

# EXHIBIT C

**National Security Law Firm**

1250 Connecticut Avenue, NW

Suite 700

Washington, D.C. 20036

202-600-4996

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Info@NationalSecurityLawFirm.com

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

February 28, 2022

**Via Email [usarmy.meade.902-mi-grp.mbx.inscom-foia-service-center@mail.mil](mailto: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 [REDACTED]

[REDACTED]-22

Revocation of Security Clearance for Classified Information

Dear Sir/Madam:

Please be advised that this office represents Bryan Cheeseman in connection with a revocation of security clearance for classified information. We are in receipt of your letter dated February 16, 2022 and attached hereto for reference (Exhibit A).

On February 7, 2022, our office forwarded an expedited FOIA request to your offices for copies of the entire investigative file on an expedited basis. A copy of our original FOIA request is attached. (Exhibit B). Attached to your letter of February 16, 2022 were four pages of materials in response to our FOIA request. (Exhibit C).

The attached FOIA requests the underlying materials on an expedited basis under regulation (iii) the loss of substantial due process rights. Currently, the response due date for Mr. Cheeseman's suitability review denial is April 11, 2022.

In light of the due date for our client's review submission, as well as the continued COVID-19 pandemic, it is imperative that our office receive these documents in order to properly represent our client's interests.

There are exceptions to the regular FOIA request procedure which grants the ability for an individual to request expedited processing. One of those exceptions is **(iii) the loss of substantial due process rights**. This is one of the factors to be considered by an agency when granting the expedited request.

Our client will be placed in a precarious situation wherein he is unable to view the material which was utilized in the determination to revoke his security clearance. Therefore his due process rights have, in fact, been substantially affected.

We are providing additional information to assist with the search:

1. All documents acquired from any source that mention or refer to Mr. Bryan Cheeseman or any operational name or source number assigned to him;
2. All intelligence reports, contact reports, source documents, operational proposals, Concept of Operations (CONOP), taskers, psychological assessment, or guidance related to Mr. Bryan Cheeseman or any operational name or source number assigned to him;
3. All monetary expenditures and related reports involving Emergency and Extraordinary Expenses (EEE) pursuant to 10 U.S.C. § 127 and Mr. Bryan Cheeseman;
4. All emails between Army Intelligence Soldiers and/or employees that mention Mr. Bryan Cheeseman or any operational name or source number assigned to him; (please note Mr. Cheeseman's email addresses as follows to assist in your search):  
NIPR: bryan.a.cheeseman.civ@mail.mil bryan.cheeseman@us.army.mil  
bcheesem@arl.army.mil  
SIPR:  
bryan.a.cheeseman.civ@mail.smil.mil; bcheesem@arl.army.smil.mil
5. All aforementioned requests refer to any responsive information saved, collected, retained, stored, retired, possessed by but not limited to the Army, G2, and/or INSCOM.
6. We continue to request that if any of the documents are classified, there is an immediate declassification review.

We are therefore requesting that our expedited FOIA request be granted and the entirety of the underlying materials forwarded as provided by statute.

If you wish to discuss this matter further, please do not hesitate to contact the undersigned.

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

BO/yml

Cc: Bryan A. Cheeseman



**DEPARTMENT OF THE ARMY**  
**UNITED STATES ARMY INTELLIGENCE AND SECURITY COMMAND**  
**FREEDOM OF INFORMATION/PRIVACY OFFICE**  
**FORT GEORGE G. MEADE, MARYLAND 20755-5995**

February 16, 2022

Freedom of Information/  
Privacy Office

Mr. Brett J. O'Brien  
National Security Law Firm  
1250 Connecticut Avenue, Suite 700  
Washington, D.C. 20036

Dear Mr. O'Brien:

This responds to your Privacy Act (PA) request of February 3, 2022, on behalf of your client, Mr. Bryan A. Cheeseman, for all records pertaining to Mr. Cheeseman held by the United States Army Intelligence and Security Command. Mr. Cheeseman's request was received in this office on February 7, 2022.

