

## **Exhibit 2**

Stonehill 1979 and 1999 FOIA Request

## **Exhibit 2(a)**

**Stonehill October 19, 1979 FOIA to Criminal Division**

RECEIVED

OCT 25 2 38 PM '79

FREEDOM OF INFORMATION  
PRIVACY UNIT  
CRIMINAL DIVISION

Industrial Investments Inc.  
Suite 804,  
Dusit Thani Office Building,  
946 Rama IV Road, Saladaeng Circle,  
Bangkok, Thailand.

19th October, 1979.

Mr. E. Ross Buckley,  
Criminal Division,  
Department of Justice,  
Washington, DC 20530.  
U.S.A.

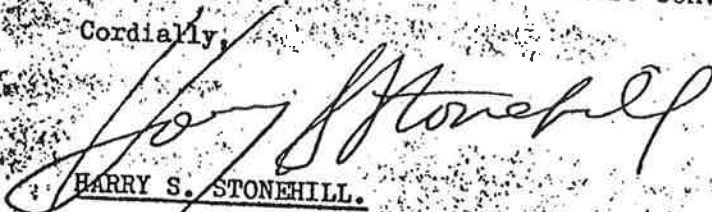
Dear Attorney Buckley,

Attached herewith please find my Privacy Act identification and request form No. 4072, as well as the records and the various departments which I should like to have checked for information.

Would you kindly forward this data to me by airmail and in view of the distances involved, and I refer to your folder No. PA/-CRM-4072.

May I hear from you at your earliest convenience.

Cordially,

  
HARRY S. STONEHILL.

Encs.

1319

PRIVACY ACT IDENTIFICATION AND REQUEST FORM

FILE NO. 4672

TO: ASSISTANT ATTORNEY GENERAL  
CRIMINAL DIVISION  
DEPARTMENT OF JUSTICE  
WASHINGTON, D.C. 20530

DATE:

ATTENTION: FOI/PRIVACY ACT UNIT

Dear Sir:

Request is hereby made for access to records or information pertaining to me in the system(s) of records indicated on the attached list.

The following information is supplied to you pursuant to Department of Justice Regulations (28 C.F.R. 16.41) in order to identify myself and to assist in locating my records:

1. FULL NAME (Please print):

STONEHILL HARRY SOLOMON  
(LAST) (FIRST) (MIDDLE IN FULL)

2. Date of Birth: 9/15/17 Place of Birth: ST. LOUIS MO. USA

3. Present address: INDUSTRIAL INVESTMENTS INC

4. Prior addresses: DUSIT THANI OFFICE BLDG  
946 RAMA IV ROAD  
BANGKOK THAILAND

5. The approximate year or years during which you believe a record about you may have been created: 1955 UNTIL 197

6. The judicial district(s) or state(s) where the events occurred about which you believe a record may have been created: MANILA PHILIPPINES

7. If married, or divorced or separated, the full name of your spouse (if wife, include maiden name): LOURDES BLANCO STONCH.

8. If the record you believe to exist about you includes arrest, trial, or conviction records:

(a) The date of arrest, indictment or complaint against you: 1962, 1965

(b) Approximate date of conviction: \_\_\_\_\_

(c) Federal court and district in which trial or proceeding took place: \_\_\_\_\_

(d) Federal offense(s) involved: NEW YORK CITY FEDERAL COUR.  
1. VIOLATION BILL OF LADING  
2. IRS TAX CASE

(e) Names of codefendants (if any): ROBERT P. BROOKS

1319

Sincerely,



9. (Signature):

CRIMINAL DIVISION  
SYSTEM OF RECORDS

REQUESTER'S NAME Stonehill  
PA/CRM NO. 4072

✓ JUSTICE/CRM - 001 Central Criminal Division Index File and Associated Records

This system contains information on persons referred to in potential or actual cases and matters of concern to the Criminal Division and correspondents on subjects directed or referred to the Criminal Division. This system also contains records which were maintained by the former Internal Security Division (now a Section of the Criminal Division).

\_\_\_\_\_ JUSTICE/CRM - 002 Criminal Division Witness Security File

This system contains information on persons who are potential or actual witnesses and/or informants for whom federal protection has been considered or authorized. This system also contains information concerning relatives and associates of those individuals.

