

EXHIBIT 4

March 2, 2021

Secretary of the Air Force
THRU: 502 CS/SCOK (FOIA)
151 J Street East, Suite 124A
JBSA-Randolph, TX 78150-4342

Dear Colonel Trotter and Officer Anh Trinh:

This is an appeal under the Freedom of Information Act, 5. U.S.C. § 552 *et seq.* (“FOIA”).

Willkie Farr & Gallagher LLP (“Willkie Farr”) represents over 700 American veterans, civilians, and their family members in connection with deaths and injuries caused by terrorists in Afghanistan. On behalf of its clients, Willkie Farr filed a lawsuit against several U.S. and international contractors alleging that they made protection payments to terrorists who killed or wounded thousands of Americans in Afghanistan. See *Cabrera et al. v. Black & Veatch Special Projects Corporation et al.*, Case No. 1:19-cv-03833 (D.D.C. 2019). As part of our investigation of these allegations, we submitted a FOIA request to United States Central Command (“CENTCOM”) (the “Request”), which was referred in part to Joint Base San Antonio (“JBSA”).

The chronology of relevant events is as follows:

- On February 28, 2020, Willkie Farr paralegal, Danny Weinfeld, submitted the following Request to CENTCOM’s FOIA staff via electronic mail on behalf of Willkie Farr attorney, Michael Gottlieb:
 - **FOIA Request No. 2020-02975-F**, which sought all contracts and related documentation with Armor Group North America, Inc. for the “Shindand Airbase Contract,” Contract FA 8903-06-D-8511, awarded to Armor Group North American, Inc. and Environmental Chemical Corporation, Inc. in March 2007. *See* Exhibit A.
 - To aid the search for responsive records, the Request included specific identifying information, including background information, relevant dates and date ranges, and search terms to help locate documents.
- On July 17, 2020, JBSA emailed Willkie Farr to acknowledge that it had received Willkie Farr’s Request from CENTCOM on June 3, 2020. On July 29, 2020, JBSA identified for Willkie Farr the portion of the Armor Group FOIA Request that had been referred to the JBSA team. *See* Exhibits B, C.

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- On November 25, 2020, JBSA sent Willkie Farr a Final Response Memorandum which indicated that Willkie Farr's Request was partially denied, and that documents were redacted due to 5 U.S.C. § 552(b)(4), (b)(5), (b)(6), and (b)(9). JBSA did not provide an explanation or reasoning as to its conclusion that these FOIA exemptions justified withholding documents. Rather, the Final Response Memorandum only quoted the text of the statutes listed above. *See* Exhibit D.

We write to appeal JBSA's partial withholding of documents responsive to the Request.

According to JBSA, "[b]ased on the recommendations from the 772d Enterprise Sourcing Squadron (772 ESS), Air Force Information Mission Support Center (AFIMSC) Legal and 502d Air Base Wing (502 ABW) Legal, portions of the FOIA Request [are] "Partially Denied" and to be withheld" in order to:

- Protect trade secrets and commercial or financial information obtained from a person that is privileged or confidential [Exemption (b)(4)];
- Protect inter-agency or intra-agency memoranda or letters which would not be available by law to a party in litigation with the agency [Exemption (b)(5)];
- Prevent disclosure of information that would constitute a clearly unwarranted invasion of personal privacy [Exemption (b)(6)]; and
- Protect geological and geophysical information and data, including maps concerning wells [Exemption (b)(7)].

Accordingly, the production is heavily redacted, primarily for claimed Exemption 4 purposes.

5 U.S.C. § 552(b)(4) provides that FOIA's disclosure requirements "do not apply to matters that are trade secrets and commercial or financial information obtained from a person and privileged or confidential." JBSA's invocation of Exemption 4 is deficient because it does not explain why the privacy interests of any individual or business would be implicated by the requested disclosure. JBSA also provides no detail regarding how it weighed FOIA's presumption of public disclosure against any privacy interests in making its redaction determination. JBSA's vague and blanket assertions of statutory exemptions do not provide Willkie Farr with sufficient detail to assess the applicability of any exemptions and thus hinders Willkie Farr's ability to draft a substantive appeal.

