

IN THE
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 16-61289-Civ-Altonaga/O’Sullivan

BROWARD BULLDOG, INC., a Florida)
corporation not for profit, and DAN)
CHRISTENSEN, founder, operator and editor)
of the FloridaBulldog.com website,)
)
Plaintiffs,)
)
v.)
)
U.S. DEPARTMENT OF JUSTICE, 950)
Pennsylvania Avenue, NW, Washington,)
DC 20530, and FEDERAL BUREAU OF)
INVESTIGATION, 935 Pennsylvania Avenue,)
NW, Washington, DC 20535,)
)
Defendants.)
)

Declaration of Dan Christensen In Opposition to the
Defendants’ Motion for Summary Judgment on Counts 2 and 3

I, Dan Christensen, declare under penalty of perjury that the following statement is true and correct:

1. My name is Dan Christensen. I am a plaintiff in this lawsuit. I have personal knowledge of the following facts.

2. Through this action, Broward Bulldog, Inc. and I (collectively “the Bulldog”) seek records that the FBI created or compiled in connection with work performed by the 9/11 Review Commission (referred to herein as “the Meese Commission”) – a panel that Congress directed the FBI to establish in January 2014 to conduct a “comprehensive external review of the implementation of the recommendations related to the FBI that were proposed by the National Commission on Terrorist Attacks Upon the United States (commonly known as the 9/11

Commission)” and to assess new evidence.¹

3. The Meese Commission consisted of Edwin Meese, III, Bruce Hoffman and Timothy J. Roemer. It completed its work and released a report, *The FBI: Protecting the Homeland in the 21st Century -- Report of the Congressionally-directed to The Director of the Federal Bureau of Investigation* (hereinafter “the Meese Report”), on March 25, 2015. A copy of the relevant pages of the Report are attached to the complaint as Exhibit 1.

4. The complaint is based on three separate, but related, Freedom of Information Act (“FOIA”) requests, one dated April 8, 2015, and two others, both of which are dated July 4, 2015, and the responses that the FBI provided to each of the three related requests.

5. The records are sought, in part, to ascertain the basis for and reliability of the Meese Report’s findings and recommendations, including its finding that an FBI report dated April 16, 2002, attached to the complaint as Exhibit 2, was “poorly written” and wholly unsubstantiated, even though the April 16, 2002, report found ““many connections” between a Saudi family that fled Sarasota, Florida weeks before September 11, 2001, and ‘individuals associated with the terrorist attacks on 9/11/2001’.” Complaint Exhibit 1 at 106.

6. The Bulldog believes that the Meese Report’s finding is false, unsupported by credible evidence, and intended to discredit truthful facts accurately reported in the April 16, 2002, FBI report.

7. The Bulldog further believes that the Meese Report’s finding is designed to disguise the fact that in the aftermath of the 9/11 attacks, the FBI found credible evidence that the Kingdom of Saudi Arabia supported and assisted the hijackers who attacked the United States on 9/11/2001, but the FBI concealed this evidence from Congress and the public, and that

¹ Explanatory Statement accompanying P.L. 113-6 at S1305 (March 11, 2013).

it is continuing to do so in violation of FOIA to protect the United States' relationship with Saudi Arabia or to conceal its own malfeasance.

8. The FBI produced the April 16, 2002, report to the Bulldog only after the Bulldog sued the FBI in a prior action. That lawsuit remains pending as *Broward Bulldog, Inc. v. U.S. Department of Justice*, No. 12-61735-Civ-Zloch (S.D. Fla.).

9. Broward Bulldog, Inc. owns and operates an Internet website under the name *FloridaBulldog.com*.

10. I am the founder, operator, and editor of the FloridaBulldog.com website, which was formerly known as BrowardBulldog.com. Prior to creating the Bulldog website, I worked as an investigative reporter for *The Miami Herald* and *Daily Business Review*. I have been recognized for my work as a journalist with various awards, including the Sigma Delta Chi Foundation's Eugene S. Pulliam First Amendment Award in 2004 for reporting on secret court cases in a U.S. District Court in Miami.