✓ \_\_\_\_\_ JUSTICE/CRM - 003 File of Names Checked to Determine if Those Individuals have been the Subject of an Electronic Surveillance

This system contains information concerning grand jury witnesses, defendants, and potential defendants in criminal cases and their attorneys whose names have been submitted in response to, or anticipation of, discovery motions, to inquire whether they have ever been the subjects of electronic surveillance.

✓ \_\_\_\_\_ JUSTICE/CRM - 004 General Litigation and Legal Advice Section, Criminal Division, Central Index File and Associated Records

This system contains information on persons referred to in potential or actual cases and matters of concern to the General Litigation and Legal Advice Section, Criminal Division, and correspondents on subjects directed or referred to the Criminal Division.

✓ \_\_\_\_\_ JUSTICE/CRM - 006 Information File on Individuals and Commercial Entities Known or Suspected of Being Involved in Fraudulent Activities

This system contains information on individuals involved in actual or suspected fraudulent activities and their victims.

✓ \_\_\_\_\_ JUSTICE/CRM - 009 Narcotic and Dangerous Drug Witness Security Program File

This system contains information on persons who are potential or actual witnesses and/or informants for whom federal prosecution has been considered or authorized in narcotic and dangerous drug cases. This system also contains information concerning relatives and associates of those individuals.

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✓ JUSTICE/CRM - 012 Organized Crime and Racketeering Section, General Index File and Associated Records

This system consists of the records of the various field offices, and contains information on persons who have been prosecuted or are under investigation for potential or actual criminal prosecution as well as persons allegedly involved in organized criminal activity and those alleged to be associated with the subject. (See list of field offices on page 4 ).

✓ JUSTICE/CRM - 014 Organized Crime and Racketeering Section, Intelligence and Special Services Unit, Information Request System

This system contains information on individuals making inquiries of the Intelligence and Special Services Unit data sources, Unit personnel processing those inquiries, Intelligence Analysts assigned to the Field Offices, and those individuals about whom such inquiries are made.

\_\_\_\_\_ JUSTICE/CRM - 016 Records on Persons who have Outstanding and Uncollected Federal Criminal Fines or Federal Bond Forfeitures

This system contains information on persons who have outstanding and uncollected federal criminal fines or federal bond forfeitures whose address is presently unknown or was, at one time, unknown.

\_\_\_\_\_ JUSTICE/CRM - 017 Registration and Propaganda Files Under the Foreign Agents Registration Act of 1938, as amended

This system contains the statement of the registrant and other documents filed under the Foreign Agents Registration Act of 1938, 22 U.S.C. 611 et seq.

\_\_\_\_\_ JUSTICE/CRM - 018 Registration of Files of Individuals who have Knowledge of, or have Received Instruction or Assignment in Espionage, Counterespionage, or Sabotage Service or Tactics of a Foreign Government or of a Foreign Political Party

This system contains the statement of the registrant and other documents filed under 50 U.S.C. 851.

✓ \_\_\_\_\_ JUSTICE/CRM - 019 Requests to the Attorney General for Approval of Applications to Federal Judges for Electronic Interceptions,

This system contains information on individuals who have been the subject of requests by federal investigative agencies for electronic surveillance.

- 3 -

✓ JUSTICE/CRM - 020 Requests to the Attorney General for Approval of Applications to Federal Judges for Electronic Interceptions in Narcotic and Dangerous Drug Cases

This system contains information on individuals who have been the subject of requests by federal investigative agencies for electronic surveillance in narcotic and dangerous drug cases.

✓ JUSTICE/CRM - 021 The Stocks and Intelligence Control Card File System

This system contains information on individuals, and their known associates, who are actual, potential, or alleged violators, of statutes dealing with stocks, bonds, and other securities.

\_\_\_\_ JUSTICE/CRM - 022 Witness Immunity Records

This system contains information on potential or actual witnesses for whom immunity (pursuant to 18 U.S.C. 6001-6004 and 18 U.S.C. 2514) is proposed.

\_\_\_\_ JUSTICE/CRM - 024 Freedom of Information/Privacy Act Records

This system contains copies of correspondence and internal memoranda related to Freedom of Information and Privacy Act requests received by the Criminal Division and related records necessary to the processing of such requests; files are arranged alphabetically under the name of the requester.

NOTE: In the event you check the system of records designated as Justice/CRM - 024, we will deem your request to be only for documents pertaining to the processing of requests prior to your present request.

✓ JUSTICE/CRM - 025 Tax Disclosure Index File and Associated Records

This system contains information concerning taxpayers about whom Criminal Division has requested and/or obtained disclosure of tax material from the Internal Revenue Service pursuant to 26 U.S.C. §6103, on or after January 1, 1977.