To determine the existence of Army intelligence investigative records responsive to Mr. Cheeseman's request, a check was made of all relevant U.S. Army Intelligence and Security Command (INSCOM) holdings, which disclosed an Army intelligence investigative record.

Mr. Cheeseman's Army intelligence investigative record was retrieved from a system of records by use of his personal identifying data. The record was processed under the PA and is enclosed.

We have completed a mandatory declassification review in accordance with Executive Order (EO) 13526. As a result of our review, it has been determined that the information contained in the record no longer warrants security classification protection and is partially releasable to Mr. Cheeseman.

Information has been sanitized that would result in an unwarranted invasion of the privacy rights of the individuals concerned. This information is exempt from the public disclosure provisions of the Freedom of Information Act (FOIA) pursuant to Title 5 U.S. Code 552 (b)(6) and (b)(7)(c). (See attached appeal rights).

Information also has been sanitized under the provisions of Title 5 U.S. Code 552(a)(k)(2) of the PA and Title 5 U.S. Code 552 (b)(3) and (b)(7)(e) of the FOIA. Exemptions (k)(2) of the PA and (b)(7)(e) of the FOIA protect information which would reveal sensitive intelligence methods and techniques and reveal sensitive intelligence methods that are predominantly internal in nature; the disclosure of which would significantly risk circumvention of agency regulations or statutes. Exemption (b)(3) of the FOIA pertains to information that is exempt by statute. The applicable statute is 50 U.S.C § 3024(i), which protects intelligence sources and methods.

-2-

If Mr. Cheeseman has any questions regarding this action, he may contact this office at 1-866-548-5651, or email the INSCOM FOIA office at: [usarmy.meade.902-mi-grp.mbx.inscom-foia-service-center@mail.mil](mailto:usarmy.meade.902-mi-grp.mbx.inscom-foia-service-center@mail.mil) and refer to case #0126P-22. Please note that Mr. Cheeseman now has the ability to check the status of his request online via the U.S. Army Records Management and Declassification Agency (RMDA) website: <https://www.foia.army.mil/FACTS/CaseStatus.aspx>. Mr. Cheesman should refer to FOIA Control Number: FP-22-010253. If Mr. Cheeseman has any questions or wishes to discuss reformulation or an alternative time frame for the processing of his request, he may contact our FOIA Public Liaison, Mrs. Joanne Benear, for any further assistance and to discuss any aspect of his request at 301-677-7856. Additionally, Mr. Cheeseman may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, email at [ogis@nara.gov](mailto:ogis@nara.gov), telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

Sincerely,

HEATON.MICH  
AEL.TODD.1160  
922075

Digitally signed by  
HEATON.MICHAEL.TODD.1  
160922075  
Date: 2022.02.16 11:14:54  
-05'00'

Michael T. Heaton

Director

Freedom of Information/Privacy Office  
Investigative Records Repository

Enclosure

## DENIAL APPEAL RIGHTS

On occasion, we remove portions of records that identify our personnel and third parties so as to protect their privacy. We deny release and/or portions of records which are currently and properly classified.

"No record" responses and partial or full denial responses are made on behalf of The Deputy Chief of Staff, G-2, who is the Denial Authority for Army intelligence investigative and security records under the Privacy Act and Major General Michele H. Bredenkamp, Commander, U.S. Army Intelligence and Security Command, who is the Initial Denial Authority for Army intelligence investigative and security records under the Freedom of Information Act and may be appealed to the Secretary of the Army. If you decide to appeal at this time, your appeal must be post marked no later than 90 calendar days from the date of our letter. After the 90-day period, the case may be considered closed; however, such closure does not preclude you from filing litigation in the courts. You should state the basis for your disagreement with the response and you should provide justification for an additional administrative search to be conducted or reconsideration of the denial. An appeal may not serve as a request for additional or new information. An appeal may only address information denied in this response. Your appeal is to be made to this office to the below listed address for forwarding, as appropriate, to the Secretary of the Army, Office of the General Counsel.