11. In September, 2011, I and another reporter and author, Anthony Summers, interviewed the property manager of the gated Prestancia subdivision of Sarasota, Florida; a senior administrator and security officer for the Prestancia Community Association; and the next door neighbor of Abdulaziz and Anoud Al-Hijji, a couple that had lived at 4224 Escondido Circle in Prestancia. They told us the al-Hijjis were part of a wealthy Saudi family with connections to the Saudi royal family and that they had abruptly departed their Sarasota home Sarasota about two weeks before September 11, 2001.

12. They told us that after they alerted the FBI to the possibility that the al-Hijjis had aided the hijackers, the FBI searched the al-Hijjis' deserted home, found property including a new car had been hurriedly abandoned, and discovered that Prestancia gatehouse sign-in logs and

photographs of license plates showed cars used by 9/11 ringleader Mohamed Atta and other hijackers had visited the family's home.

13. Summers and I first reported about this FBI investigation in an article published on the *FloridaBulldog.com* website on September 8, 2011. *The Miami Herald* republished the article. The article included information from my interview of former U.S. Senator D. Robert Graham, who had co-chaired a Congressional Joint Inquiry regarding 9/11. He told me the FBI had never disclosed the existence of this Sarasota investigation to Congress and that he was troubled to be learning of this only then.

14. The following day, the FBI publicly admitted that it had conducted the investigation, but also asserted that it had found no connection between the Saudi family and the terrorist attacks on the United States, and, contrary to what Sen. Graham told me, it had disclosed its Sarasota investigation to Congress.

15. I contacted Sen. Graham about the FBI's assertion and he vehemently disputed that the FBI had disclosed its Sarasota investigation to Congress. In essence, he told me that the FBI was lying.

16. The conflict between the statement provided by witnesses in Sarasota and Sen. Graham to me, and the public statements of the FBI, created the appearance that the FBI was concealing a matter of great public importance, and this made it imperative for the Bulldog to obtain any records of the FBI's Sarasota investigation as well as any other law enforcement agency records of that investigation that might exist.

17. The Bulldog requested in 2011 that the FBI produce its records regarding the Sarasota investigation. At about the same time, the Bulldog also asked the Florida Department of Law Enforcement ("FDLE") to produce its records regarding the Sarasota investigation. On

December 21, 2011, the Florida Department of Law Enforcement produced to the Bulldog its records, attached as Exhibit A, showing that on April 7, 2004, the FBI had interviewed Wissam Taysir Hammoud and that he told the FBI that Abdulaziz al-Hijji was “a heavy drinker and smoker of cannabis, however very well schooled in Islam.” Hammoud reportedly said al-Hijji spoke about taking flight training at the Venice Airport, that he planned to go to Afghanistan to become a freedom fighter or Mujahedin and wanted Hammoud to join him, and that Osama Bin Laden was his hero. He also said al-Hijji had introduced him to Adnan El Shukrijumah, a senior member of al-Qaeda. The FDLE records also showed that the father of Anoud Ghazzawi al-Hijji was Esam Ghazzawi, reportedly a businessman who was an advisor to the late Prince Fahd bin Salman Abdulaziz al Saud, the eldest son of the current king of Saudi Arabia.

18. After the FBI declined to produce its own records of the Sarasota investigation, the Bulldog sued the FBI on September 5, 2012, asserting that the FBI had violated FOIA in failing to produce its Sarasota records.

19. After filing the suit, the Bulldog pressed the FBI, through counsel, to admit that it had many records of the Sarasota investigation, confronted it with evidence of the existence of those documents, including the testimony of former Sen. Graham who had served as co-chair of the Congressional Joint Inquiry into 9/11 in 2001 and 2002, and the FDLE records. The FBI initially insisted that it could not locate any responsive documents.

20. In the meantime, and unbeknownst to the Bulldog, Congress appropriated funds on March 26, 2013, to the FBI to form the Meese Commission to evaluate, among other things, the Bulldog’s reporting. *See* P.L. 113-6, 127 Stat. 197, 247 (113th Cong., 1st Sess., Mar. 26, 2013).

