

Certification of the General Counsel
Regarding the February 13, 1997 Closed Meeting of the
Assassination Records Review Board

Pursuant to 5 U.S.C. § 552b(f)(1), I hereby certify, as General Counsel to the Assassination Records Review Board, that I attended the February 13, 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:

-- discussion of possible litigation strategy

Certified by:

T. Jeremy Gunn
General Counsel

Date: February 13, 1997