

# EXHIBIT A

1250 Connecticut Avenue, NW  
Suite 700  
Washington, D.C. 20036

202-600-4996

Fax 202-545-6318

Info@NationalSecurityLawFirm.com

*\*Admitted in New Jersey, New York, Hawaii, California, Ohio, and Washington D.C*

February 3, 2022

**Via Email usarmy.meade.902-mi-grp.mbx.inscom-foia-service-center@mail.mil**

Department of the Army  
United States Army Intelligence and Security Command  
Freedom of Information/Privacy Office  
Fort George G. Meade, MD 20755-5995

RE: Our Client: Bryan A. Cheeseman

SS#:xxx-xx-xxxx

Revocation of Security Clearance for Classified Information

Dear Sir/Madam:

Please be advised that I have been retained to represent Bryan A. Cheeseman. On his behalf, I am requesting all records pertaining to Mr. Cheeseman held by the United States Army Intelligence and Security Command. As a point of reference, please find attached a letter received by the Defense Counterintelligence and Security Agency dated February 1, 2022 in response to our original FOIA request to them of January 14, 2022. As noted, records were located within your Agency but could not be released as they lacked authority. (February 1, 2022 letter attached - DCSA-M-22-02960)

**I am forwarding this letter as an expedited request for processing. Please note that our office requires the expedited request under the expedited processing regulation noted as (iii) the loss of substantive due process rights.**

**Description of Records Sought:**

- 1) All interagency and intra-agency correspondence pertaining to the above.
- 2) All interagency and intra-agency records related to the individual.
- 3) All investigation and standard forms pertaining to the above.
- 4) Complete copy of investigative interview with the U.S. Army Intelligence and Security Command.
- 5) **All records held by INSCOM and their subordinate units including but not limited to AOG. If it is determined that any of the documents are classified, we are requesting an immediate declassification review.**

**Bryan A. Cheeseman's verification of identity:**

Full Name: Bryan A. Cheeseman

Social Security No: xxx-xx-xxxx

Date of Birth: [REDACTED]

[REDACTED]

**[REDACTED] pay fees:**

My office agrees to pay all applicable fees in accordance with federal law.

**Preferred delivery method:**

Please send all disclosures to 1250 Connecticut Avenue, Suite 700, Washington, DC 20036

**Bryan A. Cheeseman's authorization for release:**

I authorize information pertaining to me to be released to the National Security Law Firm, my legal counsel in this matter. I understand that I will not be furnished a duplicate copy of any disclosures. Pursuant to 5 USC 552a(b), I authorize the the Department of Defense to release my records to the National Security Law Firm.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, that I am the person described above. I understand that any falsification of this statement is punishable under the provisions of 18 USC 1001 by a fine of not more than \$10,000, or by imprisonment for not more than five years or both, and that requesting or obtaining any record(s) under false pretenses is punishable under the provisions of 5 USC 552a(i)(3) by a fine of not more than \$5,000.



\_\_\_\_\_  
Bryan A. Cheeseman

04 Feb 2022

\_\_\_\_\_  
Date

I hereby certify that the foregoing statements made by me in this request are true and correct. I am aware that if any statement made by me is willfully false, I am subject to punishment. **I would ask that you grant our request for the expedited processing on the aforementioned FOIA request.** Thank you for your assistance in this matter.

