

EXHIBIT 2

SPARACINO

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December 19, 2021

VIA Online FOIA Request Portal
([https://efoia.milcloud.mil/\(S\(wmehidhazsyc21o5exrx1mdu\)\)/App/CreateRequest.aspx](https://efoia.milcloud.mil/(S(wmehidhazsyc21o5exrx1mdu))/App/CreateRequest.aspx))

ATTN: USAFCENT FOIA Office
611 Lark Road
Building 1941
Shaw AFB, SC 29142
AFCENT.FOIA@AFCENT.AF.MIL

RE: Freedom of Information Act Request

Dear USAFCENT FOIA Office,

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

My firm, along with Willkie Farr & Gallagher LLP, represents over 700 American veterans, civilians, and their families in connection with deaths and injuries caused by terrorists in Iraq. On behalf of our clients, we filed a lawsuit against the Islamic Republic of Iran, alleging that Iran and its agents provided material support and resources to terrorists who killed or wounded our clients (the “attack victims”) in Iraq. *See Martino et al. v. Islamic Republic of Iran*, Docket No. 1:21-cv-01808 (D.D.C. Jul. 07, 2021) (“*Martino*”). 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 Iraq, we submit this request (“*Martino* Request”).

For the attack in which the below listed Airman was killed, and, to the extent that the Air Force may have within its control valuable information pertaining to the attacks and the civilian government contractors listed in the attached chart (“Attachment A: Civilian Attack Victim List”), we request any and all related formal or informal reports, records, files, products, investigations, memoranda, summaries, related correspondence, or other documents, including but not limited to:

- a. Significant Activity (“SIGACT”) Reports;
- b. Commander’s Situational Reports (“SITREP”);
- c. After-Action Reports (“AAR”) or Unit After-Action Reports (“Unit AAR”);
- d. Serious Incident Reports (“SIR”);
- e. Criminal or Administrative Investigation Reports, Summaries, Memoranda, and/or related attachments or supporting documentation;
- f. Fatality Investigation Reports, Summaries, Memoranda, and/or related attachments or supporting documentation;
- g. IED or other explosives/weapons Reports;
- h. IED-Event or other explosives/weapons Storyboards;
- i. CIDNE Reports;

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- j. Incident and Operational Reports (“OPREP”);
- k. Battle Damage Assessment Reports (“BDAREP”);
- l. Explosive Ordnance Disposal (“EOD”) Reports;
- m. Weapons Intelligence Teams (“WIT”) Reports;
- n. Combined Explosives Exploitation Cell (“CEXC”) Reports;
- o. Terrorist Explosive Device Analytical Center (“TEDAC”) Reports;
- p. Task Force Troy Reports;
- q. Line of Duty (“LOD) Investigation Reports/Determinations;
- r. Real-Time Regional Gateway (“RTRG”) Reports;
- s. Lessons Learned Reports;
- t. Preliminary Inquiry Reports;
- u. Casualty Reports;
- v. Sworn Statements

For the below listed Airman, we request that the Agency assign a FOIA number to the request and include the FOIA number in the Agency’s reply.

Airman’s Last Name:	Holt
Airman’s First Name:	Antoine
Airman’s Middle Initial:	J.
Airman’s Date of Birth:	06/13/1983
Airman’s Rank:	Airman First Class
Airman’s Squadron:	603rd Air Control Squadron
Date of Incident:	04/10/2004
Location of Incident:	Saladin, Iraq
Assigned FOIA Number:	_____

For each civilian attack victim in the attached chart, we include the below listed information, as well as one blank cell for the Agency to assign a FOIA number for the request, and we request that each FOIA number be included in the Agency’s reply. The attached chart includes the following information regarding each attack victim and pertinent attack:

Last Name
 First Name
 Middle Name/Initial
 Date of Birth
 Branch or Employer
 Date of Incident
 Location of Incident
 Other Known Attack Victims (for civilian government contractors killed in attacks in which service members were also killed)

In order to help you determine our status for the purpose of assessing fees, please take notice that we are counsel for the attack victims and/or their families in federal litigation currently pending before the U.S. District Court for the District of Columbia in *Martino et al. v. Islamic Republic of Iran*,

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Docket No. 1:21-cv-01808 (D.D.C. Jul. 07, 2021). Your expedited treatment of this FOIA request is appreciated, as these materials are relevant to pending claims in this litigation.