Commander  
U.S. Army Intelligence and Security Command  
Freedom of Information/Privacy Office  
(APPEAL)  
2600 Ernie Pyle Street, Room 3S02B  
Fort George G. Meade, Maryland 20755-5995

### Explanation of FOIA/PA Exemptions

#### Subsections of Title 5, United States Code, Section 552

- (b)(1) (A) Specifically authorized under criteria established by an Executive order to be kept secret in the interest of national defense or foreign policy and (B) are in fact properly classified to such Executive order;
- (b)(2) Related solely to the internal personnel rules and practices of an agency;
- (b)(3) Specifically exempted from disclosure by statute (other than section 552b of this title), provided that such statute(A) requires that the matters be withheld from the public in such a manner as to leave no discretion on issue, or (B) establishes particular criteria for withholding or refers to particular types of matters to be withheld;
- (b)(4) Trade secrets and commercial or financial information obtained from a person and privileged or confidential;
- (b)(5) Inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than an agency in litigation with the agency;
- (b)(6) Personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy;
- (b)(7) records or information compiled for law enforcement purposes, but only to the extent that the production of such law enforcement records or information ( A ) could be reasonably be expected to interfere with enforcement proceedings, ( B ) would deprive a person of a right to a fair trial or an impartial adjudication, ( C ) could be reasonably expected to constitute an unwarranted invasion of personal privacy, ( D ) could reasonably be expected to disclose the identity of confidential source, including a State, local, or foreign agency or authority or any private institution which furnished information on a confidential basis, and, in the case of record or information compiled by a criminal law enforcement authority in the course of a criminal investigation, or by an agency conducting a lawful national security intelligence investigation, information furnished by a confidential source, ( E ) would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law, or ( F ) could reasonably be expected to endanger the life or physical safety of any individual;
- (b)(8) contained in or related to examination, operating, or condition reports prepared by, on behalf of, or for the use of an agency responsible for the regulation or supervision of financial institutions; or
- (b)(9) Geological and geophysical information and data, including maps, concerning wells.

#### Subsections of Title 15, United States Code, Section 552a

- (d)(5) Information compiled in reasonable anticipation of a civil action proceeding;
- (j)(2) Material reporting investigative efforts pertaining to the enforcement of criminal law including efforts to prevent, control, or reduce crime or apprehend criminals;
- (k)(1) Information which is currently and properly classified pursuant to an Executive order in the interest of the national defense or foreign policy, for example, information involving intelligence sources or methods;
- (k)(2) investigatory material compiled for law enforcement purposes, other than criminal, which did not result in loss of a right, benefit or privilege under Federal programs, or which would identify a source who furnished information pursuant to a promise that his/her identity would be held in confidence;
- (k)(3) Material maintained in connection with providing protective services to the President of the United States or any other individual pursuant to the authority of Title 18, United States Code, Section 3056;
- (k)(4) Required by statute to be maintained and used solely as statistical records;
- (k)(5) Investigatory material compiled solely for the purpose of determining suitability, eligibility, or qualifications for Federal civilian employment or for access to classified information, the disclosure of which would reveal the identity of the person who furnished information pursuant to a promise that his/her identity would be held in confidence;
- (k)(6) Testing or examination material used to determine individual qualifications for appointment or promotion in Federal Government service the release of which would compromise the testing or examination process;
- (k)(7) Material used to determine potential for promotion in the armed services, the disclosure of which would reveal the identity of the person who furnished the material pursuant to a promise that his/her identity would be held in confidence.

**UNCLASSIFIED**  
**SECRET//NOFORN**

Regraded UNCLASSIFIED on  
**10 FEB 2022**  
by USAINSCOM FOI/PA  
Auth Encl 5, para 1-d, DOD 5200-01-V1



**DEPARTMENT OF THE ARMY**  
**902D MILITARY INTELLIGENCE GROUP**  
**2600 ERNIE PYLE STREET**  
**FORT GEORGE G. MEADE, MD 20755-5910**

IAMG-OP-CONUS-CICA

26 February 2019

**SUBJECT: Letter of Transmittal**

**1. (U) References:**

a. (U) AR 381-20 (Army Counterintelligence Program), 27 May 10 ~~(S//NF)~~

b. (U) AR 25-400-2 (the Army Records Information Management System) 2 Oct 07 (U).

