

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CITIZENS UNITED,)	
)	
Plaintiff,)	
)	
v.)	Civil No. 18-1862-RDM
)	
UNITED STATES DEPARTMENT OF STATE,)	
)	
Defendant.)	

PLAINTIFF'S STATEMENT OF GENUINE ISSUES

Pursuant to Local Civil Rule 7(h), Plaintiff Citizens United hereby submits this Statement of Genuine Issues in response to Defendant's Statement of Material Facts as to Which There Is No Genuine Issue (ECF No. 13-2). The numbered paragraphs below correspond to the numbered paragraphs in the State Department's Statement.

A. Citizens United's FOIA Request

1. Not disputed.
2. Not disputed.
3. Not disputed.
4. Not disputed.
5. Not disputed.
6. Not disputed.

B. FOIA Exemptions

1. Exemption 1

7. Not disputed that it is classified; disputed as to whether it is properly classified, exempt, and lawfully withheld.
8. Not disputed that this is what Defendant claims; disputed that document is exempt and lawfully withheld.
9. Not disputed that this is what Defendant claims; disputed that document is exempt and lawfully withheld.
10. Not disputed that this is what Defendant claims; disputed that document is exempt and lawfully withheld.
11. Not disputed that this is what Defendant claims; disputed that document is exempt and lawfully withheld.
12. Not disputed that this is what Defendant claims; disputed that document is exempt and lawfully withheld.
13. Not disputed that this is what Defendant claims; disputed that document is exempt and lawfully withheld.
14. Not disputed that this is what Defendant claims; disputed that document is exempt and lawfully withheld.
15. Not disputed that this is what Defendant claims; disputed that document is exempt and lawfully withheld.
16. Not disputed that this is what Defendant claims; disputed that document is exempt and lawfully withheld.
17. Not disputed that this is what Defendant claims; disputed that document is exempt and lawfully withheld.

2. Exemption 3

- 18. Not disputed.
- 19. Not disputed that this is what Defendant claims; disputed that document is exempt and lawfully withheld.
- 20. Not disputed that this is what Defendant claims; disputed that document is exempt and lawfully withheld.

3. Exemption 7(E)

- 21. Not disputed that this is what Defendant claims; disputed that document is exempt and lawfully withheld.
- 22. Not disputed that this is what Defendant claims; disputed that document is exempt and lawfully withheld.
- 23. Not disputed that this is what Defendant claims; disputed that document is exempt and lawfully withheld.
- 24. Not disputed that this is what Defendant claims; disputed that document is exempt and lawfully withheld.
- 25. Not disputed that this is what Defendant claims; disputed that document is exempt and lawfully withheld.
- 26. Not disputed that this is what Defendant claims; disputed that document is exempt and lawfully withheld.
- 27. Not disputed.
- 28. Not disputed.
- 29. Not disputed.

30. Not disputed.

4. Exemptions 7(C) and 6

31. Not disputed.

32. Not disputed.

33. Not disputed.

34. Not disputed.

35. Not disputed.

36. Not disputed.

C. Segregability

37. Not disputed that this is what Defendant claims; disputed that segregable information was lawfully withheld.

Respectfully submitted,

/s/

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CITIZENS UNITED

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