Moreover, it is unlikely that the information JBSA redacted falls within Exemption 4. JBSA invoked Exemption 4 to redact representations and cost estimates regarding construction of Shindand Airbase, technical evaluations of prime and subcontractors' submissions, and proposals submitted in response to modified task orders. Crucially, these general representations about capabilities, counterparties, and costs are very much different from "trade secrets"¹ and financial data "with an intrinsic commercial value,"² which are at the center of the 5 U.S.C.

¹ *Public Citizen Health Research Group v. FDA*, 704 F.2d 1280, 1288 (D.C. Cir. 1983)(adopting a narrow definition of a trade secret under 5 U.S.C. § 552(b)(4), namely as "a secret, commercially valuable plan, formula, process, or device that is used for making, preparing, compounding, or processing of trade commodities and that can be said to the end product of either innovation of substantial effort.).

² *N.Y. Pub. Interest Research Group v. EPA*, 249 F. Supp.2d 327, 332-34 (S.D.N.Y. 2003)

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§552(b)(4) protection. Any commercial value inherent to these general details was specific to the Shindand Airbase contract itself, and given that it has been over thirteen years since JBSA awarded this contract to ECC and Armor Group, that value has fully dissipated. Additionally, it is unclear that ECC and Armor Group “both customarily and actually treat [the withheld information] as private,” which is required for an Exemption 4 withholding to be proper.³

The Supreme Court suggests that government assurance that information will remain private may *also* be necessary for such information to qualify as “confidential” under Exemption 4.⁴ JBSA’s various requests for proposal and other documents soliciting information from ECC and Armor Group contain no indication that JBSA would maintain the redacted information as private. It is unlikely that JBSA made such representations given that the Shindand Airbase Contract was a public contract, funded by taxpayer money, and subject to congressional oversight.⁵

As noted above, JBSA also justifies redactions under 5 U.S.C. § 552(b)(5), (b)(6), and (b)(9). JBSA’s redactions under Exemptions (b)5, (b)6, and (b)9 are deficient because, similar to its use of Exemption 4, these blanket and vague exemption assertions do not provide Willkie with the grounds to draft a substantive appeal. JBSA has not identified which individual or agency is invoking the unspecified privilege under Exemption 5, nor does it specify which agencies’ communications or privileges were implicated by the Request. With regard to Exemption 6, JBSA does not explain what specific privacy concerns might overcome (b)(6)’s “presumption in favor of disclosure [that] is as strong as can be found anywhere in the [FOIA].”⁶ JBSA was particularly obligated to justify its redaction of the names of ECC and Armor Group officials. These officials were surely aware of the public interests involved with high dollar government contracts. Moreover, JBSA does not explain what privacy interests these individuals possess nor do they explain why such interests override the statutory presumption in favor of disclosure. Similarly, JBSA fails to identify and justify its Exemption 9 redactions. JBSA’s failure to provide such explanation is particularly harmful given the applicability of Exemption 9 to this production—and its rationale is far from obvious. Cases interpreting Exemption 9 state that Congress intended it to prevent abuse of FOIA by participants in natural resource extraction industries,⁷ and to that end, the exemption only applies to “well information of a technical or scientific nature,” and not to general geophysical data.⁸

Even if we assume that portions of documents responsive to this Request are protectable under 5 U.S.C. § 552(b), JBSA redacted several lengthy documents in their entirety. JBSA thus ignored its statutory mandate under 5 U.S.C. § 552(b) to identify “[a]ny reasonably segregable portion of [the] record . . . after deletion of the portions which are exempt” and provide the segregable portions to [Willkie Farr] along with an explanation of [t]he amount of information

³ *Food Mtkg. Inst. V. Argus Leader Media*, 139 S. Ct. 2356, 2366 (2019).

⁴ *Id.* at 2363 (finding that “there’s no need to resolve that question in this case”).

⁵ See Commission on Wartime Contracting, *Transforming Wartime Contracting* (August 2011)(publishing information about contractor’s practices in Afghanistan, including information contained in submissions by contractors to agencies).

⁶ *Multi Ag Media LLC v. USDA*, 515 F.3d 1224, 1228 (D.C. Cir. 2008)(quoting *Nat’l Ass’n of Home Builders v. Norton*, 309 F.3d 26, 32 (D.C. Cir. 2002)).

⁷ *Starkey v. Department of Interior*, 238 F. Supp. 2d 1188, 1195 (S.D. Cal. 2002).