- 4 -

NOTE: In the event you have checked the system of records designated as JUSTICE/CRM - 012, please indicate which of the following Organized Crime and Racketeering Section Field Office and/or Branch Office records you wish searched.

<input type="checkbox"/> BOSTON, MA	<input checked="" type="checkbox"/> MIAMI, FL
* <input type="checkbox"/> Hartford, CT	* <input type="checkbox"/> Atlanta, GA
* <input type="checkbox"/> Providence, RI	* <input type="checkbox"/> San Juan, PR
<input type="checkbox"/> BROOKLYN, NY	* <input type="checkbox"/> Tampa, FL
<input type="checkbox"/> BUFFALO, NY	<input type="checkbox"/> NEWARK, NJ
* <input type="checkbox"/> Rochester, NY	* <input type="checkbox"/> Camden, NJ
<input checked="" type="checkbox"/> CHICAGO, IL	<input type="checkbox"/> NEW ORLEANS, LA
<input type="checkbox"/> CLEVELAND, OH	<input type="checkbox"/> PHILADELPHIA, PA
<input type="checkbox"/> DALLAS, TX	<input checked="" type="checkbox"/> SAN FRANCISCO, CA
<input type="checkbox"/> DETROIT, MI	* <input checked="" type="checkbox"/> Honolulu, HA
<input type="checkbox"/> KANSAS CITY, MO	<input type="checkbox"/> SYRACUSE, NY
<input checked="" type="checkbox"/> LOS ANGELES, CA	<input checked="" type="checkbox"/> WASHINGTON, DC
* <input checked="" type="checkbox"/> Las Vegas, NV	
* <input type="checkbox"/> Phoenix, AZ	

\* BRANCH OFFICE

NOTE: The systems of records described on pages 1-4 above, and/or records contained in those systems may be exempt from one or more of the provisions of the Privacy Act pursuant to subsection (j) or (k), in accordance with the Exemption Notices for Systems of Records as same are published in the Federal Register from time to time. This request to you to indicate the system of systems of records you wish searched does not constitute a waiver by the Department of Justice of any valid exemption.



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NOTE: THE FOLLOWING SYSTEMS OF RECORDS CONTAIN ONLY THE NAMES OF, OR INFORMATION CONCERNING CURRENT OR PAST EMPLOYEES OF THE CRIMINAL DIVISION OF THE DEPARTMENT OF JUSTICE

A search of these systems will not be conducted unless you indicate that you are, or were, so employed, and the inclusive dates of such employment.

\_\_\_\_ JUSTICE/CRM - 005 Index to Names of Attorneys Employed by the U.S. Department of Justice, Indicating the Subject of the Memoranda on Criminal Matters They Have Written

This system is indexed under the names of past and present attorneys employed by the Criminal Division, U.S. Department of Justice, who have written legal memoranda, and lists the topic discussed.

\_\_\_\_ JUSTICE/CRM - 007 Name Card File on Criminal Division Personnel Authorized to have Access to the Central Criminal Division Records

This system contains the names of current personnel of the Criminal Division, generally attorneys, authorized to have access to the central records of the Division.

\_\_\_\_ JUSTICE/CRM - 008 Name Card File on Department of Justice Personnel Authorized to have Access to Classified Files of the Department of Justice

This system contains the names of current personnel of the Department of Justice, generally attorneys, authorized to have access to records classified as Confidential, Secret and Top Secret.

\_\_\_\_ JUSTICE/CRM - 023 Weekly Statistical Report

This system contains the names and statistics on time expended by past or present attorneys of the Criminal Division.

1319

## **Exhibit 2-b**

September 30,1985 letter to Hans Nathan from Deputy Assistant Attorney General  
Roger Olsen



U.S. Department of Justice

Tax Division

Office of the Deputy Assistant Attorney General  
RMO:PJones:pj  
FOIPA/TAX #1319

Washington, D.C. 20530

30 SEP 1985

CERTIFIED # 90155  
RETURN RECEIPT REQUESTED

Hans A. Nathan, Esquire  
Trammel, Rand, Nathan  
and Lincoln, P.C.  
1000 Potomac Street, N.W.  
Suite 302  
Washington, D.C. 20007

Dear Mr. Nathan:

In response to Harry S. Stonehill's Privacy Act request dated October 19, 1979, the Criminal Division of the Department of Justice referred his request to the Tax Division for processing. This referral was received by the Tax Division's Information and Privacy Unit on November 1, 1979.

