

Exhibit “B”

TRANSCRIPT OF PROCEEDINGS

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES NATIONAL
STUDENT ASSOCIATION,**

PLAINTIFF

v.

CENTRAL INTELLIGENCE AGENCY,

DEFENDANT

**CIVIL ACTION
NO. 83-1686**

DEPOSITION OF LOUIS J. WISE

**Langley, Virginia
December 21, 1983**

Pages 1 thru 101

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THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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UNITED STATES NATIONAL	:
STUDENT ASSOCIATION,	:
	:
Plaintiff	:
	:
v.	:
	:
CENTRAL INTELLIGENCE AGENCY,	:
	:
Defendant	:
	:
-----x	

Civil Action
No. 82-1686

Langley, Virginia
Wednesday, December 21, 1983

Deposition of LOUIS J. DUBE, called for examination
by counsel for Plaintiff, pursuant to notice, at the offices
of the Central Intelligence Agency, Langley, Virginia, at
10:00 o'clock a.m., Wednesday, December 21, 1983, before
Mary Surplice Smith, a Notary Public in and for the
Commonwealth of Virginia at large.

APPEARANCES:

On behalf of Plaintiff:

DAVID L. SOBEL, Esq.
Dobrovir, Oakes & Gebhardt
1025 Vermont Avenue, N.W.
Suite 1105
Washington, D. C. 20005

1 have in that component, wouldn't any large public revelation
2 of a CIA activity tend to be recoverable there?

3 A I wouldn't say that there --

4 MR. JAKSETIC: Excuse me a second. I am not sure
5 this is really a proper line of questioning, asking him to
6 make suppositions about whether there may or may not be docu-
7 ments in a particular directorate. You are asking more than
8 personal knowledge; you are asking him to speculate about
9 matters.

10 MR. SOBEL: That is basically because the Agency's
11 position is, apparently, that Mr. Dube is the only individual
12 that will be provided for deposition, and my understanding is
13 that he is the individual who is primarily responsible for
14 providing the Agency's responses in terms of the adequacy of
15 the search.

16 MS. TASKER: That is correct, because all documents ar
17 Directorate of Operations documents.

18 MR. JAKSETIC: Would you mind if I just confer with
19 co-counsel for a moment?

20 (Record temporarily suspended)

21 MR. SOBEL: Back on the record.

22 BY MR. SOBEL:

23 Q Now, in response to Interrogatory No. 10, the Agency

1 responds that in order to fully answer this interrogatory -
2 quote - all CIA files or systems of records would need to be
3 searched. Is that your understanding of the Agency's obli-
4 gation?

5 A There is no way that any man in this building can
6 say that, when they search every directorate, that they have
7 retrieved every document on the subject. That is not to say
8 that there isn't another document that has information about
9 the National Student Association, but if the document is not
10 indexed to that, you can't retrieve it.

11 Q But didn't you tell me earlier that a reference to
12 the National Student Association within the text would be
13 sufficient?

14 A You see, there is a criteria for indexing. When
15 we started off back in the '40s, we used to index every name
16 and every organization that came in. Well, you know, you got
17 a pile of printouts on Franklin D. Roosevelt like this, and
18 we said, well, we can't go on doing this, so we said, okay,
19 we are not going to index the names of famous people any more
20 because we don't need it, and we established what our own
21 particular file system was meant to reflect.

22 Now, in the Directorate of Operations we are
23 interested in operations, counterintelligence, intelligence