

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

AMERICAN CIVIL LIBERTIES )  
UNION OF MASSACHUSETTS, INC., )

Plaintiff, )

vs. )

THE CENTRAL INTELLIGENCE )  
AGENCY, *et al.*, )

Defendants. )

Civil Action No. 1:22-cv-11532

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**NOTICE OF COMPLIANCE**

Defendants the Central Intelligence Agency (“CIA”), the Office of the Director of National Intelligence (“ODNI”), the United States Department of Defense (“DoD”), and the National Security Agency (“NSA”) (collectively, “Defendants”) hereby provide notice of their compliance with the Court’s Orders of May 11, 2023, and May 22, 2023, *see* ECF Nos. 33 and 36. Specifically, on June 23, 2023, Defendants provided the attached letter to Plaintiff’s counsel supplementing Defendants’ responses to Plaintiff’s Freedom of Information Act request.

Dated: June 23, 2023

Respectfully submitted,

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney General

ELIZABETH J. SHAPIRO  
Deputy Director  
Federal Programs Branch

/s/ Julia A. Heiman  
JULIA A. HEIMAN (D.C. Bar No. 986228)  
Senior Counsel

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**CERTIFICATE OF SERVICE**

I hereby certify that this document was filed through the ECF system and will therefore be sent electronically to Plaintiff's counsel identified on the Notice of Electric Filing (NEF).

/s/ Julia A. Heiman  
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June 23, 2023

**Via Email**

Daniel McFadden  
Staff Attorney  
ACLU of Massachusetts  
One Center Plaza, Suite 850  
Boston, MA 02108

Re: *Am. Civil Liberties Union of Mass., Inc. v. Central Intelligence Agency, et al.*,  
Civil Action No. 22-cv-11532

Dear Mr. McFadden:

Pursuant to the Court's orders of May 11, 2023, and May 22, 2023, *see* ECF Nos. 33 and 36, I am writing to convey Defendants' supplemental responses to your Freedom of Information Act request of August 15, 2022. Each of the Defendants<sup>1</sup>, respectively, supplements its response as follows: the agency possesses no records responsive to your request.

Best regards,

*/s/ Julia A. Heiman*

JULIA A. HEIMAN  
Senior Counsel

United States Department of Justice  
Civil Division, Federal Programs Branch

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<sup>1</sup> Defendants are the Central Intelligence Agency, the Office of the Director of National Intelligence, the United States Department of Defense, and the National Security Agency.