I am willing to pay fees for this request up to a maximum of \$250. If you estimate that fees will exceed this limit, please inform my office prior to incurring additional costs. 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.

Please search for responsive records regardless of format, medium, or physical characteristics. 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. 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. 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."

To discuss any aspect of this request, please contact both of my co-counsels from Willkie Farr & Gallagher LLP, Nick Reddick ((415) 858-7595, or via email at NReddick@willkie.com) and Timothy Ryan ((202) 303-1183, or via email at TRyan@willkie.com).

Best Regards,

Ryan E. Sparacino

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Washington, DC 20036

Tel: (202) 629-3530

Ryan.sparacino@sparacinopllc.com

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Attachment: Civilian Attack Victim List

Last Name	First Name	Middle Name/Initial	D.O.B.	Status (Military or Civilian)	Branch or Employer	Date of Incident	Location of Incident	KIA/WIA	Other Known Attack Victims	Agency- Assigned FOIA #
Bell	Timothy	E.	4/26/1959	Civilian government contractor	Kellogg, Brown & Root	4/9/2004	Baghdad	KIA	Sgt. Elmer C. Krause, U.S. Army Reserves, 724th Transportation Company; Pfc. Gregory R. Goodrich, U.S. Army Reserves, 724th Transportation Company; SSgt. Keith Maupin, U.S. Army Reserves, 724th Transportation Company	
Casavant	Casey		6/8/1970	Civilian government contractor	Blackwater	1/23/2007	Baghdad	KIA		
Gernet	Steven	A.	5/9/1964	Civilian government contractor	Blackwater	1/23/2007	Baghdad	KIA		
Hulett	Stephen			Civilian government contractor	Kellogg, Brown & Root	4/9/2004	Baghdad	KIA	Sgt. Elmer C. Krause, U.S. Army Reserves, 724th Transportation Company; Pfc. Gregory R. Goodrich, U.S. Army Reserves, 724th Transportation Company; SSgt. Keith Maupin, U.S. Army Reserves, 724th Transportation Company	
Iversen	Aaron	Thomas	10/24/1966	Civilian government contractor	EOD Technology. Inc.	11/9/2004	Al Anbar	KIA		
Johnson	Ronald		10/16/1961	Civilian government contractor	Blackwater	1/23/2007	Baghdad	KIA		

Johnson	Tony	Duane	1/22/1956	Civilian government contractor	Kellogg, Brown & Root	4/9/2004	Baghdad	KIA	Sgt. Elmer C. Krause, U.S. Army Reserves, 724th Transportation Company; Pfc. Gregory R. Goodrich, U.S. Army Reserves, 724th Transportation Company; SSgt. Keith Maupin, U.S. Army Reserves, 724th Transportation Company
Laguna	Arthur		8/10/1954	Civilian government contractor	Blackwater	1/23/2007	Baghdad	KIA	
Montague	Jack	A.	9/12/1951	Civilian government contractor	Kellogg, Brown & Root	4/9/2004	Baghdad	KIA	Sgt. Elmer C. Krause, U.S. Army Reserves, 724th Transportation Company; Pfc. Gregory R. Goodrich, U.S. Army Reserves, 724th Transportation Company; SSgt. Keith Maupin, U.S. Army Reserves, 724th Transportation Company
Pinsonneault	John	Albert	4/2/1965	Civilian government contractor	Dyncorp	10/14/2004	Baghdad	KIA	
Teague	Michael			Civilian government contractor	Blackwater Security	3/31/2004	Al Anbar	KIA	
Zovko	Jerko		10/26/1972	Civilian government contractor	Blackwater Security	3/31/2004	Al Anbar	KIA	