21. Two days later, on March 28, 2013, the Bulldog received from the FBI a

supplemental response to its 2011 FOIA request. The response stated the Justice Department had located 35 pages of responsive records, that 4 pages were being withheld entirely, and that 31 redacted pages were being produced.

22. The records included an FBI Report dated April 16, 2002, Exhibit 2 to the complaint, which indicated, contrary to the FBI's public statements, but consistent with the FDLE records the Bulldog had obtained in 2011, that the FBI had in fact found "many connections" between the Saudi family that left Sarasota shortly before September 11, 2001, and "individuals associated with the terrorist attacks on 9/11/2001." The document confirmed that the family had fled the United States shortly before September 11, 2001, and that one family member had attended a flight training school where the terrorists trained for their attacks. The Bulldog and other media identified Special Agent Gregory J. Sheffield as author of the report.²

23. It seemed highly improbable that the FBI had only 35 pages of records relating to an investigation that had resulted in these important findings, so the Bulldog urged Judge William Zloch to order the FBI to conduct a more thorough search.

24. On April 4, 2014, Judge Zloch, after reviewing declarations by me and Sen. Graham, attached as Exhibits B and C, and additional declarations by Larry Berberich, Jone

² Lucy Morgan, *Does a Classified Sarasota Investigation Hold Shocking Truths About 9/11?* (Oct. 26, 2016) (<https://www.sarasotamagazine.com/articles/2016/10/26/secrets-and-lies>); Lucy Morgan, *Why Did the FBI Detain Bob Graham?* Tampa Bay Times (Aug. 7, 2015) (<http://www.tampabay.com/news/perspective/why-did-the-fbi-detain-bob-graham/2240486>); Michael Pollick, *FBI Denounces Own Report Linking Sarasota Family to 9/11*, Sarasota Herald-Tribune (March 26, 2015) (<http://www.heraldtribune.com/news/20150326/fbi-denounces-own-report-linking-sarasota-family-to-911>); Dan Christensen & Anthony Summers, *Down the Rabbit Hole with the FBI: Saying 9/11 Documents Don't Exist When They Do.*, floridabulldog.com (June 25, 2014) (<http://www.floridabulldog.org/tag/gregory-sheffield/>); Dan Christensen & Anthony Summers, *Did the 9/11 hijackers have accomplices? Once secret FBI records spark push to find out*, floridabulldog.com (April 16, 2013) (<http://www.floridabulldog.org/tag/agent-gregory-sheffield/>).

Barlow Weist, and Patrick Gallagher, attached as, Exhibits D, E, and F – Sarasota residents who had been sources for the Bulldog’s initial reporting about the Sarasota investigation, -- and denying the FBI’s summary judgment motion, granted the Bulldog’s motion to direct the FBI to conduct a more thorough search for records of its Sarasota investigation.³ Judge Zloch found that the FBI’s “eagerness to assert exemptions and wooden method of interpreting Plaintiffs’ FOIA requests essentially deprives the Court of its role in examining relevant documents.” Exhibit G-2 at 7. He also found the FBI’s public statements about its Sarasota investigation “seem to be in conflict” with the documents it had produced, and “there is nothing in Defendants’ thirty-five produced pages that reconciles this stark contradiction.” Exhibit G-2 at 14.

25. After using the search methods ordered by Judge Zloch, the FBI located and produced redacted versions of 46 additional pages of additional records. These records included, among other things, an FBI report dated April 3, 2002. Exhibit H. This document like the April 16, 2002, FBI report also stated the FBI had found a wealthy Saudi family living in Sarasota had “many connections” to the attacks on September 11, 2001. This document also marshalled other evidence that a hijacker-support network existed in the Sarasota region and requested further investigation. The report stated that on October 31, 2001, a man was observed disposing of “a self-printed manual on terrorism and Jihad, a map of the inside of an unnamed airport, a rudimentary last will and testament, a weight to fuel ratio calculation for a Cessna 172 aircraft, flight training information from the Flight Training Center in Venice and printed maps of Publix shopping centers in Tampa Bay.” That Flight Training Center is reportedly where Ziad Jarrah, hijacker of United Flight 93, took flying lessons. The FBI redacted parts of this document,