⁸ *Black Hills Alliance v. U.S. Forest Service*, 603 F. Supp. 117, 122 (D.S.D. 1984).

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deleted, and the exemption under which the deletion is made.” Entire records may be withheld *only* where “the exempt portions are ‘inextricably intertwined with [non]exempt portions’”⁹ and the “excision of the exempt information would impose significant costs on the agency and produce an edited document with little informational value.”¹⁰ For the aforementioned reasons, Willkie maintains that, based on the information provided, none of the FOIA exemptions apply and that it is entitled to full disclosure of documents responsive to the Request. In the event, however, that some elements of the documents in this production are protectable, it is very unlikely (given the logically limited applicability of Exemptions (b)4, (b)5, (b)6, and (b)9 to this production) that any such document should be redacted in a way that it loses all informational value. Additionally, the costs to JBSA of segregating exempt from non-exempt portions is hardly unduly burdensome, given the limited number of documents in this production.

Willkie appeals JBSA’s partial denial of our FOIA Request and renews its request for the documents at issue to be fully disclosed. Should our appeal be denied, Willkie requests more detailed information as to the basis for these denials. JBSA is required to provide a written response describing the reasons for the denial, the names and titles of each person responsible for the denial, and the procedures required to invoke judicial assistance in this matter. *See* 5. U.S.C. § 552(a)(6)(ii). We reserve our right under FOIA to seek judicial review, including the award of attorney’s fees, if this appeal is denied or your response is not forthcoming in 20 business days.

Thank you for your time and attention to this matter.

Sincerely,

/s/ Devin Charles Ringger

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⁹ *Johnson v. Exec Office for U.S. Attorneys*, 310 F.3d 771, 776 (D.C. Cir. 2002).

¹⁰ *Mays v. Drug Enf’t Admin.*, 234 F.3d 1324, 1327 (D.C. Cir. 2000).

EXHIBIT A

WILLKIE FARR & GALLAGHER_{LLP}

1875 K Street, N.W.
Washington, DC 20006-1238
Tel: 202 303 1000
Fax: 202 303 2000

February 28, 2020

United States Central Command J6-RDF (FOIA)
7115 South Boundary Boulevard
MacDill AFB, FL 33621-5101
Email: centcom.macdill.centcom-hq.mbx.freedom-of-information-act@mail

Re: Freedom of Information Act

To Whom It May Concern,

My firm represents over 380 American veterans, civilians, and their families in connection with deaths and injuries caused by terrorists in Afghanistan. On behalf of our clients, we filed a lawsuit against several U.S. and international contractors, alleging that they made protection payments to terrorists who killed or wounded thousands of Americans in Afghanistan. *See Cabrera et al v. Black & Veatch Special Projects Corporation et al*, Case No. 1:19-cv-03833 (D.D.C.). As part of our investigation of these allegations, and on behalf of our clients who have made great sacrifices in connection with America's involvement in Afghanistan, we submit this request under the Freedom of Information Act, 5 U.S.C. §§ 552, et seq. ("FOIA") for copies of the records described below.

Records Requested

All contracts and related documentation (including RFPs, bids, show cause and cure notices, task orders, subcontracts, and audits) with "**ArmorGroup North America, Inc.**" (CAGE Code 1W7P6) or "**ArmorGroup International plc**" or "**ArmorGroup International Limited**" or "**ArmorGroup Services Limited**" or "**G4S Risk Management Limited**" of "**Centerra Group, LLC**" or "**AGNA**" or "**G4S Holdings International (AG) Limited**" or "**G4S Government Solutions, Inc.**" or "**Wackenhut Services, Inc.**" or "**G4S plc**" or "**G4S Risk Management Limited**" for projects in Afghanistan. Contracts and subcontracts include but are not limited to:

