USSS Reply Arguments:

1. Relevance of Data to the Assassination.

These are highly relevant to the historical understanding of the assassination. Eileen Dinneen's memorandum that "Upon Team IV's request for all files involving potential threats to President Kennedy's safety, 413 cases were released for review.

Mission of PRS (Testimony of Robert Bouck)

- Fact that HSCA looked at these files

- Absolutely wrong in their assessment that "At best, therefore, the public itnerest in these cases would appear to be negligible and remote from the JFK assassination. The Secret Service fails to appreciate the relevance of this type of information. Plus - as they state themselves, they provided us with trip reports. Under the Service's argument, these too have no relevance.

2. Secret Service Witholding of Evidence

Board was aware of the other doctor's memorandum. However, we recieved eight letters - all dated after the meeting. This left the Review Board with no basis for replying to these individuals.

Contrary to their implied assertions, the Board was never aware of the White House Security Review Committee's existence or recommendations.

- 3. Disregard for the Concerns Expressed by Mental Health Organizations and Scholars
  - Inaccurate
  - Why didn't Service have the mental health providers at meeting?
- 4. "Misconceptions by Mental Health Providers"

- Still not the kind of records that they would have us believe."

5. Disclosure to the Secret Service by the mental health community

- WE clearly apprecaite the principles of privileged communication and mental health records confidentiality.

- We don't insist that information contained in the summary data is authorized for public disclosure by the very fact that the information also been released to the Secret Service (Our footnote 8, page 6)

- Service produced no confidentiality agreements to rebut this waiver.

- (Absent clear and convincing evidence the Board must release this information).
- 6. The Record
  - 1981 document is that which controls

- Have been careless and it is the Service's obligation to safeguard this information.

- Jane Vezeris mentions that the earlier versions are in the archives, and that she thinks the 1960's volumes are in the archives.

## 7. Civil Commitment Records

- The burden was on them to show policy arguments for each individual. They did not do this.

- Ignores the inconsistency of the Service's own actions in opening other records

8. Destruction of Assassination Records by the Secret Service

- 9. Invasion of Personal Privacy
  - Age of the records (Cite President's Executive order)
  - Individual who was a juvenile plus, you commit an act like that, you assume the risk.

10. "Broadcasting the issue among the mental health community."

- Disingenuous to assert that they have not engaged in a campaign regarding this issue.

- The whole issue is nondisclosure because of the privacy of this type of information. The Secret Service has not voted to release it, the Board has. The Service has not in and of itself, contravened its promises to the mental-health community. However, the very thing of which the service complains (that mental health providers, upon hearing about this release, won't cooperate with the service ) has been exacerbated by the Service's actions.

- Service showed this to HSCA