³ I have not included the exhibits to the declarations due to their voluminous nature, but they are available in the case pending before Judge Zloch and copies will be provided if the Court regards them as necessary to address the issues raised in this case.

claiming the information had been “specifically authorized under criteria established by [presidential] executive order to be kept secret in the interest of national defense or foreign policy.”

26. Also in response to Judge Zloch’s April 4, 2014, order to conduct a more thorough search for Sarasota investigation records, the FBI reported that it had located 23 boxes containing 80,266 pages of additional records in the Tampa Field Office of the FBI which had been placed in its PENTTBOMB investigation file. The FBI asserted that all of these documents had been classified as “Secret.”

27. Over the FBI’s objections, Judge Zloch directed the FBI to produce all of the records to him for *in camera* inspection. It notified the Bulldog that it submitted electronic copies of the records to Judge Zloch *in camera* on May 1, 2014, and began producing physical copies of the documents to the Court after installing a safe designed to hold classified documents in Judge Zloch’s chambers.

28. On March 25, 2015, the Meese Commission released the unclassified portions of its report. It stated the Commission had investigated “claims of allegedly new evidence in the press” regarding “a Sarasota family that was alleged to have suspiciously left the United States shortly before the 9/11 attacks. Complaint Exhibit 1 at 100. In a section entitled “Key Points,” the report stated “suspicions regarding a Saudi family resident in Sarasota before the 9/11 attacks did not hold up under scrutiny.” Complaint Exhibit 1 at 101.

29. At page 105, the Report stated that “the *Broward Bulldog*, an online local investigative newspaper, reported that the FBI allegedly had ‘found troubling ties between the hijackers and residents in an upscale community’ near Sarasota, Florida,” and that this information had not been “shared with Congress.” Complaint Exhibit 1 at 105-06. It further

recited that “an FBI document that had been produced pursuant to a Freedom of Information Act request,” reportedly indicated the FBI had found ““many connections”” between the family and individuals associated with the 9/11 attacks.

30. The Report stated: “The FBI told the [Meese] Commission that the FBI Electronic Communication (EC) on which the news article was based was ‘poorly written’ and wholly unsubstantiated. When questioned later by others in the FBI, the special agent who wrote the EC was unable to provide any basis for the contents of the document or explain why he wrote it as he did.”⁴ Complaint Exhibit 1 at 106. A footnote to this statement, cited “Memorandum for the Record, April 30, 3014.” Complaint Exhibit 1 at 106 n. 356.

31. The Report also stated that the Meese Commission requested and received a briefing regarding the Sarasota investigation, that the Commission “obtained a copy of the case file, copies of documents released through the Freedom of Information Act regarding the matter, and reports of interviews,” and that the FBI told the Commission that “the FBI had in fact ‘found no evidence that connected the family members in the Miami Herald article to any of the 9/11 hijackers, nor was there any connection found between the family and the 9/11 plot.’” Complaint Exhibit 1 at 106.

32. The Report stated that “Over several years, the FBI interviewed numerous individuals with direct knowledge of the facts forming the basis of the suspicious activity,” and found the “leads were determined to be covered and no further action was needed.” Complaint Exhibit 1 at 106. The Report did not say how “the leads were covered” or why “no further action was necessary.”

⁴ The “Electronic Communication” referenced in the Report appears to be the April 16, 2002, FBI Report, Complaint Exhibit 2.

33. The Report continued on to say “the statements in the EC were incorrect,” the “FBI found no evidence of contact, between the hijackers and the family,” that its allegations were “not substantiated,” and the Bulldog reports were “based on inaccurate information and a poorly written and innaccurate [sic] FBI/EC.” Complaint Exhibit 1 at 106-07. Again, the Report cited an undisclosed “Memorandum for the Record, April 30, 2014.” Complaint Exhibit 1 at 106 n. 356.