**2. (U//FOUO) Efforts were made to obtain the exhibits and or original signature for the attached document/s met with negative results. The documents were unavailable for uploading in the IRR or the originator of the report was unavailable to sign.**

**4. (U) The point of contact for this request is [b6] CCICA Desk Officer, at [b6]**

**b6**

Chief, CONUS-CICA

**REGRADE UNCLASSIFIED FOR OFFICIAL USE ONLY WHEN SEPARATED FROM CLASSIFIED ENCLOSURE**

CLASSIFIED BY: [b6] & (b)(7)(c)  
DERIVED FROM: US Army CI SCG, 1 Jun 2017  
DECLASSIFY ON: 20440226

**SECRET//NOFORN**  
**UNCLASSIFIED**



UNCLASSIFIED  
SECRET//NOFORN



REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
ABERDEEN PROVING GROUND FIELD OFFICE  
4727 DEER CREEK LOOP  
ABERDEEN PROVING GROUND, MD 21005

IAMG-B-AN (381-20p)

19 June 2015

MEMORANDUM FOR

COMMANDER, USAINSCOM, ATTN: IAOP-CHS-CA, 8825 BEULAH STREET, FORT  
BELVOIR, VA 22060-5246  
COMMANDER, 902D MILITARY INTELLIGENCE GROUP, ATTN: IAMG-OP-INV,  
FORT MEADE, MD 20755-5910  
COMMANDER, FOREIGN COUNTERINTELLIGENCE ACTIVITY, ATTN: IAMG-FCA,  
FORT MEADE, MD 20755-5955

(U)  
SUBJECT: ~~(S//NF)~~ Aberdeen Proving Ground, MD  
2 March 2015

(U) LCCN: (b)(6) & (b)(7)(c)

(U)  
1. ~~(S//NF)~~ SUMMARY: A Department of the Army Civilian employee had unauthorized and unreported contact with an official representative of the (k)(2) & (b)(7)(E) b3 at an off-post Cleared Defense Contractor's (CDC). DRU: US Army Military Materiel Command; Technology Involved: (k)(2) & (b)(7)(E) b3; Mission Area: Security Related Incident; Case Category: Contact Violation; Probability of FIS/FTO Involvement: Confirmed; Anomalies: None.

2. (U) DATE OF INCIDENT: 17 February 2015 and 2 March 2015

3. (U) LOCATION OF INCIDENT: Aberdeen Proving Ground, MD.

4. (U) PERSONS INVOLVED:

(U)  
a. ~~(S//NF)~~ SUBJECTS

(U)  
(1) ~~(S//NF)~~ SUBJECT 1: (k)(2) & (b)(7)(E) b3 b6 Known Intelligence Officer.

(U)  
(2) ~~(S//NF)~~ SUBJECT 2: (k)(2) & (b)(7)(E) b3 b6  
(k)(2) & (b)(7)(E) b3

(U)  
(3) ~~(S//NF)~~ SUBJECT 3: CHEESEMAN, Bryan A.; CIV; SSN: 222-66-7212, DOB: 22 February 1969; Duty Position: Mechanical Engineer, Team Lead, Rapid Technology Transition Team, Materials Manufacturing Technology Branch, Materials and Manufacturing Science Division, Weapons and Materials Research Directorate; U.S. Army Research Laboratory (ARL), Building 4600 Deer Creek Loop, Aberdeen Proving Ground, Maryland 21005; Work Phone:

CLASSIFIED BY: (b)(6) & (b)(7)(c)  
DERIVED FROM: ARMY CI SCG, 28 JULY 11  
DECLASSIFY ON: 20400619

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UNCLASSIFIED

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10 FEB 2022  
by USAINSCOM FOI/PA  
Auth Encl 5, para 1-d, DOD 5200-01-V1

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IAMG-B-AN (381-20p)  
SUBJECT: ~~(S//NF)~~ Aberdeen Proving Ground, MD  
(U) 2 March 2014  
(U) LCCN: (b)(6) & (b)(7)(c)

(410) 306-2235; Work Email: bryan.a.cheeseman.civ@mail.mil,  
bryan.a.cheeseman.civ@mail.smil.mil; Personal Email: bcheese111@gmail.com; Security  
Clearance: SECRET..