- The “PRT Security” Contract with ArmorGroup North America, Inc. (CAGE Code 1W7P6) awarded in 2008 or 2009 (Award ID SAQMPD07C0054). In or about 2008-2009, AGNA and AGI obtained a contract to provide security for a Coalition Provincial Reconstruction Team’s (“PRT”) personnel in and around Helmand Province. On information and belief, this was a multiyear contract on which ArmorGroup generated millions of dollars in revenue.
- The “Shindand Airbase” Contract **FA-8903-06-D-8511** awarded to ArmorGroup North American, Inc. (CAGE Code 1W7P6) and Environmental Chemical Corporation (CAGE Code 0T0F8) in March 2007 (Award ID FA890306D8511-0018). The contract start date was March 13, 2007 and the contract end date was December 29, 2009. This contract is referred to in the U.S. Senate Committee on Armed Services, Report, Inquiry Into The Role & Oversight Of Private Security Contractors In Afghanistan, 5 (Oct. 26, 2010) available at https://fas.org/irp/congress/2010_rpt/sasc-psc.pdf.
- “2007 Kabul Embassy” Contract **SAQMPD-07-C0054** (Award ID SAQMPD07C0054), awarded July 2007. The U.S. State Department hired AGNA to provide security in and around the U.S. Embassy in Kabul, Afghanistan. The contract had a 5-year term and was valued at approximately \$189 million.
- The “2008 UNOPS Mine Clearance Contract”: In or about the summer of 2008, the United Nations Office For Project Services (“UNOPS”) retained ArmorGroup North American, Inc. (CAGE Code 1W7P6) to perform mine clearance in Herat Province, including the area in and around Shindand. The contract was valued at approximately \$15 million.
- The “2015 British Embassy Contract”: In 2015, G4S Holdings International (AG) Limited and/or G4S Risk Management Limited signed a 5-year, GBP 100 million contract to provide security in and around the British Embassy in Afghanistan.

The relevant date range for this request is **January 1, 2002 through December 31, 2014**.

Please search for responsive records regardless of format, medium, or physical characteristics. Where possible, **please produce records electronically in PDF format**. We seek records of any kind, including electronic records, audiotapes, videotapes, and photographs. Our request includes any letters, emails, facsimiles, telephone messages, voice mail messages, and transcripts, notes, or minutes of any meetings, telephone conversations, discussions, and any attachments to such records. If any of this information is currently classified or restricted distribution, we ask that you submit the records for declassification in accordance with Executive Order 13526, and all other relevant regulations, policies and orders governing declassification of documents.

For any responsive records, or portions of records, you deem covered by any applicable FOIA exemption, 5 U.S.C. § 552(b) prescribes the appropriate process: “[a]ny reasonably segregable portion of a record shall be provided...after deletion of the portions which are exempt under this subsection. The amount of information deleted, and the exemption under which the deletion is made, shall be indicated on the released portion of the record, unless including that indication would harm an interest protected by the exemption in this subsection under which the deletion is made. If technically feasible, the amount of the information deleted, and the exemption under which the deletion is made, shall be indicated at the place in the record where such deletion is made.”

I am willing to pay fees for this request up to a maximum of \$250. If the fees for this request exceed that amount, please inform me first. If it expedites the agency’s release of the requested documents, I am willing to accept disclosure on an interim, rolling basis as they become available. Please do not wait for all of the agency’s relevant systems of record to be searched, or all of its relevant records to be processed.

To discuss any aspect of this request, please contact my associate, Devin Ringger, at (202) 303-1463, or via email at dringger@willkie.com. Pursuant to 32 eCFR §286.5(c) my preference is to receive these records in their original native electronic format, and if that is not available, in PDF image format (one image per record, in color as applicable) through my email address. If the records prove too large to attach via email, my colleagues or I can provide a secure FTP link in which to upload the records.

Sincerely,

/s/ Michael J. Gottlieb

EXHIBIT B

From: MATTHEW, TABATHA D GS-09 USAF AETC 502 CS/SCOK <tabatha.matthew.1@us.af.mil>
Sent: Friday, July 17, 2020 4:06 PM
To: Ringger, Devin Charles
Subject: Acknowledgement of FOIA 2020-02975-F

Mr. Gottlieb,

I thought I sent you this email back on 3 June 2020 when I received your FOIA. However, I can't find any records that I did. I wanted to provide you with an update that it's still being worked at the moment by the agency. Once I get any status updates for your request, I will be sure to let you know.

Due to the COVID-19 pandemic, the Joint Base San Antonio Freedom of Information Act (FOIA) office has adjusted its normal operations to balance the need of completing its mission as effectively and efficiently as possible while also adhering to the recommended social distancing for the safety of our staff. As a result, you may experience a delay in receiving an initial acknowledgment as well as a substantive response to your FOIA request or appeal. We will be able to acknowledge requests made electronically more quickly than by mail. You may reach out to our FOIA Requester Service Center and FOIA Public Liaison if you have any questions about your request. We apologize for this inconvenience and appreciate your understanding and patience.

