

AUG 12 2009

APPROVED FOR RELEASE DATE:
03-01-2011

Delores M. Nelson
Information and Privacy Coordinator
Central Intelligence Agency
Washington, DC 20505

Dear Madam:

This letter constitutes an administrative appeal under the Freedom of Information Act, 5. U.S.C. Sec. 552(a)(6).

I am writing to appeal the determination by the Central Intelligence Agency with regard to my FOIA request filed on 29 June 2009, File number F-2009-01323 for records concerning Lebanese drug trafficker Sami al-Khoury (also known as Samil Khoury or Sami Khoury), who was active in the drug trade between 1940 and 1970. By letter of 15 July 2009, the Central Intelligence Agency denied my request in accordance with FOIA exemptions (b)(1) and (b)(3). The agency has stated that it can "neither confirm nor deny the existence or nonexistence of requested records responsive" to my request.

I premise this appeal primarily upon two grounds. Firstly, information related to Sami al-Khoury and to the CIA's knowledge of his activities exists already in the public domain. His activities as a drug trafficker is cited in several printed publications. References to Sami Khoury can be found, for example, in Douglas Valentine's *Strength of the Wolf* (Verso, 2004) on pages 124, 125, 159, 170, 187, 197. A great many declassified documents related to Federal Bureau of Narcotics' investigations into Sami al-Khoury's criminal enterprises can also be found in the National Archive in Silver Spring, Maryland. In one document (which I have enclosed in this envelope as Attachment A) dated 20 May 1959, reporting FBN agent Paul Knight describes the waning of Khoury's influence among drug traffickers in Lebanon.

Secondly, I submit this appeal with the understanding that information related to Sami al-Khoury is entirely of a historical nature. Sami al-Khoury, according to my understanding, has passed away and, with that, all investigations into his criminal enterprises have ceased. I seek the release of information into Sami al Khoury's activities for the purposes of writing a full-length monograph on the history of drug trafficking in the Middle East during the twentieth century.

I look forward to receiving your decision on this appeal within the 20-day statutory time limit. If you have any questions, or believe discussion of this matter would be beneficial, please contact me directly at [redacted] or [redacted]

Sincerely, [redacted]

Ryan Gineras [redacted]

[redacted]

Attachment A

MAY 28 AM 1959 MEMORANDUM REPORT
Bureau of Narcotics
District 17

Beirut, Lebanon
20 May 1959

In re: LEBANON

1. A "trends" report about the situation here, with particular regard to the work of this office, may be helpful, especially since various agents will probably be coming here to work on a sort of rotation scheme.
2. It has been some time, mostly because of the uprising last year, since any agents have been in this area for any extended period. During this time, the situation has changed in certain ways. Chief among the changes is reflected by the attitude of the public, including (most importantly) the traffickers: it is generally believed here that the government means its statements that it is going from now on to deal much more strictly with narcotics offenders, and that the days when the Justice Department often did not deal strictly (or at all) with such matters, are over. As I mentioned in a previous report, many of the old-timers, such as Samil KHOURY, have definitely lost their influence; and this example has frightened even those not directly concerned. Our new, beginning efforts against Ali HALAWI, Fayssal RAHMO, and Antoine ARAMAN have shown an increased wariness on the part of suspects.
3. One result is to be expected: traffickers will be more insistent upon knowing their customers well, and upon receiving partypayment in advance.
4. There are no doubt new faces in the traffic here, to replace the "old guard" of such men as KHOURY, who no longer can feel that they have immunity. Behind these new people will still be the few well-known sources in Syria, chief among these being Fayssal RAHMO. From very numerous sources, both official and in the underworld, I have heard that the only really big suspects still in operation, of those we know here, are Ali HALAWI, Ali EL HAME (HAMASTI), and Antoine ARAMAN. Omar MAKKOUK is in prison, as is KHOURY. Tanius COFFAS has suffered crippling financial losses through seizures; Youssaf EL EPIR is dead - these as examples.
5. We need two things: new SEs in the area; and an increased effort in the Aleppo, Latakia, Homs area. The SEs who worked for us here a year or more ago, are almost without exception known as informants, or have no longer any valuable contacts. The period of infrequent presence of agents here caused a break

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In our program of obtaining good new SEs. As reflected in some of our current reports, we are trying to correct this situation.

6. Another action is an attempt, now under way, to recruit SEs capable of working in Syria, and making a study of the possibilities of working there. The District Supervisor is coming to this area soon to aid in liaison with the UAR authorities, and has asked me to prepare a schedule of work in Syria. I think that I have a chance now to obtain the cooperation of one or two good new SEs for Syria, and I am preparing the requested outline of leads and suspects in Syria.

7. Preparatory to discussion with the Supervisor when he arrives, I might add here that it is the impression of both Agent Chaigaux and me that it may well be found that it is necessary, from a number of points of view, to have at least one agent permanently assigned to Beirut, as in the past. Aside from the consideration of the unfortunate necessity for agents to be temporarily absent from home, here, for extended periods, the matter of continuity of liaison and contacts with SEs and cases, is important. This matter has been mentioned to us by both Embassy officials and our local collaborators.

Paul B. Knight
Paul B. Knight
Narcotic Agent

cc: Bureau
Beirut Office