(U)

b. ~~(S//NF)~~ SOURCES:

(U)

(1) ~~(S//NF)~~ Source 1: (b6) Intelligence & Security  
Division, ARL, Building 433, Aberdeen Proving Ground, MD 21005; Work Telephone: (b6)  
(b6) Work Email: (b6) civ@mail.mil.

(U)

(1) ~~(S//NF)~~ Source 2: (b6) Security & Intelligence  
Division, ARL, Building 433, Aberdeen Proving Ground, MD 21005; Work Telephone: (b6)  
(b6) Work Email: (b6) civ@mail.mil.

c. ~~(U//FOUO)~~ WITNESSES: None.

d. (U) OTHERS KNOWLEDGABLE: (b)(6) & (b)(7)(c) (k)(2) & (b)(7)(E) b3

5. (U) NARRATIVE:

SOURCES HAD NO OBJECTION TO THEIR IDENTITIES BEING RELEASED

(U)

a. ~~(S//NF)~~ Over an extended period, SUBJECT 3 has been routinely debriefed regarding  
HIS contacts with official foreign government visitors to ARL and following HIS official foreign  
travel resulting from HIS work on an official Data Exchange Agreement (k)(2) & (b)(7)(E) b3

(U)

b. ~~(S//NF)~~ On 12 February 2015, SUBJECT 3 walked into APGFO to report ARL had  
recently declined a visit from (S)(2) & (b)(7)(E) b3 delegation, NFI, to APG. SUBJECT 3 claimed the  
reason for the cancellation was because a member of the delegation was a known intelligence  
officer, NFI. The SUBJECT 3 insisted the visit would be important for ARL as (S)(2) & (b)(7)(E) b3  
delegation wanted to discuss (k)(2) & (b)(7)(E) b3  
vehicles. SUBJECT 3 requested APGFO contact ARL security in order to persuade ARL to  
allow the visit to occur. APGFO informed SUBJECT 3 it could not approve or deny visits to  
APG.

(U)

c. ~~(S//NF)~~ On 12 March 2015, SUBJECT 3 contacted APGFO, via telephone, to report HIS  
contacts (S)(2) & (b)(7)(E) b3 nationals and indicated the cancelled meeting HE mentioned to APGFO on  
12 February 2015 was moved to an off-post Cleared Defense Contractor's (CDC) office, (S)(2) & (b)(7)(E) b3  
(k)(2) & (b)(7)(E) b3 NFI.

(U)

d. ~~(S//NF)~~ On 13 March 2015, SUBJECT 3 met with APGFO to discuss the meetings HE  
mentioned the day prior. SUBJECT 2 met with the following individuals (S)(2) & (b)(7)(E) b3 on 17 February  
2015: (k)(2) & (b)(7)(E) b3 b6 NFI.  
SUBJECT indicated HE had a two hour discussion concerning (k)(2) & (b)(7)(E) b3

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UNCLASSIFIED

UNCLASSIFIED  
~~SECRET//NOFORN~~Regraded UNCLASSIFIED on  
10 FEB 2022  
by USAINSCOM FOI/PA  
Auth Encl 5, para 1-d, DOD 5200-01-V1

IAMG-B-AN (381-20p)

SUBJECT: ~~(S//NF)~~ Aberdeen Proving Ground, MD

(U) 2 March 2014

(U) LCCN: (b)(6) &amp; (b)(7)(c)

