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## WINDELS, MARX, DAVIES & IVES

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February 25, 1991

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

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

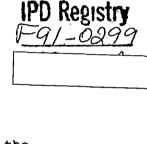
## FREEDOM OF INFORMATION ACT REQUEST

Dear Sir or Madam:

This is a request for information pursuant to the Freedom of Information Act (the "FOIA"), 5 U.S.C. § 552.

We are the attorneys representing Pan American World Airways, Inc. ("Pan Am"), Alert Management Systems, Inc. and Pan Am World Services, Inc. in the litigation arising out of the bombing and crash of Pan Am Flight 103 at Lockerbie, Scotland, on December 21, 1988. We hereby request access to the following records, or copies thereof:

All records evidencing, concerning or in any way 1. relating to warnings, tips, alerts, intelligence and any other communications and/or information received at any time between July 1, 1988 and December 21, 1988, inclusive, evidencing, concerning or in any way relating to any plans, or suspected or threatened plans, by any person or organization to plant a bomb, make an assault or APPROVED FOR RELEASE Frankfurt Rhein-Main Airport, near Frankfurt, West DATE: JAN 2006 Germany, at any time during the last six months of 1988 including, but not limited to, against Pan Am or against any other United States flag carrier.



Information and Privacy Coordinator Central Intelligence Agency February 25, 1991 Page 2

- All records evidencing, concerning or in any way relating to warnings, tips, alerts, intelligence and any other communications and/or information received at any time between July 1, 1988 and December 21, 1988, inclusive, evidencing, concerning or in any way relating to any plans, or suspected or threatened plans, by any person or organization to plant a bomb, make an assault or commit any other form of terrorist attack at London Heathrow Airport or Gatwick Airport near London, England, at any time during the last six months of 1988 including, but not limited to, against Pan Am or against any other United States flag carrier.
- All records evidencing, concerning or in any way 3. relating to warnings, tips, alerts, intelligence and any other communications received from the government of Israel or from any agency of the government of Israel during December 1988 concerning an impending attack against civil aviation, including, but not limited to, an attack against Pan Am or against any other United States flag carrier, and including, but not limited to, records and/or information obtained by Israel as a result of its raid on a base of the Popular Front for the Liberation of Palestine-General Command near Damour, Lebanon on or about December 8, 1988.
- All records evidencing, concerning or in any way relating to the involvement or possible involvement of a man named, or code named, David Lovejoy in the bombing of Pan Am Flight 103 on December 21, 1988.
- All records evidencing, concerning or in any way relating to the involvement or possible involvement of any, all or any combination of the following individuals in the bombing of Pan Am Flight 103 on December 21, 1988:

√a. Rashid Mehmet;

J c. Hoayro Karabejian;
J d. Monzer al-ve-

Monzer al-Kassar; and

јe. Mohammed al-Nayyidi (a/k/a al-Marzouk).

All records evidencing, concerning or in any way relating to telephone and/or other forms of communication during November and/or December 1988 between any individual and the Iranian Embassy in

WINDELS, MARX, DAVIES & IVES

Information and Privacy Coordinator Central Intelligence Agency February 25, 1991 Page 3

> Beirut, Lebanon, evidencing, discussing, reporting on or relating in any way to the travel plans and/or travel schedule of any, all or any combination of the following individuals:

- a. Matthew Gannon;
- b. Charles McKee;
- c. Ronald Larivier; and
- d. Daniel O'Connor.
- 7. All records evidencing, concerning or in any way relating to:
  - a. who planned the bombing of Pan Am Flight 103 on December 21, 1988;
  - b. how the bomb which destroyed Pan Am Flight 103 on December 21, 1988 was placed on board ; the flight;
  - c. when the bomb which destroyed Pan Am Flight 103 on December 21, 1988 was placed on board the flight;
  - d. where the bomb which destroyed Pan Am Flight 103 on December 21, 1988 was placed on board the flight;
  - e. why the bomb which destroyed Pan Am Flight 103 on December 21, 1988 was placed on board the flight; and
  - f. who knew, prior to its explosion, that the bomb which destroyed Pan Am Flight 103 on December 21, 1988 had been placed on board the flight.
- 8. All records evidencing, concerning or in any way relating to FOIA requests submitted to the Central Intelligence Agency (or submitted to other agencies that have referred such requests to the Central Intelligence Agency) by parties other than the undersigned, seeking access to information contained in some or all of the records described in Item Nos. 1 through 7, set forth above, or in any way relating to or concerning the crash of Pan Am Flight 103 at Lockerbie, Scotland, on December 21, 1988.

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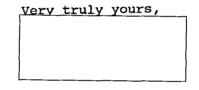
- WINDERS MARX. DAVIES & IVES

Information and Privacy Coordinator Central Intelligence Agency February 25, 1991 Page 4

9. All records evidencing, concerning or in any way relating to the response or responses of the Central Intelligence Agency to the requests and/or referrals described in Item No. 8, above.

We are willing to pay your reasonable search and/or copying costs incurred to comply with this request.

Please contact the undersigned if you have any questions concerning the above-listed items. As mandated by the FOIA, we expect a response to this request to be made within ten (10) days of its receipt.



CERTIFIED MAIL ARTICLE NUMBER:

P 109 731 594