Very Respectfully,

Tabatha D. Matthew, GS-09, DAF
JBSA FOIA/PA Manager
502 CS/SCOK-Randolph
151 J Street East
JBSA-Randolph TX 78150-4342

☎DSN: 487-2186/2165 ☎Comm: (210) 652-2186/2165

☎Fax (210) 652-8152

Email: tabatha.matthew.1@us.af.mil

FOIA & PA Org Box Email: 502CS.FOIAandPAWorkflow.Workflow@us.af.mil

PAL: <https://efoia.milcloud.mil/App/Index.aspx>

JBSA FOIA Info: <https://www.jbsa.mil/Information/Freedom-of-Information-Act/>

EXHIBIT C

From: MATTHEW, TABATHA D GS-09 USAF AETC 502 CS/SCOK <tabatha.matthew.1@us.af.mil>
Sent: Wednesday, July 29, 2020 10:32 AM
To: Ringger, Devin Charles
Cc: Reddick, Nicholas
Subject: RE: Acknowledgement of FOIA 2020-02975-F
Attachments: Tab 2 Mr. Gottlieb FOIA Request, 3 June 2020.pdf

Mr. Ringger,

Attached is the request that we received and the highlighted portion is the portion that we at Joint Base San Antonio is working for this request.

Very Respectfully,

Tabatha D. Matthew, GS-09, DAF
JBSA FOIA/PA Manager
502 CS/SCOK-Randolph
151 J Street East
JBSA-Randolph TX 78150-4342

☎DSN: 487-2186/2165 ☎Comm: (210) 652-2186/2165

☎Fax (210) 652-8152

Email: tabatha.matthew.1@us.af.mil

FOIA & PA Org Box Email: 502CS.FOIAandPAWorkflow.Workflow@us.af.mil

PAL: <https://efoia.milcloud.mil/App/Index.aspx>

JBSA FOIA Info: <https://www.jbsa.mil/Information/Freedom-of-Information-Act/>

From: Ringger, Devin Charles <DRingger@willkie.com>
Sent: Wednesday, July 29, 2020 9:16 AM
To: MATTHEW, TABATHA D GS-09 USAF AETC 502 CS/SCOK <tabatha.matthew.1@us.af.mil>
Cc: Reddick, Nicholas <NReddick@willkie.com>
Subject: [Non-DoD Source] RE: Acknowledgement of FOIA 2020-02975-F

Ms. Matthew,

Thank you very much for your e-mail. We appreciate you reaching out to provide us an update on our FOIA request. However, since it appears that our request was forwarded to you from another agency, we do not actually know what FOIA request you have received and assigned FOIA #2020-02975. To that end, can you please forward us a copy of the FOIA request itself (or describe its contents) and also indicate which agency referred it to you?

Thank you very much for your assistance.

Best,
Devin

Devin Charles Ringger
Willkie Farr & Gallagher LLP
1875 K Street, N.W. | Washington, DC 20006-1238

Direct: [+1 202 303 1463](tel:+12023031463) | Fax: +1 202 303 2463
dringger@willkie.com | [vCard](#) | www.willkie.com bio
Pronouns: he, him, his

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Sent: Friday, July 17, 2020 4:06 PM
To: Ringger, Devin Charles <DRingger@willkie.com>
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Very Respectfully,

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WILLKIE FARR & GALLAGHER LLP

1875 K Street, N.W.
Washington, DC 20006-1238
Tel: 202 303 1000
Fax: 202 303 2000

Received
4 Mar 2020
USCENTCOM
FOIA 20-0260

March 2, 2020

United States Central Command J6-RDF (FOIA)
7115 South Boundary Boulevard
MacDill AFB, FL 33621-5101
Email: centcom.macdill.centcom-hq.mbx.freedom-of-information-act@mail

Re: Freedom of Information Act

To Whom It May Concern,

My firm represents over 380 American veterans, civilians, and their families in connection with deaths and injuries caused by terrorists in Afghanistan. On behalf of our clients, we filed a lawsuit against several U.S. and international contractors, alleging that they made protection payments to terrorists who killed or wounded thousands of Americans in Afghanistan. *See Cabrera et al v. Black & Veatch Special Projects Corporation et al*, Case No. 1:19-cv-03833 (D.D.C.). As part of our investigation of these allegations, and on behalf of our clients who have made great sacrifices in connection with America's involvement in Afghanistan, we submit this request under the Freedom of Information Act, 5 U.S.C. §§ 552, et seq. ("FOIA") for copies of the records described below.