Pursuant to 28 C.F.R. § 16.93, a regulation promulgated pursuant to subsections (j) and (k) of the Privacy Act, 5 U.S.C. § 552a, Tax Division systems of records have been exempted from the access provisions of the Privacy Act. His request, however, has been processed under the standards of the Freedom of Information Act, 5 U.S.C. § 552. A search of the indices to the files of the Tax Division was conducted, and four (4) files responsive to his request were located. We have determined that one thousand one hundred forty-five (1,145) documents are releasable in their entireties.

Pursuant to 28 C.F.R. § 16.4, we have referred documents to the following components of the Department of Justice and other federal agencies and you may expect to receive a direct response from them:

Civil Division  
Criminal Division  
Executive Office for U. S. Attorneys  
Office of Information and Privacy  
Address: U. S. Department of Justice  
10th Street and Constitution Avenue, N.W.  
Washington, D. C. 20530

*u*

*Admin*

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Immigration and Naturalization Service

Address: 425 Eye Street N.W.  
Washington, D. C. 20536

Federal Bureau of Investigation

Address: 9th Street and Pennsylvania Avenue, N.W.  
Washington, D. C. 20535

State Department

Address: 2201 C Street, N.W.  
Washington, D. C. 20520

Portions of one hundred fifty-one (151) documents have been withheld and one hundred three (103) have been withheld in their entireties. This material is exempt from disclosure pursuant to the exemptions set forth in subsections (b) (3), (b) (5), (b) (7) (C) and (b) (7) (D) of the Freedom of Information Act. A portion of one document is being withheld pursuant to a Court Order, prohibiting its release. Exemption 3, in conjunction with 26 U.S.C. § 6103, has been applied to material reflecting confidential tax return information of third parties. Exemption 5 has been applied to material which is predecisional in nature reflecting the give and take of the Government's consultative process. Release of portions of some documents would constitute an unwarranted invasion of the personal privacy of third parties, and Exemption 7(C) has been applied to this material. Finally, Exemption 7(D) has been applied to portions of some documents to protect the identity of confidential sources.

Pursuant to 28 C.F.R. § 16.10(b) (1), the cost of providing you the enclosed documents has been computed at a rate of \$.10 per page. The material to which you have been granted access comprises two thousand eighty-nine (2,089) pages, for a total cost of \$208.90. Please make your check or money order payable to the "Treasury of the United States" and forward it to: U. S. Department of Justice, Tax Division, Information and Privacy Unit, 10th Street and Constitution Avenue, N.W., Washington, D. C. 20530.

In accordance with 28 C.F.R. § 16.8, your client may appeal our determination within thirty (30) working days of your receipt of this letter by writing to the Attorney General. The appeal letter and envelope should be marked "Freedom of Information Appeal" and should be addressed to the Office of Information and Privacy, U. S. Department of Justice, 10th Street and Constitution Avenue, N.W., Washington, D. C. 20530. Thereafter, judicial review of our determination, if upheld by the Assistant Attorney General, Office of Legal Policy, will be available in the District Court of the United States in the district in which your client resides or has his principal

- 3 -

place of business, in the district in which the agency records are located or in the District of Columbia.

Sincerely yours,

**SIGNED**

ROGER M. OLSEN  
Deputy Assistant Attorney General  
Tax Division

Enclosures (1,296)



PENALTY FOR PRIVATE USE, \$300

UNITED STATES POSTAL SERVICE  
OFFICIAL BUSINESS

**SENDER INSTRUCTIONS**  
Print your name, address, and ZIP Code in the space below.  
• Complete items 1, 2, 3, and 4 on the reverse.  
• Attach to front of article if space permits, otherwise affix to back of article.  
• Enclose article "Return Receipt Requested" adjacent to number.

RETURN TO  
Office of the Ass't Atty. General Tax Div.  
Department of Justice

FOIPA Unit-Rm. 107 Star

414 11th St., Apt. 500, P.O. Box or R.D. No.

Washington, D.C. 20530

(City, State, and ZIP Code)



PENALTY FOR PRIVATE USE, \$300

UNITED STATES POSTAL SERVICE  
OFFICIAL BUSINESS

**SENDER INSTRUCTIONS**  
Print your name, address, and ZIP Code in the space below.  
• Complete items 1, 2, 3, and 4 on the reverse.  
• Attach to front of article if space permits, otherwise affix to back of article.  
• Enclose article "Return Receipt Requested" adjacent to number.

