

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CITIZENS UNITED,)	
)	
Plaintiff,)	
)	
v.)	Civil No. 18-1862-RDM
)	
UNITED STATES DEPARTMENT OF STATE,)	
)	
Defendant.)	

SECOND DECLARATION OF JEREMIAH L. MORGAN

1. My name is Jeremiah L. Morgan. I am counsel for Citizens United (“CU”), the plaintiff in the above-captioned case filed against defendant, the U.S. Department of State, under the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”).

2. This Declaration is submitted pursuant to Rule 56(c)(4), Federal Rules of Civil Procedure, in support of Citizens United’s Memorandum in Opposition to Defendant’s Renewed Motion for Summary Judgment (“CU Memo”), filed today. The statements made herein are based on information learned in my research and upon conclusions reached based on that information.

3. A publicly available research document, which has been reported to be contained in Document 7, claims that there were internet communications between the Trump Organization and a Russian bank. That document states: “Network logs show a distinctively human pattern of communications between a hidden server dedicated for use by the Trump Organization and the Russian financial company Alfa Bank, which has close ties to the Kremlin.” *See J.*

