

Certification of the General Counsel
Regarding the April 23 - 24, 1997 Closed Meeting of the
Assassination Records Review Board

Pursuant to 5 U.S.C. § 552b(f)(1), we hereby certify, as General Counsel and Staff Counsel to the Assassination Records Review Board, that we attended the April 23 - 24, 1997 closed meeting of the Review Board. It is my opinion that the meeting was properly closed to the public based upon the following Sunshine Act exemptions:

- classified national security information (§ 552b(c)(1));
- personal matters, the disclosure of which may lead to an unwarranted invasion of privacy (§ 552b(c)(6));
- investigatory records compiled for law enforcement purposes (§ 552b(c)(7));
- litigation strategy (§ 552b(c)(10)).

Certified by:

T. Jeremy Gunn
General Counsel

Brian Rosen
Senior Analyst and Staff Counsel

Date: April 24, 1997