

# EXHIBIT 1



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December 20, 2017

Mr. Ryan Law  
Deputy Assistant Secretary for Privacy, Transparency, and Records  
U.S. Department of the Treasury  
Washington, DC 20220

**Re: Freedom of Information Act Request – Cham Bank S.A.**

Dear Mr. Law:

This is a request under the Freedom of Information Act (5 U.S.C. § 552).

Squire Patton Boggs (US) LLP has been retained by Cham Bank S.A. to represent it in matters related to its designation to the Specially Designated Nationals (“SDN”) List on May 16, 2017.

To that end, we respectfully request that the Department of the Treasury provide to me a redacted copy of the administrative record, in whole or in part, related to the designation of CHAM ISLAMIC BANK (a.k.a. AL-CHAM ISLAMIC BANK; a.k.a. CHAM BANK).

As used in this request, the term “record” should be given the broadest possible meaning of that term consistent with the Freedom of Information Act, and includes, but is not limited to, email correspondence, reports, and any other documents or recorded communications maintained by the Department of the Treasury including electronic, and any information maintained for the same by an entity under a Government contract.

I understand that some relevant materials may be withheld under one or more exemptions, including for information classified in the interest of national defense or foreign policy (5 U.S.C. § 552(b)(1)). In December 2009, President Barack Obama issued Executive Order (“EO”) 13526 updating guidelines for the classification, safeguard, and declassification of national security information. EO 13526 limits classification to eight categories of information whose “unauthorized disclosure could reasonably be expected to cause identifiable or describable damage to the national security,” namely:

- a) Military plans, weapons systems, or operations;
- b) Foreign government information;

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- c) Intelligence activities (including covert action), intelligence sources or methods, or cryptology;
- d) Foreign relations or foreign activities of the United States, including confidential sources;
- e) Scientific, technological, or economic matters relating to the national security;
- f) United States Government programs for safeguarding nuclear materials or facilities;
- g) Vulnerabilities or capabilities of systems, installations, infrastructures, projects, plans, or protection services relating to the national security; or
- h) The development, production, or use of weapons of mass destruction.

Information outside of these categories would therefore be improperly classified. EO 13526 prohibits the continued classification of material to "conceal violations of law, inefficiency, or administrative error" or to "prevent or delay the release of information that does not require protection in the interest of the national security."

The Freedom of Information Act also requires the release of all reasonably segregable portions of records (5 U.S.C. § 552(b)). Therefore, in the event your office withholds responsive documents under any of the Freedom of Information Act's exemptions, we request that it release portions of the withheld material to the greatest extent possible. Your office also has the discretion to release exempted information when there is no foreseeable harm in doing so and disclosure is not otherwise prohibited by law.

I appreciate your timely attention to this request, as its need is urgent. I look forward to hearing from you within 20 days on your compliance with this request, pursuant to the Freedom of Information Act's requirements (5 U.S.C. § 552(a)(6)(A)).

The category of request for fee purposes is "all other requesters." I agree to pay all fees that might be incurred. However, if you estimate that fees will exceed \$500, please inform me first.

I can also be contacted by phone at (202) 457-5651, if necessary, to discuss any aspect of my request.

Thank you for consideration of this request.

Regards,



Sincerely,

Squire Patton Boggs (US) LLP

Dan E. Waltz  
Partner