RETURN TO  
Office of the Ass't Atty. General Tax Div.  
Department of Justice

FOIPA Unit-Rm. 107 Star

414 11th St., Apt. 500, P.O. Box or R.D. No.

Washington, D.C. 20530

(City, State, and ZIP Code)



PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE \$300

UNITED STATES POSTAL SERVICE  
OFFICIAL BUSINESS

**SENDER INSTRUCTIONS**  
Print your name, address, and ZIP Code in the space below.  
• Complete items 1, 2, and 3 on the reverse.  
• Attach to front of article if space permits, otherwise affix to back of article.  
• Enclose article "Return Receipt Requested" adjacent to number.

RETURN TO

Office of the Assistant  
Attorney General, Tax Division  
Department of Justice  
FOIPA Unit - Room 107 Star  
1114 3rd Eleventh St. N. W.  
Washington, D.C. 20530



PENALTY FOR PRIVATE USE, \$300

UNITED STATES POSTAL SERVICE  
OFFICIAL BUSINESS

**SENDER INSTRUCTIONS**  
Print your name, address, and ZIP Code in the space below.  
• Complete items 1, 2, 3, and 4 on the reverse.  
• Attach to front of article if space permits, otherwise affix to back of article.  
• Enclose article "Return Receipt Requested" adjacent to number.

RETURN TO  
Office of the Ass't Atty. General Tax Div.  
Department of Justice

FOIPA Unit-Rm. 107 Star

414 11th St., Apt. 500, P.O. Box or R.D. No.

Washington, D.C. 20530

(City, State, and ZIP Code)

PS Form 3811, July 1983 447-948

**SENDER: Complete items 1, 2, and 3.**  
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)  
 Show to whom and date delivered.  
 Show to whom, date and address of delivery.  
 RESTRICTED DELIVERY  
 Show to whom and date delivered.  
 RESTRICTED DELIVERY.  
 Show to whom, date, and address of delivery.

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: Suite 302  
 Hans A. Nathan, Esquire  
 1000 Potomac Street, N.W.  
 Washington, D.C. 20007

3. ARTICLE DESCRIPTION:  
 REGISTERED NO. CERTIFIED NO. INSURED NO.  
 90154 901

(Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE  Addressee  Authorized agent  
 D. Cheron

4. DATE OF DELIVERY: 1/13/87 POSTMARK

5. ADDRESS (Complete only if requested)  
 1000 Potomac

6. UNABLE TO DELIVER BECAUSE: GLPFRK'S INITIALS

★GPO : 1979-300-488

PA # 1319  
 384  
 PJ  
 Stoville  
 DC

PS Form 3811, July 1983 447-948

**SENDER: Complete items 1, 2, 3 and 4.**  
Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1.  Show to whom, date and address of delivery.  
 2.  Restricted Delivery.

3. Article Addressed to:  
 Hans A. Nathan, Esquire  
 1000 Potomac Street, N.W.  
 Suite 302  
 Washington, D. C. 20007

4. Type of Service: Article Number  
 Registered  Insured  
 Certified  COD 90125  
 Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Addressee  
 X D. Cheron

6. Signature - Agent  
 X

7. Date of Delivery  
 1/13/87

8. Addressee's Address (ONLY if requested and fee paid)  
 1000 Potomac

1319  
 DC  
 Stoville  
 384

PS Form 3811, July 1983 447-948

**SENDER: Complete items 1, 2, 3 and 4.**  
Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1.  Show to whom, date and address of delivery.  
 2.  Restricted Delivery.

3. Article Addressed to:  
 Hans A. Nathan, Esquire  
 1000 Potomac Street, N.W.  
 Suite 302  
 Washington, D. C. 20007

4. Type of Service: Article Number  
 Registered  Insured  
 Certified  COD 90155  
 Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Addressee  
 X D. Cheron

6. Signature - Agent  
 X

7. Date of Delivery  
 1/13/87

8. Addressee's Address (ONLY if requested and fee paid)  
 1000 Potomac

1319  
 DC  
 Stoville  
 384

PS Form 3811, July 1983 447-948

**SENDER: Complete items 1, 2, 3 and 4.**  
Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1.  Show to whom, date and address of delivery.  
 2.  Restricted Delivery.

