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March 5, 2013

Information and Privacy Coordinator
Central Intelligence Agency
Washington, D.C. 20505

Via facsimile: 703-613-3007

Re: Freedom of Information Act Request

We are writing to request the following information on behalf of the Partnership for Civil Justice Fund, the ANSWER Coalition (Act Now to Stop War and End Racism), and Liberation Newspaper, pursuant to the Freedom of Information Act, 5 U.S.C. § 552:

All records and documents, including but not limited to, emails, letters, cables or other communications, memoranda, notes, minutes, photographs, audio recordings, video recordings, digital recordings, intelligence assessments, communications, records or other data that relate to or reference or discuss any information regarding or plans to poison or otherwise assassinate the President of Venezuela, Hugo Chavez, who has just died.

This request is made in light of the U.S. government's acknowledged history of knowledge and possession of information regarding, and/or participation in, attempts to assassinate foreign leaders. The acknowledged attempts by the U.S. Government to assassinate foreign leaders, include Fidel Castro, Rafael Trujillo, and General René Schneider Chereau (*See, e.g.*, January 3, 1975 Memorandum of Conversation between President Gerald Ford and CIA Director William E. Colby, among others [secured by the National Security Archives pursuant to the FOIA]).

This request is also made in light of the exhumation of Palestinian leader Yassar Arafat's body to determine whether his death was caused by poisoning, including media reports that "[t]he Institute de Radiophysique discovered abnormal levels of polonium-210" in his personal effects, Chris McFreal,

The Guardian, November 27, 2012, *Yasser Arafat Exhumed and Reburied in Six-Hour Night Mission: Samples Taken From Corpse of Late PLO Leader Will Be Used to Investigate Claims He Was Poisoned With a Radioactive Substance*, <http://www.guardian.co.uk/world/2012/nov/27/yasser-arafat-exhumed-reburied-night>; *Arafat's Body is Exhumed for Poison Tests*, New York Times, November 28, 2012, <http://www.nytimes.com/2012/11/28/world/middleeast/yasir-arafats-body-is-exhumed-for-poison-tests.html>.

As described further below, the public has an urgent and compelling need for information underlying any effort to assassinate the President of Venezuela, including any knowledge the U.S. government has or had regarding such efforts and in particular any role the U.S. government had in such efforts. According to multiple media sources, the Venezuelan government is also calling for an investigation into the circumstances of President Chavez's illness, specifically whether he was poisoned or deliberately exposed to cancer causing elements. See, e.g. "*Venezuela VP: Chavez's cancer was an 'attack' by his enemies*," NBC News, March 5, 2013, http://worldnews.nbcnews.com/_news/2013/03/05/17196733-venezuela-vp-chavezs-cancer-was-an-attack-by-his-enemies .

We are requesting the information in electronic format where available.

Request for a Fee Waiver and Classification as Representatives of the News Media

Pursuant to the FOIA, we are requesting a complete waiver of fees associated with this request. Disclosure of the information requested is likely to contribute significantly to public understanding of the operations or activities of the federal government.

The requesters have no commercial interest in the information and will disseminate the information to the general public.

The Partnership for Civil Justice Fund is a not-for-profit legal and educational organization which, among, other things, seeks to ensure legal and constitutional accountability within law enforcement and government practices and to review and research practices for such purposes.

The ANSWER Coalition was expressly formed for the purpose of, and is primarily engaged in, disseminating information and informing the public concerning actual or alleged government activity, and mobilizing collective democratic action in response.

Liberation Newspaper is a representative of the news media.

Any information received will be digested and disseminated to the general public through newspaper publication in Liberation, as well as through in-person distribution, publication of articles, through the requesters' respective web sites, and through mass e-mail communications, which dissemination will significantly contribute to the public's understanding of the activities of the federal government.

Request for Expedited Processing

There is an urgency to inform the public about actual or alleged federal government activity, and as described above, the requesters are primarily engaged in disseminating information. Accordingly, we are requesting expedited processing pursuant to the FOIA.

The public has an urgent and compelling need for information underlying any effort to assassinate the President of Venezuela, including any knowledge the U.S. government has or had regarding such efforts and in particular any role the U.S. government had in such efforts. Expedited disclosure is necessary to inform and express public opinion, in order to ensure government accountability for decisions and activities regarding any covert effort by the U.S. government to assassinate a democratically elected leader.

The public has a right and significant interest to engage in independent fact-finding necessary to evaluate allegations and acts of U.S. Government officials in the aforementioned matters. The public interest overwhelmingly favors the disclosure of information related to violations of the public trust by government officials and agencies.

This request clearly meets the criteria for expedited processing under 32 C.F.R. § 1900.34 as information that is urgently needed that “has a particular value that will be lost if not disseminated quickly” as a “breaking news story of general public interest.” Similarly, the information is urgently needed “in order to inform the public concerning actual or alleged Federal Government activity.”

The need for expedited processing is true and correct to the best of our knowledge and belief and the requesters will disseminate any information received to the general public to inform public understanding of government activities and operations using the means of dissemination described above.

In the Event of Denial

If this request is denied in whole or in part, please provide the basis for each such denial or deletion by reference to the specific exemption of the Act which you assert is applicable.

Request for All Portions of Material for Which No Exemption to Production is Claimed

Please provide all segregable portions of otherwise exempt material.

We reserve the right to appeal your decision to withhold any information or deny a waiver of fees or expedited processing.

Sincerely,



Mara Verheyden-Hilliard