

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

.....X
AMERICAN CIVIL LIBERTIES UNION and
THE AMERICAN CIVIL LIBERTIES UNION
FOUNDATION,

Plaintiffs,

v.

15 Civ. 9317 (AKH)

DEPARTMENT OF DEFENSE,
DEPARTMENT OF JUSTICE, including its
components the OFFICE OF LEGAL COUNSEL
and OFFICE OF INFORMATION POLICY,
DEPARTMENT OF STATE, and CENTRAL
INTELLIGENCE AGENCY,

Defendants.

.....X

DECLARATION OF ELIZABETH TULIS

Elizabeth Tulis, pursuant to the provisions of 28 U.S.C. § 1746, declares, under penalty of perjury, as follows:

1. I am an Assistant United States Attorney in the office of Preet Bharara, United States Attorney for the Southern District of New York, attorney for the Defendants in this case. I am an attorney assigned to the defense of this matter.
2. I submit this declaration in support of Defendants’ motion for summary judgment.
3. Attached hereto as Exhibit A is a copy of the redacted document designated “Doc. No. 4” in the CIA’s *Vaughn* index. Exhibit A consists of the redacted version of Doc. No. 4 that was produced to Plaintiffs.
4. Attached hereto as Exhibit B is a copy of the redacted document designated “Doc. No. 6” in the CIA’s *Vaughn* index. Exhibit B consists of the redacted version of Doc. No. 6 that was produced to Plaintiffs.

5. Attached hereto as Exhibit C is a copy of the redacted document designated “Doc. No. 7” in the CIA’s *Vaughn* index. Exhibit C consists of the redacted version of Doc. No. 7 that was produced to Plaintiffs.

6. Attached hereto as Exhibit D is a copy of the redacted document designated “Doc. No. 8” in the CIA’s *Vaughn* index. Exhibit D consists of the redacted version of Doc. No. 8 that was produced to Plaintiffs.

7. Attached hereto as Exhibit E is a copy of the redacted document designated “Doc. No. 9” in the CIA’s *Vaughn* index. Exhibit E consists of the redacted version of Doc. No. 9 that was produced to Plaintiffs.

8. Attached hereto as Exhibit F is a copy of the redacted document designated “Doc. No. 10” in the CIA’s *Vaughn* index. Exhibit F consists of the redacted version of Doc. No. 10 that was produced to Plaintiffs.

9. Attached hereto as Exhibit G is a copy of the redacted document designated “Doc. No. 13” in the CIA’s *Vaughn* index. Exhibit G consists of the redacted version of Doc. No. 13 that was produced to Plaintiffs.

10. Attached hereto as Exhibit H is a copy of the redacted document designated “Doc. No. 14” in the CIA’s *Vaughn* index. Exhibit H consists of the redacted version of Doc. No. 14 that was produced to Plaintiffs.

11. Attached hereto as Exhibit I is a copy of the redacted document designated “Doc. No. 15” in the CIA’s *Vaughn* index. Exhibit I consists of the redacted version of Doc. No. 15 that was produced to Plaintiffs.

12. Attached hereto as Exhibit J is a copy of the redacted document designated “Doc. No.

18” in the CIA’s *Vaughn* index. Exhibit J consists of the redacted version of Doc. No. 18 that was produced to Plaintiffs.

13. Attached hereto as Exhibit K is a copy of the redacted document designated “Doc. No. 19” in the CIA’s *Vaughn* index. Exhibit K consists of the redacted version of Doc. No. 19 that was produced to Plaintiffs.

14. Attached hereto as Exhibit L is a copy of the redacted document designated “Doc. No. 28” in the CIA’s *Vaughn* index. Exhibit L consists of the redacted version of Doc. No. 28 that was produced to Plaintiffs.

15. Attached hereto as Exhibit M is a copy of the redacted document designated “Doc. No. 29” in the CIA’s *Vaughn* index. Exhibit M consists of the redacted version of Doc. No. 29 that was produced to Plaintiffs.

16. Attached hereto as Exhibit N is a copy of the redacted document designated “Doc. No. 37” in the CIA’s *Vaughn* index. Exhibit N consists of the redacted version of Doc. No. 37 that was produced to Plaintiffs.

17. Attached hereto as Exhibit O is a copy of the redacted document designated “Doc. No. 43” in the CIA’s *Vaughn* index. Exhibit O consists of the redacted version of Doc. No. 43 that was produced to Plaintiffs.

18. Attached hereto as Exhibit P is a copy of the redacted document designated “Doc. No. 44” in the CIA’s *Vaughn* index. Exhibit P consists of the redacted version of Doc. No. 44 that was produced to Plaintiffs.

19. Attached hereto as Exhibit Q is a copy of the redacted document designated “Doc. No. 45” in the CIA’s *Vaughn* index. Exhibit Q consists of the redacted version of Doc. No. 45 that

was produced to Plaintiffs.

20. Attached hereto as Exhibit R is a copy of the redacted document designated “Doc. No. 46” in the CIA’s *Vaughn* index. Exhibit R consists of the redacted version of Doc. No. 46 that was produced to Plaintiffs.

21. Attached hereto as Exhibit S is a copy of the redacted document designated “Doc. No. 55” in the CIA’s *Vaughn* index. Exhibit S consists of the redacted version of Doc. No. 55 that was produced to Plaintiffs.

22. Attached hereto as Exhibit T is a copy of the redacted document designated “Doc. No. 66” in the CIA’s *Vaughn* index. Exhibit T consists of the redacted version of Doc. No. 66 that was produced to Plaintiffs.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
January 6, 2017

/s/ Elizabeth Tulis
ELIZABETH TULIS
Assistant United States Attorney