



July 17, 1998

VIA CERTIFIED MAIL. RETURN RECEIPT REQUESTED

FOIA Officer
Room 4525
Bureau of Export Administration
U.S. Department of Commerce
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230
Attn: Henry Gaston

Re: Freedom of Information Act Request

Dear Mr. Gaston:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. 552, and the FOIA regulations of the Department of Commerce, Judicial Watch, Inc. hereby requests from the U.S. Department of Commerce ("DOC") under the Bureau of Export Administration and the President's Export Council Subcommittee on Export Administration, all correspondence, memoranda, documents, records, lists of names, applications, diskettes, letters, expense logs and receipts, calendar or diary logs, facsimile logs, telephone records, tape recordings, notes, and other documents and things that refer or relate to the following in any way:

1. Mr. Bernard Schwartz, Chairman of Loral Space and Communications Ltd.
2. Loral Space and Communications Ltd. ("Loral")
3. Hughes Electronics, including all its subsidiaries, including but not limited to Hughes Space and

501 School Street, S.W., Suite 725, Washington, D.C. 20024, Tel: (202) 646-5172
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Communications.

4. C. Michael Armstrong, former chairman of Hughes Electronics and current chairman of AT&T.
5. Mr. Wah Lim, of Loral Space and Communications.
6. Mr. Shen Jun, of Hughes Space and Communications.
7. Ms. Liu Chao-ying.
8. Waivers or approvals by the Clinton Administration granting authority to Loral and/or Hughes to provide technical assistance or information concerning launch vehicle guidance technology to Chinese firms or agencies.
9. Asia-Pacific Mobile Telecommunications.
10. China Aerospace Corporation.
11. China Satellite Launch and Tracking Control.
12. China Resource Holdings.
13. Mr. Wang Jun.
14. China International Trade and Investment Corporation.
15. Motorola, Inc.
16. Iridium World Communications, Ltd.
17. Export of machine tools by the McDonnell Douglas Corporation to the China National Aero-Technology Import and Export Corporation (CATIC) (and related companies).
18. Waivers or approvals by President William Clinton to permit the launch of U.S. satellites by Chinese launch vehicles.
19. Decisions to remove any item from a "munitions list" with regard to exports, including satellites, to China.

20. China Great Wall Industry Corporation.
21. The Clinton Administration decision to transfer jurisdiction from the Department of State to the Department of Commerce of licensing, controls, and/or waivers relating to technology transfer and/or exports involving satellite communications and the launching of U.S. satellites by foreign nations.
22. Any political advantage to the Democratic Party or Democratic candidates as a result of official Administration activities or fund-raising goals, activities, or effects for the Democratic Party or affiliated groups in connection with:
 - (a) altering any U.S. government policy with respect to China;
 - (b) promoting or accommodating U.S. business interests in China;
 - (c) promoting or accommodating Chinese business interests in the U.S.;
 - (d) satellite or satellite-launch technology, activities, or policies;
 - (e) policies regarding transfer of missile or satellite technologies to China.
 - (f) policies regarding transfer of high technology, including computers, to China.

We expect an answer within 20 days as required by FOIA.

Judicial Watch also requests a blanket fee waiver in the public interest, to which it is entitled under 5 U.S.C. § 552(a)(4)(A); *see also, Larson v. Central Intelligence Agency*, 843 F.2d 1482, 1483 (D.C.Cir. 1988); *National Security Archive v. U.S. Dept. of Defense*, 880 F.2d 1381, 1385-87 (D.C.Cir. 1989); *see also, Judicial Watch, Inc. v. United States Dep't of Commerce*, No. 95-0133 (D.D.C. (RCL) May 16, 1995) (order granting Judicial Watch, Inc.'s request for fee waiver with regard to all responsive documents in proceeding related to DOC).

Judicial Watch, Inc. is a non-profit, educational organization, organized under Section 501(c)(3)

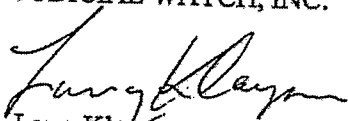
of the I.R.S. Code. Judicial Watch seeks to improve the ethical and legal standards in government, the accountability of government officials to the rule of law, and the public understanding of government operations, including the operations of the DOC.

The subject of this request is information concerning the operations and activities of the government. Past experience of Judicial Watch demonstrates the success of Judicial Watch in uncovering important facts about government activities, integrity, and operations that are of broad concern to the public. The press frequently seeks information obtained by Judicial Watch information obtained by Judicial Watch pursuant to FOIA. Judicial Watch's request is likely to "contribute significantly" to the public's understanding of the operations of their government, satisfying the requirements of FOIA public interest fee waiver provisions. Judicial Watch's capabilities and effectiveness in effectuating Congressional intent or interest in connection with the public interest fee waiver provisions of FOIA are a matter of public record.

Judicial Watch will use the requested material to promote accountable government as an adjunct to, or representative of, the news media and the public under 5 U.S.C. § 552(a)(4)(A)(ii)(II) and *National Sec. Archive v. U.S. Dept. of Defense*, 880 F.2d 1381, 1385-87 (D.C.Cir. 1989), by disseminating relevant information uncovered. Information will benefit the public by identifying areas for future reform as well as deterring future abuses that could otherwise proliferate without public scrutiny.

Sincerely,

JUDICIAL WATCH, INC.



Larry Klayman
Chairman and General Counsel