34. In essence, the Meese Report reiterated and emphatically embellished the public statements that the FBI had made immediately following the Bulldog’s publication of its initial article about the FBI’s Sarasota investigation, but it did not identify the author of the April 16, 2002, FBI Report or explain either how the author could have made such a serious error, or recite any evidence to negate the contrary evidence compiled by the Bulldog during its own Sarasota investigation. Complaint Exhibit 1 at 106.

35. The Meese Commission Report made no mention of the FDLE documents which showed that the FBI had interviewed Wissam Taysir Hamoud in 2004 and that Hamoud had claimed that al-Hijji had said Osama bin Laden was his hero, had tried to recruit Hamoud to fight in Afghanistan, and had introduced him to a senior al Qaeda leader.

36. In order to attempt to understand the basis for the Meese Report’s conclusory attacks on the April 16, 2002, FBI Report, the Bulldog sent a FOIA request, Complaint Exhibit 3, to the FBI on April 8, 2015. It sought transcripts of Commission proceedings, Memoranda for the Record, personal service contracts, drafts of the final report, FBI briefings and summaries given to the Commission, and the Sarasota family case file reviewed by the Commission. This FOIA request will be referred to as Request 1.

37. The FBI violated 5 U.S.C. § 552(a)(6) by failing to produce the requested records

by the May 6, 2015, statutory deadline.

38. On May 19, 2015, the FBI advised the Bulldog, Complaint Exhibit 5, that it had determined that “unusual circumstances” applied to the processing of Request 1.

39. The Bulldog then propounded a second FOIA request, Complaint Exhibit 6, on July 4, 2015, seeking a narrower set of Meese Commission records. This will be referred to as Request 2.

40. In violation of FOIA, the FBI failed to produce the records sought by Request 2.

41. On July 4, 2015, the Bulldog also sent a further FOIA request to the FBI for all documents regarding any disciplinary action taken against the agent who prepared the April 16, 2002, FBI report that had been criticized by the Meese Commission. Complaint Exhibit 8. This will be referred to as Request 3.

42. In making Request 3, the Bulldog hoped to establish whether the FBI had taken disciplinary action against the agent who authored the April 16, 2002, report, so that if it had not taken any such action, this would call into question the legitimacy of the Commission’s criticism of the April 16, 2002, report.

43. On July 15, 2015, the FBI refused to confirm or deny the existence of any records responsive to Request 3. Complaint Exhibit 9.

44. Plaintiffs filed this lawsuit on June 15, 2016, to challenge the FBI’s failure to produce records responsive to Requests 1, 2 and 3.

45. More than two months later, on October 31, 2016, the FBI announced that it had located 220 pages of records responsive to Request 2, and released redacted portions of those pages, citing many FOIA exemptions to justify the redactions. DE-27-2 at Ex. K. The records included a memo reflecting an April 30, 2014, briefing of the Meese Commission regarding the

April 16, 2002, FBI Report, DE-27-2 at 37-40; an October 24, 2014, briefing of one Meese Commissioner regarding “Additional Evidence Regarding 9/11 Attacks”; DE-27-2 at 41-42; 1 November 10, 2014, briefing of two Meese commissioners, DE-27-1 at 43-44; an October 5, 2012 report regarding the status of the FBI’s continuing 9/11 investigation, DE-27-2 at 45-48; and personal service contracts of two of the Meese commissioners (only two-pages of the contract of Meese himself were produced) and some staff members. DE-27-2 at 49-257.

46. On November 21, 2016, the FBI withdrew its refusal to respond to Request 3 relating to discipline of the agent who wrote the April 16, 2002, FBI Report, and substituted a new response stating that it had “conducted a search of the Central Records System. We were unable to identify any records responsive to the FOIA [request].” The FBI did not indicate whether it had asked the agent who was the subject of the possible discipline whether he had received records showing discipline.

