

RELEASE IN PART  
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**The Legal Adviser  
United States Department of State**

*Washington, D.C. 20520*

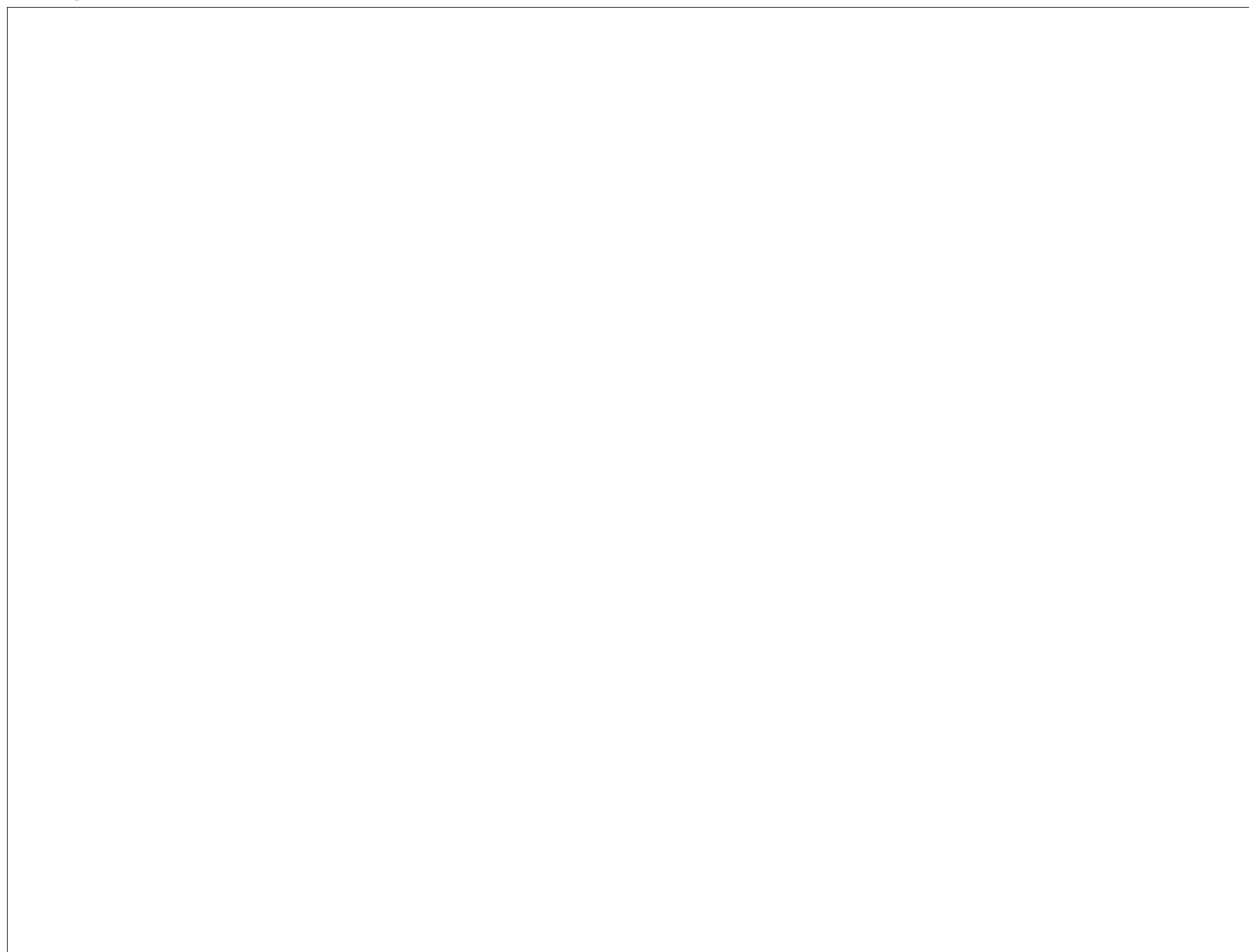
**DRAFT: SENSITIVE BUT UNCLASSIFIED;**  
**ATTORNEY WORK-PRODUCT**

January 31, 2010

David Barron, Esq.  
Acting Assistant Attorney General  
Office of Legal Counsel  
U.S. Department of Justice

**Re: Constitutionality of Possible Senate Appropriations Amendment  
regarding Permissible Venue of 9/11 criminal trials**

Dear David:



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Please let us know if you would like to discuss any aspect of this analysis. We are of course willing and able to conduct more research and analysis on this important issue as it unfolds.

Sincerely

*Harold*

Harold Hongju Koh  
The Legal Adviser