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Page 3

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Sincerely,

/s/ Michael J. Gottlieb

EXHIBIT D



DEPARTMENT OF THE AIR FORCE
502D AIR BASE WING
JOINT BASE SAN ANTONIO



Colonel David W. Trotter
Vice Commander
2080 Wilson Way
JBSA-Fort Sam Houston TX 78234-7680

Michael J. Gottlieb
Willkie Farr & Gallagher LLP
1875 K St, NW
Washington, DC 20006-1238

Dear Mr. Gottlieb,

On 3 June 2020 we received Freedom of Information Act (FOIA) Request (2020-02975-F) where you requested copies of the following:

All contracts and related documentation (including RFPs, bids, show cause and cure notices, task orders, subcontracts, and audits) with "ArmorGroup North America, Inc." (CAGE Code I W7P6) or "ArmorGroup International pie" or "ArmorGroup International Limited" or "ArmorGroup Services Limited" or "G4S Risk Management Limited" of "Centerra Group, LLC" or "AGNA" or "G4S Holdings International (AG) Limited" or "G4S Government Solutions, Inc." or "Wackenhut Services, Inc." or "G4S pie" or "G4S Risk Management Limited" for projects in Afghanistan. Contracts and subcontracts include but are not limited to:

The "Shindand Airbase" Contract FA-8903-06-D-8511 awarded to ArmorGroup North American, Inc. (CAGE Code I W7P6) and Environmental Chemical Corporation (CAGE Code OTOF8) in March 2007 (Award ID FA890306D85 I IOO 18). The contract start date was March 13, 2007 and the contract end date was December 29, 2009. This contract is referred to in the U.S. Senate Committee on Armed Services, Report, Inquiry Into The Role & Oversight Of Private Security Contractors In Afghanistan, 5 (Oct. 26, 2010) available at <https://fas.org/irp/congress/2010rpt/sasc-psc.pdf>.

Based on the recommendations from the 772d Enterprise Sourcing Squadron (772 ESS), Air Force Information Mission Support Center (AFIMSC) Legal and 502d Air Base Wing (502 ABW) Legal, portions of the following FOIA request is "**Partially Denied**" and to be withheld using the following exemptions: Exemption (b)(4), Exemption (b)(5), Exemption (b)(6), and Exemption (b)(9).

Exemption (b)(4) protects "trade secrets and commercial or financial information obtained from a person that is privileged or confidential."

Exemption (b)(5) protects "inter-agency or intra-agency memorandums or letters which would not be available by law to a party ... in litigation with the agency."

Exemption (b)(6) permits the government to withhold all information about individuals in "personnel and medical files and similar files" when the disclosure of such information "would constitute a clearly unwarranted invasion of personal privacy."

Exemption (b)(9) protects "geological and geophysical information and data, including maps, concerning wells."

If you decide to appeal this decision, your appeal letter must be postmarked no later than 90 calendar days after the date of this letter. If no appeal is received, or if the appeal is postmarked after the conclusion of this 90-day period, the appeal is considered closed. Include in your appeal your reasons for reconsideration and attach a copy of this letter. Address your letter as follows:

Secretary of the Air Force
THRU: 502 CS/SCOK (FOIA)
151 J Street East, Suite 124A
JBSA-Randolph TX 78150-4342

You may contact the Air Force FOIA Public Liaison Officer, Ms. Anh Trinh, concerning this final response at Air Force FOIA Public Liaison Office, 1800 Air Force Pentagon, Washington, DC 20330-1800 or daf.foia@us.af.mil/(703) 614-8500. You may also seek dispute resolution services from the Office of Government Information Services, and can find information on this Office at <https://ogis.archives.gov/mediation-program/request-assistance.htm>. Using the dispute resolution services, will not affect your appeal or appeal rights.

If you have any questions, you can contact me at (210) 652-2186 or e-mail at tabatha.matthew.l@us.af.mil.

Sincerely

DAVID W. TROTTER, Colonel, USA
Vice Commander

Attachment:
Records (Partial Denial)