47. On December 30, 2016, the FBI produced still more records, this time an 80-page transcript of the March 25, 2015, press conference held by the Meese Commission announcing release of its report, Broward Bulldog 231-310; duplicate copies of four pages released on October 31, 2016, Broward Bulldog 221-24; the original Bulldog article from September 8, 2011, Broward Bulldog 225-28; and an undated FBI Report, Broward Bulldog 229-30.

48. The FBI filed a summary judgment motion on December 30, 2016, supported by declarations of David M. Hardy, Angie E. Cecil, and Mary E. Wilson. None explained how in April 16, 2002, an FBI agent could have erred in finding “many connections” between the Sarasota Saudi family and the 9/11 hijackers, why that finding did not result in a further comprehensive investigation, as requested by the author of the report, of the family or other evidence of Saudi government support for the hijackers who attacked the United States, or the

prosecution of anyone in connection with the more than 3,000 murders that took place on September 11, 2001.

49. All of the records released by the FBI to date appear to show that the FBI did, in fact, discover evidence that the Saudi government provided material support to the 9/11 hijackers and that the FBI is withholding the most significant aspects of that evidence in violation of FOIA either to protect the relationship of the United States with Saudi Arabia, to conceal its own misfeasance in investigating the 9/11 attacks, or for some other reason not permitted by FOIA.

50. Some of the documents released showed FBI agents investigating 9/11 failed to obtain security records from the Prestancia gated subdivision that might have evidence that the hijackers had visited the residence of a Saudi family with ties to the royal family. DE-27-2 at 39.

51. The FBI redacted Meese Commission personal service contracts to remove information about how much it paid the Review Commission's three members and staff. *E.g.*, DE-27-2 at 55, 104, 123-24, 145, 163, 169, 187, 211, 217, 234. This information would be relevant to evaluating the independence and reliability of the Commission.

52. Another record released recounts a Meese Commission briefing by FBI agents titled, "Overview of Additional Evidence Regarding the 9/11 Attacks." "It was explained that in preparation for trials of individuals held at Guantanamo Bay, Cuba, the FBI has gone back to review evidence/information already in hand to see if additional evidence can be found for the prosecutions of these individuals."

53. Most of the remainder of that two-page report was censored for national security and other reasons, except for this sentence: "None of this identifies new participants in the 9/11 attacks but hardens the existing known connections to the plot."

54. Another of the released records, DE-27-1 at 45-48, shows under the heading

“Updates and Initiatives (as of 5 October 2012),” that the FBI found in San Diego a Saudi support network for two of the 9/11 suicide hijackers, Nawaf al-Hazmi and Khalid al-Mihdhar, who with three other terrorists crashed American Airlines Flight 77 into the Pentagon.

55. The FBI redacted much of this 2012 FBI Report which is emblazoned with a logo depicting the Twin World Trade Center Towers destroyed on September 11, 2001, and the Pentagon. The FBI redacted even the title of the report in reliance on 5 U.S.C. § 552(b)(1), which allows withholding of records “in the interest of national defense or foreign policy.”

56. Unredacted information in the 2012 FBI Report states Fahad-al-Thumairy, a Saudi diplomat and imam at Los Angeles’ King Fahd Mosque, “immediately assigned an individual to take care of [two soon-to-be-hijackers] during their time in Los Angeles.” DE-27-2 at 47-48.

57. It also states Omar al-Bayoumi was a salaried employee of the Kingdom of Saudi Arabia who befriended the two hijackers in San Diego. DE-27-2 at 48.

58. The FBI redacted the name of a third subject, but stated that person “tasked al-Thumairy and al-Bayoumi with assisting the hijackers.” DE-27-2 at 48.

59. The four-page report goes on to say that the trio “provided (or directed others to provide) the hijackers with assistance in daily activities, including procuring living quarters, financial assistance, and assistance in obtaining flight lessons and driver’s licenses. [Redacted] seeks to prove these subjects provided such assistance with the knowledge that [the hijackers] were here to commit an act of terrorism.” DE-27-2 at 48.

