UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FREEDOM OF THE PRESS FOUNDATION and KNIGHT FIRST AMENDMENT INSTITUTE AT COLUMBIA UNIVERSITY, Plaintiffs, v. DEPARTMENT OF JUSTICE, NATIONAL SECURITY AGENCY, CENTRAL INTELLIGENCE AGENCY, and OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, Defendants.	No. 1:17-cv-9343-JGK

SUPPLEMENTAL DECLARATION OF LEENA CHARLTON IN SUPPORT OF PLAINTIFFS' CROSS-MOTION FOR PARTIAL SUMMARY JUDGMENT

Pursuant to 28 U.S.C. § 1746, I, Leena Charlton, declare and state as follows:

1. I am an attorney at the Knight First Amendment Institute at Columbia University ("Knight Institute" or the "Institute"). I have served in this role since September 9, 2019.

2. I represent Plaintiffs in this action.

3. I submit this declaration in further support of Plaintiffs' Cross-Motion for Partial Summary Judgment.

4. Attached hereto as Exhibit 1 is a true and correct copy of slides marked FBI 25–33, along with the title slide, marked FBI 20, from a presentation titled "Legal/Policy Issues: Domestic Terrorism Investigations." The slides were released in the FBI's August 31, 2018 production in this matter.

5. Attached hereto as Exhibit 2 is a true and correct copy of a slide titled "What is

Relevance?," from a presentation titled "National Security Letters." Also included is a true and correct copy of the title slide from that presentation. The slides were released to the Electronic Privacy Information Center on February 25, 2019, and are available at https://epic.org/nsl/foia/fbi/EPIC-17-06-13-FBI-FOIA-20190225-Production-pt2.pdf.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed: April 17, 2020

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