA on April 7, 2017, and redacted pursuant to Exemptions 3 and 6) ..... A

(U) Review Exemption – Definition and Author Cases (May 6, 2009) (Produced by the CIA on August 12, 2019, and redacted pursuant to Exemptions 1, 3, and 6) ..... B

[Redacted], *Agency Prepublication Review of Certain Material Prepared for Public Dissemination* (May 30, 2007) C

AR 13-10, *Agency Prepublication Review of Certain Material Prepared for Public Dissemination* (May 10, 2013) ..... D

Emails between Counsel for Plaintiffs and Counsel for CIA (August 1, 2019; August 5, 2019; August 6, 2019)..... E

Letter from the CIA Publications Review Board to Ms. Valerie E. Wilson (August 8, 2007)..... F

Letter from the CIA Publications Review Board to Mr. John Kiriakou (January 29, 2008)..... G

Letter from the CIA Publications Review Board to Mr. Kevin Shipp (August 5, 2009) ..... H

Letter from the CIA Publications Review Board to Mr. Kevin Shipp (July 13, 2010)..... I

Dated: October 10, 2019

Respectfully submitted,

/s/ Ramya Krishnan

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