60. These records and others show that the FBI has evidence of Saudi government complicity in the 9/11 attacks, that the FBI continued to investigate that evidence for years afterwards, but still has taken no action to expose through criminal charges or otherwise the

existence of a Saudi-government network that supported the September 11, 2001 attacks.

61. It has now been more than 15 years since September 11, 2001, and not a single person, to the best of my knowledge, has been prosecuted in U.S. criminal courts for providing assistance to the hijackers. The FBI also has provided no credible indication that anyone ever will be prosecuted for assisting the hijackers.

62. Under these circumstances, it seems highly improbable that disclosure of evidence gathered by the FBI concerning the 9/11 attacks, including the information redacted from the released records, could harm national security, law enforcement efforts, or the personal privacy of either the subjects of the 9/11 investigation or those who conducted the investigation.

63. At the same time, public interest in understanding whether the government of Saudi Arabia supported attacks on the United States, and whether the FBI turned a blind eye to this evidence or failed to act on this evidence, remains exceptionally high.

64. The Bulldog commenced this lawsuit and the prior lawsuit before Judge Zloch because of the extraordinary public interest in these issues. The interest was of global and national dimension. Local interest also is intense because so many of the 9/11 hijackers lived and trained in Florida, and because of the concern that additional attacks may still be coming. Indeed, Florida and other areas in the United States already have been subjected to further terrorist attacks, yet basic questions regarding the 9/11 attacks remain unanswered.

65. The Bulldog asked the FBI on June 10, 2013, to declassify that part of a report that the U.S. House and U.S. Senate Intelligence Committees jointly authored in 2002 regarding the possibility that the Saudi government had provided support for the hijackers. This material frequently has been referred to in the media as the 28 Pages.

66. Sen. Graham served as co-chair of the Joint Inquiry and he personally had urged

the Bulldog to seek declassification of the 28 Pages so that the American public would have access to more evidence nearing on whether Saudi Arabia had sponsored the attacks on the United States.

67. Although the FBI and the Justice Department refused the Bulldog's declassification request, President Barack Obama and the U.S. Congress ultimately did declassify much of that material on July 15, 2016, and, at the Bulldog's request, the Interagency Security Classification Appeals Panel released substantial parts of the report on December 30, 2016, effectively overruling the FBI's refusal to declassify that document.

68. At the time of that declassification, the Director of National Intelligence released a statement that the "Executive Branch" of the U.S. Government, "after careful consideration by the relevant Departments and agencies," "determined that the harm to national security by releasing portions of Part Four of the report at this time is outweighed by the public interest in additional transparency concerning the Committees' findings." A copy of this statement is attached as Exhibit I.

69. The Director of National Intelligence stated that the "newly released portion of Part Four relates to the Joint Inquiry's finding that '[w]hile in the United States, some of the September 11 hijackers were in contact with, and received support or assistance from, individuals who may be connected to the Saudi Government.'"

70. Also on July 15, 2016, the Director of National Intelligence released a declassified executive summary of a 2005 joint CIA-FBI memorandum prepared in response to a congressional directive to assess "the nature and extent of Saudi Government support of terrorism." That declassified summary, Exhibit J, concluded that "There is evidence that official Saudi entities, . . . and associated nongovernmental organizations (NGOs), provide financial and

logistical support to individuals in the United States and around the world, some of whom are associated with terrorism-related activity.” It further stated that “The Saudi Government and many of its agencies have been infiltrated and exploited by individuals associated with or sympathetic to al-Qa’ida.”

71. All this supports the Bulldog’s conclusion that the FBI found evidence that the Saudi government supported the September 11 attacks on the United States, but has failed to act on the evidence. Members of the public, including the families of the nearly 3,000 victims of the attacks, now deserve to see that evidence so they can decide for themselves the significance of it and whether their government responded appropriately to it. They also deserve to see all aspects of the records of the Meese Commission. The Freedom of Information Act requires nothing less.

Executed in Broward County, Florida, on January 10, 2017.

s/ Dan Christensen
Dan Christensen