3. Article Addressed to:  
 Hans A. Nathan, Esquire  
 1000 Potomac Street, N.W.  
 Suite 302  
 Washington, D. C. 20007

4. Type of Service: Article Number  
 Registered  Insured  
 Certified  COD 90124  
 Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Addressee  
 X D. Cheron

6. Signature - Agent  
 X

7. Date of Delivery  
 1/13/87

8. Addressee's Address (ONLY if requested and fee paid)  
 1000 Potomac

1319  
 DC  
 Stoville  
 384

## **Exhibit 2(c)**

**January 6, 1999 letter from S. Flesner to R. Hegegstad**





DEPARTMENT OF THE TREASURY  
INTERNAL REVENUE SERVICE  
950 L'ENFANT PLAZA SOUTH, S.W.  
WASHINGTON, DC 20024

JAN - 6 1999

Robert Heggestad  
Heggestad & Weiss, P.C.  
1320 19<sup>th</sup> Street, NW, Suite 600  
Washington, D.C. 20036

Dear Mr. Heggestad:

This is in response to your letter of January 6, 1999, concerning our response to your Freedom of Information Act request of behalf of your clients, Harry S. Stonehill and Robert P. Brooks.

In an effort to clarify our original response, let me begin by stating that a through review was conducted of the five boxes of records under the jurisdiction of the Assistant Commissioner (International) that relate to your clients. I personally assisted with this review. These boxes contained the Collection Administrative file and documented all efforts to collect U.S. Income taxes assessed against your clients. We reviewed each page to determine if the subject matter related in any way to the list of entities that you provided and the time frame in question. The only documents we located were provided to you in full, with no deletions. There were no other documents under our jurisdiction responsive to your request.

I have reviewed the documents that you attached to your letter. They appear to be declassified documents obtained from the files of another government agency. We did not find copies of those documents in the files we reviewed. We have no knowledge of these documents, nor do we have any knowledge of where they can be located, if they exist. There were no classified documents in the files that we reviewed. The fact that the documents you provided suggest that they were authored by an IRS employee or refer to IRS activity does not provide us with information that would enable us to locate additional records, if they exist, that are not in our possession at this time. I'm sure that you are aware that this case was litigated by the Department of Justice for a number of years. It might be possible that the records in question would be in their files. I would suggest you direct any further correspondence concerning these records to the Department of Justice under a Freedom of Information Act request. Your FOIA request to the Internal Revenue Service dated July 10, 1998 and your letter of January 6, 1999, if directed to DOJ, will probably not meet the specific requirements of the Act. I suggest you resubmit a perfected request to DOJ at this time.

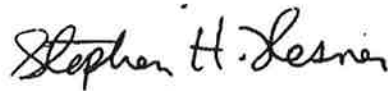
-2-

Enclosed is Notice 393 that explains your appeal rights should you wish to appeal our response.

I do not believe that this office can be of further assistance in your quest for these records.

If you have any questions, I may be contacted at (202) 874-1331 between the hours of 8:00 am and 3:30 pm.

Sincerely,



Stephen H. Flesner  
Disclosure Officer

Enclosure

## **Exhibit 2(d)**

**Stonehill January 8, 1999 FOIA to the Department of Justice**

LAW OFFICES

**HEGGESTAD & WEISS, P.C.**

A PROFESSIONAL CORPORATION  
SUITE 600  
1320 19TH STREET, N.W.  
WASHINGTON, D.C. 20036

Robert E. Heggstad

(202) 289-8333

Facsimile (202) 289-8307

January 8, 1999

Department of Justice  
FOIA/PA Section  
Justice Management Division  
Room 115 LOC  
1111 Constitution Avenue, N.W.  
Washington, D.C. 20530

**Re: Freedom of Information & Privacy Act Request**

Dear FOIA/PA Director:

Pursuant to the Freedom of Information Act, 5 U.S.C. 552, the Privacy Act, 5 U.S.C. 552a, and 28 CFR 16.1 et seq., please consider this a request for a copy of all records, files, hearing transcripts, notes or memoranda of meetings or telephone conversations, and other data in your possession, custody, or control pertaining to Robert P. Brooks, Harry S. Stonehill and United States Tobacco Company including but not limited to:

(1) all documents provided by or related to Menhart Spielman or to Menhart Spielman's meeting on December 18, 1961 with Robert Chandler, Internal Revenue Service representative in Far East, attached to the United States Embassy in the Philippines;

