

Exhibit A



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8TH FLOOR WEST
WASHINGTON, DC 20005
(202) 640-2850
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VIA eFOIPA

Record/Information Dissemination Section
Attn: FOIPA Request
170 Marcel Drive
Winchester, VA 22602-4843

Re: Freedom of Information Act

Dear FOIA Officer:

This is a request under the Freedom of Information Act, 5 U.S.C. § 552. On behalf of our firm's client, Zackary Ellis Sanders, we hereby request the following records:

- All records relating to Project Habitanace from January 2019 to the present. Project Habitanace "is the [United Kingdom's National Crime Agency]'s response to hidden services, specifically criminally motivated by Child Sexual Abuse and Exploitation (CSAE) sites and services."¹ Project Habitanace includes international law enforcement partners,² including the Federal Bureau of Investigation (FBI). It has been widely reported that the National Crime Agency (NCA) and the FBI work together to investigate cybercrime.³
- Administrative staff manuals and instructions to staff regarding Project Habitanace from January 2019 to the present.
- Records relating to Internet Protocol (IP) addresses provided by the United Kingdom's NCA to the Federal Bureau of Investigation (FBI) as part of Project Habitanace, from January 2019 to the present.

¹ Office of Chief Constable, *Chief Constable's Update* (March 2, 2020), https://www.gwent.pcc.police.uk/media/tf1lonp2/3a_cc_update_report_v1-3.pdf.

² *Intelligence Officer (JS/CR/12825)*, <https://www.aplitrak.com/?adid=am9hbi5zYWxlB54xNjYwMi4yNzYyQHNIcnZvY2FyZXMuYXBsaXRyYWsuY29t>.

³ See, e.g., Robert Cookson and Hannah Kuchler, *NCA and FBI disrupt global malware network*, Financial Times (June 2, 2014), <https://www.ft.com/content/495f720c-ea77-11e3-8dde-00144feabdc0>; Department of Justice Office of Public Affairs, *Two Iranian Men Indicted for Deploying Ransomware to Extort Hospitals, Municipalities, and Public Institutions, Causing Over \$30 Million in Losses*, Department of Justice (Nov. 28, 2018), <https://www.justice.gov/opa/pr/two-iranian-men-indicted-deploying-ransomware-extort-hospitals-municipalities-and-public>; @NCA_UK, Twitter (Dec. 5, 2019, 11:01AM), https://twitter.com/NCA_UK/status/1202618928209498114; *International law enforcement operation exposes the world's most harmful cybercrime group*, National Crime Agency (Dec. 5, 2019), <https://public-newsroom-nca-01.azurewebsites.net/news/international-law-enforcement-operation-exposes-the-worlds-most-harmful-cyber-crime-group>.

- Records relating to the FBI's investigation of the hidden service Hurt Meh, from January 2019 to the present.⁴

Please include all correspondence related to the above requests, including tips and information exchanged between the NCA and the FBI, between the NCA and the British Consulate in Miami, and between the British Consulate in Miami and the FBI.

Our request for records and correspondence includes, but is not limited to, paper records, electronic records, audiotapes, videotapes, photographs, data, correspondence, letters, emails (including the to, from, cc, and bcc fields), text messages, facsimiles, voicemail messages, transcripts, and notes.

Please conduct a search of the Central Records System, including but not limited to the Electronic Surveillance (ELSUR) Indices, the Physical Surveillance (FISUR) Indices, and the Technical Surveillance (TESUR) Indices, for both main-file records and cross-reference records of both HQ and all field offices for all relevant information. If previously released records are available, then I request a rolling release consisting of those records while additional records are located and processed for release.

The requested documents will be made available to the general public, and this request is not being made for commercial purposes.

Please supply the records without informing us of the cost if the fees do not exceed \$1000.00, which we agree to pay. If the fees for providing the records exceed \$1000.00, please let us know before you fill our request. I would prefer the request filled electronically, by e-mail attachment if available or CD-ROM if not.

Thank you in advance for your anticipated cooperation in this matter. As provided by law, we anticipate receiving a response to this request within twenty (20) working days. 5 U.S.C. § 552(a)(6)(A)(i). If you have any questions about handling this request you may reach us by telephone at (202) 640-2850, or by email at jchong-smith@kaiserdillon.com and jjeffress@kaiserdillon.com.

Sincerely,



Jade Chong-Smith

Jonathan Jeffress

Counsel for Zackary Ellis Sanders

⁴ Dustin Godfrey, *Penticton man pleads guilty to creating a child porn forum*, Penticton Western News (Dec. 13, 2017), <https://www.pentictonwesternnews.com/news/penticton-man-pleads-guilty-to-creating-a-child-porn-forum/>; Colin Dacre, *Local ran child-porn forums*, Castanet: Kelowna's Homepage (Dec. 13, 2017), <https://www.castanet.net/news/Penticton/213950/Local-ran-child-porn-forums>; Dustin Godfrey and Kristi Patton, *Child porn forum moderator in Penticton sentenced to five years*, Kelowna Capital News (Jan. 9, 2018), <https://www.kelownacapnews.com/news/child-porn-forum-moderator-in-penticton-sentenced-to-five-years/>.