Very truly yours,  
*Brett John O'Brien*  
Brett John O'Brien

BO/yml

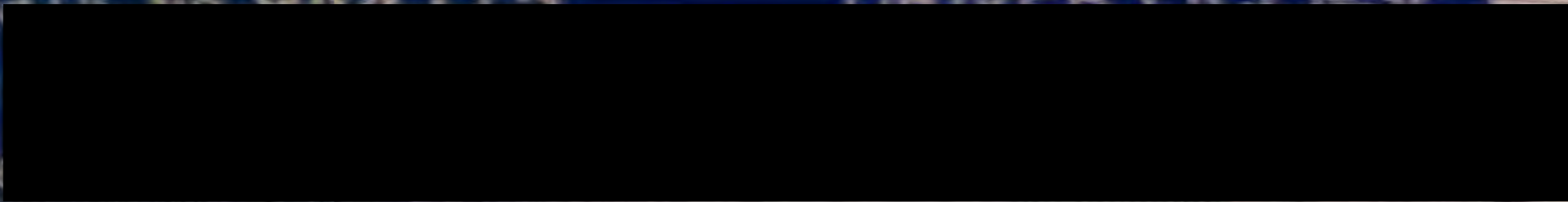
Cc: Bryan A. Cheeseman

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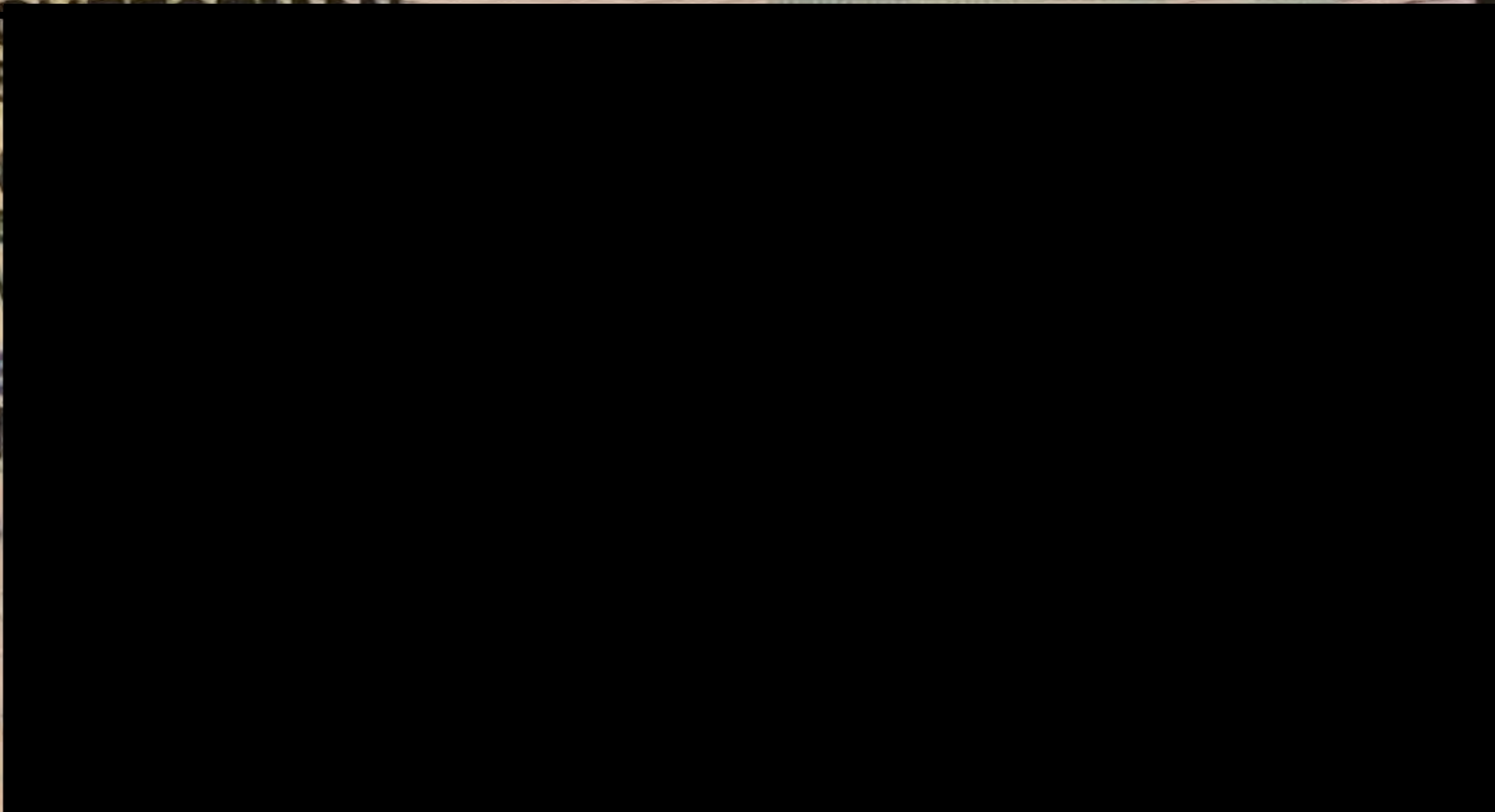
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*Ben Aron*



**DEFENSE COUNTERINTELLIGENCE AND SECURITY AGENCY**

**27130 TELEGRAPH ROAD  
QUANTICO, VA 22134-2253**

February 1, 2022  
DCSA-M 22-02960

Mr. Bryan A. Cheeseman  
4 Michigan State Drive  
Newark, DE 19713

Dear Mr. Cheeseman:

This is in response to your January 14, 2022, request for a copy of the records pertaining to you, which the Department of Defense Consolidated Adjudications Facility (DoD CAF) relied upon in its preliminary decision to deny/revoke your security eligibility, pursuant to DoDM 5200.02. Your request was received on January 21, 2022. Attached is a list of the pertinent documents, which the DoD CAF relied upon to create the Statement of Reasons (SOR) dated January 11, 2022, and the respective release authority for each document.

Record(s) responsive to your request, which fall under the release authority of the United States Army Intelligence and Security Command were located. We do not have release authority for those record(s); thus, we are referring your request and responsive record(s) to their Privacy Office(s), for action and direct response to you.

If you have questions concerning the processing of this request, you may contact the HQ DCSA FOIA Office by emailing [dcsa.quantico.dcsa-hq.mbx.foia@mail.mil](mailto:dcsa.quantico.dcsa-hq.mbx.foia@mail.mil). We hope this information is helpful, and appreciate the opportunity to assist you in this matter.

Sincerely,

Joy F. Greene  
Chief, FOI/PA Office for Adjudications  
Defense Counterintelligence and Security Agency

Attachment(s):  
As stated

RE: DCSA-M 22-02960

List of pertinent documents of the DoD CAF Memorandum dated January 11, 2022, “Subject: Intent to Revoke Eligibility for Access to Classified Information, and/or Assignment to Duties that have been Designated National Security Sensitive,” and respective release authority:

**U.S. Army INSCOM:**

- Department of the Army Memorandum, Letter of Transmittal, September 5, 2015

Attachment(s)