(2) all correspondence between Robert Chandler and Office of International Operations of Washington, D.C. or the U.S. Department of Justice, relating to Menhart Spielman, Harry Stonehill, Robert Brooks or the United States Tobacco Company from January 1960 through January 1965, including but not limited to, January 10, 1962 memorandum from Robert Chandler, Revenue Service Representative, to Office of International Operations, Washington, D.C. and December 1961 memorandum regarding Harry S. Stonehill;

(3) all notes or documents relating to January 9, 1962 meeting between Robert Chandler and Howard L. Parsons, Economic Counselor for the U.S. Embassy in the Philippines;

(4) all documents relating to meetings or telephone conferences or conversations between Robert Chandler and Menhart Spielman and/or Colonel Lukban, Director of the National Bureau of Investigation of the Philippines, between December 1961 and June 1962;

Department of Justice  
FOIA/PA Section  
January 8, 1998  
Page 2

(5) all documents relating to meetings or communications between Robert Chandler and the National Bureau of Investigation regarding the investigation of Harry Stonehill and Robert Brooks and the raids of the United States Tobacco Company which commenced on March 3, 1962.

(6) all notes or correspondence relating to February 11, 1962 meeting arranged by Robert Chandler, between Philippines Secretary of Justice Diakno and Executive Assistant to the Attorney General of the U.S. Robert Kennedy.

As you know, the FOIA requires that even if some material is properly exempt from mandatory disclosure, all segregable portions must be released. If any material covered by this request is withheld, please inform me of the specific exemptions that are being claimed. If material is being released with deletions, I request that each deletion be marked to indicate which exemption(s) is (are) being claimed to authorize each particular withholding. In addition, I ask that your agency exercise its discretion to release information that may be technically exempt but where withholding it would serve no important public interest. Also, please identify the person or persons responsible for the decision declaring an exemption.

My clients, Harry S. Stonehill and Robert P. Brooks, agree to pay any and all reasonable expenses incurred in connection with fulfilling this request.

Original Power of Attorney forms which were been endorsed by Messrs. Stonehill and Brooks (copies of which are attached hereto) were included in the FOIA request to the Department of Defense to which the instant FOIA request is a continuation. As provided under the FOIA, I will expect a reply within ten working days.

If you have any questions regarding the foregoing, please do not hesitate to call.

Very truly yours,

  
Robert E. Heggstad

REH:lmm

**Exhibit 2(e)**

**January 26, 1999 letter from Department of Justice to R. Hegestad**



U. S. Department of Justice

Washington, D.C. 20530

JAN 26 1986

Robert E. Heggstad  
Heggstad & Weiss, P.C.  
Suite 600  
1320 19th St., NW  
Washington, DC 20036

Dear Mr. Heggstad:

Your Freedom of Information Act/Privacy Act (FOIA/PA) request was received by this office which serves as the receipt and referral unit for FOIA/PA requests addressed to the Department of Justice.

We have referred your request to the Department component(s) you have designated or, based upon descriptive information you have provided, to the component(s) most likely to have the records. Components to which your request has been forwarded are indicated on the enclosed listing. All future inquiries concerning the status of your request should be addressed to the component(s) which now has your letter for response. This office does not participate in the decision to grant or deny access to records.

Sincerely,

*for Betty S. Clark*  
Benjamin F. Burrell, Director  
Facilities and Administrative  
Services Staff  
Justice Management Division

