

No. 15-5183

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IN THE UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT

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AMERICAN CIVIL LIBERTIES UNION and  
AMERICAN CIVIL LIBERTIES UNION FOUNDATION,

Appellants,

v.

CENTRAL INTELLIGENCE AGENCY, *et al.*,

Appellees.

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**STATEMENT OF ISSUES TO BE RAISED**

1. Whether the district court erred in concluding that the full investigative report on the CIA's now-discontinued program of detention, torture, and other abuse of detainees, authored by the Senate Select Committee on Intelligence and transmitted to the executive branch for its use and dissemination, is not an "agency record" subject to the Freedom of Information Act.

Respectfully submitted,

/s/ Hina Shamsi

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July 24, 2015