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WRITER'S DIRECT DIAL NUMBER

(212) 237-1066

February 25, 1991

**VIA CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

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

IPD Registry  
F91-0299  


**FREEDOM OF INFORMATION ACT REQUEST**

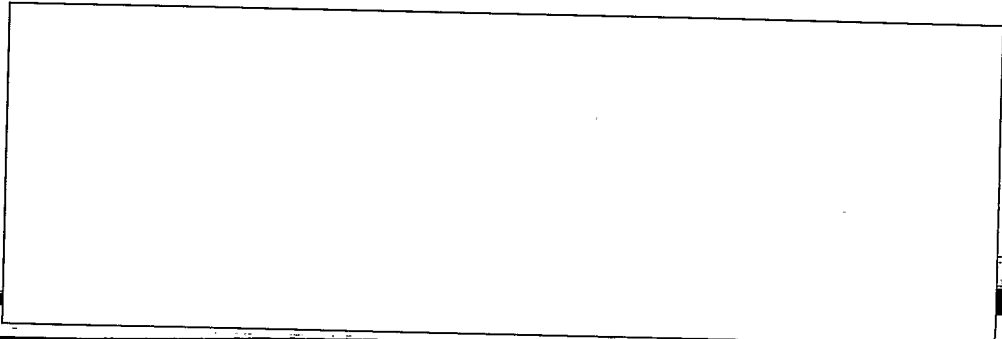
Dear Sir or Madam:

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:

1. 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 Frankfurt Rhein-Main Airport, near Frankfurt, West 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.

APPROVED FOR RELEASE  
DATE: JAN 2006



~~WANT TO KNOW ABOUT DAVID LOVEJOY~~

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Central Intelligence Agency  
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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.
3. All records evidencing, concerning or in any way 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.
4. 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.
5. 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;
  - ✓ b. Mohammed Hatimi;
  - ✓ c. Hoayro Karabedian;
  - ✓ d. Monzer al-Kassar; and
  - ✓ e. Mohammed al-Nayyidi (a/k/a al-Marzouk).
6. 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

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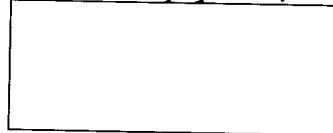
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9. All records evidencing, concerning or in any way relating to the response or responses of the Central Intelligence Agency to the requests and/or referrals described in Item No. 8, above.

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.

Very truly yours,



CERTIFIED MAIL ARTICLE NUMBER:

P 109 731 594



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## ZUCKERMAN, SPAEDER, GOLDSTEIN, TAYLOR &amp; KOLKER

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 ELLEN FISHBEIN MILLS

\*NOT ADMITTED IN D.C.

(202) 778-1838  
 WRITER'S DIRECT DIAL NUMBER:

JOHN F. EVANS (1941-1988)

July 31, 1991

Central Intelligence Agency  
 Attn.: John H. Wright  
 Information and Privacy Coordinator  
 Washington, D.C. 20505

Re: Freedom of Information Act Request

Dear Mr. Wright:

This is a request on behalf of Industries Cardoen, Ltd., and for records pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552. This request is also submitted pursuant to the regulations issued by the Central Intelligence Agency ("CIA") concerning FOIA requests, which are published at 32 C.F.R. § 1900 et seq. We request access to any record pertaining to

Industries Cardoen, Ltd.

In this regard, we request a complete and thorough search for all records maintained in any form (including electronically) and under the control of the CIA that pertain to Industries Cardoen, Ltd. Responsive records include those that concern any information or investigation that relate to the activities of the above entity or individual.

APPROVED FOR RELEASE  
 DATE: JAN 2006

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We ask that you provide to us any record responsive to this request once you determine that it will not be withheld rather than delay its release until all records to be released are disclosed. If the agency is unable to locate any "missing" record or file within the ten day period set forth in 5 U.S.C. § 552(a)(6)(A)(i), then please place any such "missing" record or file on "special locate" status and advise us that you have done so.

Should the CIA determine that any portion of a record is exempt from disclosure then we ask that the agency use its discretion to release it anyway. In the event an exemption is claimed, please provide to us all segregable non-exempt portions of any withheld record, as required by 5 U.S.C. § 552(b). When deleting material, please "blackout" rather than "whiteout" or "cutout" any portions as to which an exemption is claimed.

Pursuant to 5 U.S.C. §§ 552(a)(6)(A)(i) and 552(b), if the request for records is denied either in part or in whole, please specify in writing which exemption(s) is (are) claimed for each portion of a record withheld. Please provide a detailed description of each record withheld, including the author(s) and any recipients, the date of its creation, its subject matter, and its current physical location. In addition, please provide the reason that each record falls within each exemption claimed for it. Please also specify the number of pages in each record and the total number of pages pertaining to this request.

We believe that this request qualifies for a waiver of fees associated with processing this request because disclosure of the requested records would be "in the public interest" and would not be "primarily in the commercial interest" of the requestor. 5 U.S.C. § 552(a)(4)(A)(iii). However, if you do not grant a fee waiver, please contact our office before proceeding only in the event that the fee is in excess of \$250.00 (Two Hundred Fifty Dollars).

Please send a memorandum, with a copy to our law firm, to the appropriate divisions, branches and other components in the CIA to notify them that they must search for responsive records and to assure that no such records are destroyed. Please advise us of any destruction of records and indicate the authority for any such destruction.

If you have any questions concerning this request, please contact my office at (202) 778-1838. We would prefer, as time is of the essence, that you call rather than write if you have any questions or require additional information.

Mr. John H. Wright  
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As set forth in 5 U.S.C. § 552(a)(6)(A)(i), we expect a response to this request within ten working days. Please send all records directly to our law firm.

Sincerely yours,



Eleanor H. Smith

cc: Roberto Martinez, Esquire

A:EHSMISCIA.LTR