Enclosure  
Freedom of Information Act/Privacy Act  
Referral/Action Slip

U.S. Department of Justice  
Justice Management Division

Freedom of Information Act/Privacy Act  
Referral/Action Slip

Date: JAN 26 1999

Clerk: McCullough  
Organization: JMD/FASS  
Building & Room: LOC, Room 115

- | To                       | From   | To                                  | From   |
|--------------------------|--|-------------------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> Office of Information & Privacy<br><input type="checkbox"/> The Attorney General<br><input type="checkbox"/> Deputy Attorney General<br><input type="checkbox"/> Associate Attorney General<br><input type="checkbox"/> Public Affairs, Office of<br><input type="checkbox"/> Legislative Affairs, Office of<br><input type="checkbox"/> Policy & Development, Office of<br><input type="checkbox"/> Intergovernmental Affairs, Office of | <input type="checkbox"/>            | <input type="checkbox"/> Immigration Review, Executive Office for    |
| <input type="checkbox"/> | <input type="checkbox"/> Antitrust Division  | <input type="checkbox"/>            | <input type="checkbox"/> Inspector General, Office of                |
| <input type="checkbox"/> | <input type="checkbox"/> Bureau of Prisons   | <input type="checkbox"/>            | <input type="checkbox"/> Intelligence Policy, and Review, Office of  |
| <input type="checkbox"/> | <input type="checkbox"/> Civil Division  | <input type="checkbox"/>            | <input type="checkbox"/> INTERPOL, U.S. National Central Bureau      |
| <input type="checkbox"/> | <input type="checkbox"/> Civil Rights Division   | <input type="checkbox"/>            | <input type="checkbox"/> Justice Management Division<br>Staff: _____ |
| <input type="checkbox"/> | <input type="checkbox"/> Community Relations Service   | <input type="checkbox"/>            | <input type="checkbox"/> Justice Programs, Office of                 |
| <input type="checkbox"/> | <input type="checkbox"/> Community Oriented Policing Services  | <input type="checkbox"/>            | <input type="checkbox"/> Legal Counsel, Office of                    |
| <input type="checkbox"/> | <input type="checkbox"/> Criminal Division   | <input type="checkbox"/>            | <input type="checkbox"/> Pardon Attorney, Office of                  |
| <input type="checkbox"/> | <input type="checkbox"/> Drug Enforcement Administration   | <input type="checkbox"/>            | <input type="checkbox"/> Professional Responsibility, Office of      |
| <input type="checkbox"/> | <input type="checkbox"/> Environment & Natural Resources Division  | <input type="checkbox"/>            | <input type="checkbox"/> Solicitor General, Office of                |
| <input type="checkbox"/> | <input type="checkbox"/> Federal Bureau of Investigation   | <input type="checkbox"/>            | <input type="checkbox"/> Tax Division                                |
| <input type="checkbox"/> | <input type="checkbox"/> Foreign Claims Settlement Commission  | <input checked="" type="checkbox"/> | <input type="checkbox"/> U.S. Attorneys, Executive Office for        |
| <input type="checkbox"/> | <input type="checkbox"/> Immigration & Naturalization Service  | <input type="checkbox"/>            | <input type="checkbox"/> U.S. Marshals Service                       |
|                          |  | <input type="checkbox"/>            | <input type="checkbox"/> U.S. Parole Commission                      |
|                          |  | <input type="checkbox"/>            | <input type="checkbox"/> U.S. Trustees, Executive Office for         |
|                          |  | <input type="checkbox"/>            | <input type="checkbox"/> _____                                       |

Requester: Robert E. Heggstad

Ref: \_\_\_\_\_

Date of Request: January 8, 1999

Received By: FOI/PA, Referral Unit Type of Request: FOIA

Remarks: Requester advised of this referral.



## **Exhibit 2(f)**

**February 5, 1999 letter from Bonnie Gay to R. Hegestad**



U.S. Department of Justice

Executive Office for United States Attorneys  
Freedom of Information/Privacy Act Unit  
600 E Street, N.W., Room 7100  
Washington, D.C. 20530  
202-616-6737 Fax 202-616-6478

Mar 23 1999

Request Number: 99-318 Date of Receipt: Feb. 5, 1999

Requester: Robert Heggstad Subject: Robert P. Brooks & Harry S. Stonehill

Dear Requester:

In response to your Freedom of Information Act and/or Privacy Act request, the paragraph(s) checked below apply:

- 1. [ ] Your request has been forwarded to \_\_\_\_\_ for a direct response to you.
- 2. [XX] The records responsive to your request have been destroyed pursuant to Department of Justice guidelines.
- 3. [ ] Your request seeks public records which may be obtained from the clerk of the court.
- 4. [ ] Your request pertains to state or local matters, the records for which are maintained by state or local agencies and, therefore, are outside the scope of the Act. You should contact the pertinent state or local agency for a response to your request.
- 5. [ ] The Freedom of Information Act only applies to records already in existence and does not require an agency to conduct research, create new records, or answer questions disguised as FOIA requests.
- 6. [ ] Your request concerns material which is publicly available through the Government Printing Office. You can obtain/purchase a copy of the requested material by writing to the Superintendent of Documents, U.S. Government Printing Office, Washington, D.C. 20402.
- 7. [ ] This office is continuing its work on the other subject/districts mentioned in your request.
- 8. [XX] This is the final action my office will take on your request.

Sincerely,

Bonnie L. Gay  
Senior Counsel for  
Douglas N. Frazier  
Acting Assistant Director  
FOIA/PA Unit