Martino v. Iran FOIA Request - Air Force Attack Victim List

Last Name	First Name	Middle Name/Initial	Suffix	Date of Birth	Rank	Status (Military or Civilian)	Branch or Employer	Company/Unit	Date of Incident	Location of Incident	KIA/WIA	Agency-Assigned FOIA #
Holt	Antoine	J.		6/13/1983	Airman First Class	Military	U.S. Air Force	603rd Air Control Squadron	4/10/2004	Saladin	KIA	

Martino v. Iran FOIA Request - Civilian Attack Victim List

Last Name	First Name	Middle Name/Initial	Suffix	Status (Military or Civilian)	Branch or Employer	Date of Incident	Location of Incident	KIA/WIA	Other Known Attack Victims	Agency-Assigned FOIA #
Bell	Timothy	E.		Civilian government contractor	Kellogg, Brown & Root	4/9/2004	Baghdad	KIA	Sgt. Elmer C. Krause, U.S. Army Reserves, 724th Transportation Company; Pfc. Gregory R. Goodrich, U.S. Army Reserves, 724th Transportation Company; SSgt. Keith Maupin, U.S. Army Reserves, 724th Transportation Company	
Casavant	Casey			Civilian government contractor	Blackwater	1/23/2007	Baghdad	KIA		
Gernet	Steven	A.		Civilian government contractor	Blackwater	1/23/2007	Baghdad	KIA		
Hulett	Stephen			Civilian government contractor	Kellogg, Brown & Root	4/9/2004	Baghdad	KIA	Sgt. Elmer C. Krause, U.S. Army Reserves, 724th Transportation Company; Pfc. Gregory R. Goodrich, U.S. Army Reserves, 724th Transportation Company; SSgt. Keith Maupin, U.S. Army Reserves, 724th Transportation Company	
Iversen	Aaron	Thomas		Civilian government contractor	EOD Technology, Inc.	11/9/2004	Al Anbar	KIA		
Johnson	Ronald			Civilian government contractor	Blackwater	1/23/2007	Baghdad	KIA		
Johnson	Tony	Duane		Civilian government contractor	Kellogg, Brown & Root	4/9/2004	Baghdad	KIA	Sgt. Elmer C. Krause, U.S. Army Reserves, 724th Transportation Company; Pfc. Gregory R. Goodrich, U.S. Army Reserves, 724th Transportation Company; SSgt. Keith Maupin, U.S. Army Reserves, 724th Transportation Company	
Laguna	Arthur			Civilian government contractor	Blackwater	1/23/2007	Baghdad	KIA		
Montague	Jack	A.		Civilian government contractor	Kellogg, Brown & Root	4/9/2004	Baghdad	KIA	Sgt. Elmer C. Krause, U.S. Army Reserves, 724th Transportation Company; Pfc. Gregory R. Goodrich, U.S. Army Reserves, 724th Transportation Company; SSgt. Keith Maupin, U.S. Army Reserves, 724th Transportation Company	
Pinsonneault	John	Albert		Civilian government contractor	Dyncorp	10/14/2004	Baghdad	KIA		
Teague	Michael			Civilian government contractor	Blackwater Security	3/31/2004	Al Anbar	KIA		
Zovko	Jerko			Civilian government contractor	Blackwater Security	3/31/2004	Al Anbar	KIA		

From: [Air Force FOIA Requester Service Center](#)
To: [Conlon, Nicholas](#)
Subject: Status Update for Request #2022-01162-F
Date: Monday, December 20, 2021 4:34:17 PM

***** EXTERNAL EMAIL *****

Dear Nicholas Conlon,

The status of your FOIA request #2022-01162-F has been updated to the following status 'Received'. To log into the PAL Application click on the Application URL below.

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

Sincerely,
Air Force FOIA Requester Service Center