with (b)(2) & (b)(7)(E) b3 members. SUBJECT 2 did not note any indicators of elicitation by (b)(2) & (b)(7)(E) b3 members because the chief concern was (b)(2) & (b)(7)(E) b3 integrate (k)(2) & (b)(7)(E) b3. The second meeting with (k)(2) & (b)(7)(E) b3 occurred on 2 March 2015, which the SUBJECT 3 stated was very similar to HIS 17 February 2015 meeting. SUBJECT 3 stated only (k)(2) & (b)(7)(E) b3 b6 were present. SUBJECT 3 had a scheduled follow on meeting (b)(2) & (b)(7)(E) b3 on 18 March 2015 (APGFO made several attempts to verify whether this meeting occurred. SUBJECT 3 had been unresponsive). SUBJECT 3 also mentioned HE was attending a trip (b)(2) & (b)(7)(E) b3 in late March 2015, with ARL leadership, at the request of (k)(2) & (b)(7)(E) b3 b6 (k)(2) & (b)(7)(E) b3 b6 gov, NFI. For this trip, HE was asked by (k)(2) & (b)(7)(E) b3 b6 to a dinner. SUBJECT 3 claimed HE denied the offer.

(U)

e. ~~(S//NF)~~ On 8 May 2015, APGFO met with b6 ascertain information concerning SUBJECT 3'S contact (b)(2) & (b)(7)(E) b3 foreign nationals. b6 indicated His office did not authorize nor did His office have knowledge of SUBJECT 3 meeting (k)(2) & (b)(7)(E) b3 nationals at an off-post CDC office. ARL employees are supposed to provide Foreign Contact Reports (FCR) to b6 office after having contact with foreign nationals; however, b6 not received any FCRs from SUBJECT 3. Furthermore, b6 that no one outside of His office can authorize a visit or meeting, especially when foreign nationals are involved, once it has been cancelled or disapproved. Concerning SUBJECT 3'S trip late March 2015 trip (k)(2) & (b)(7)(E) b3 b6 was unaware of SUBJECT 3'S claim that HE was traveling with an ARL delegation.

(U)

i. ~~(S//NF)~~ On 17 June 2015, APGFO met with b6 order to ascertain more information concerning SUBJECT 3'S foreign travel and confirm that SUBJECT 3'S off base meeting with (b)(2) & (b)(7)(E) b3 in fact not been approved. b6 confirmed that the meeting (b)(2) & (b)(7)(E) b3 had not been approved or authorized by ARL. SUBJECT 3 never conducted official travel to any other country (k)(2) & (b)(7)(E) b3 twice in 2013 and once in 2015. SUBJECT 3 never traveled with other ARL employees during these visits. Additionally, there were no indications SUBJECT 3 was ever scheduled to travel with other ARL members to HIS recent visit (b)(2) & (b)(7)(E) b3 from 21 March 2015 to 26 March 2015, which contradicts what HE previously reported.

(U)

6. ~~(S//NF)~~ ACTIONS TAKEN: This office conducted checks of (k)(2) & (b)(7)(E) b3 to determine if SUBJECT 3 was a registered asset of another agency and conducting the off-post meetings under that auspice, with negative results. Discussions with (k)(2) & (b)(7)(E) b3 SUBJECT 3 had at one time been (k)(2) & (b)(7)(E) b3 In general discussions (b)(2) & (b)(7)(E) b3 regarding prospects (b)(2) & (b)(7)(E) b3 opening an investigation, (b)(2) & (b)(7)(E) b3 that they would not open an investigation pertaining (b)(2) & (b)(7)(E) b3 under these circumstances. Checks with (k)(2) & (b)(7)(E) b3 indicated (k)(2) & (b)(7)(E) b3 on SUBJECT 3 but access to that information was not granted.

7. (U) AGENT'S COMMENTS:

(U)

a. ~~(S//NF)~~ In accordance with AR 381-12, paragraph 3-1(b) and 3-1(d), this office assesses this incident as Mission Area: Security Related Violation, Case Category: Contact Violation. This office recommends this incident be Opened/Terminated with a Summary of Information to

~~SECRET//NOFORN~~  
UNCLASSIFIED

Regraded UNCLASSIFIED on  
10 FEB 2022  
by USAINSCOM FOI/PA  
Auth Encl 5, para 1-d, DOD 5200-01-V1

UNCLASSIFIED  
~~SECRET//NOFORN~~

IAMG-B-AN (381-20p)

SUBJECT: ~~(S//NF)~~ Aberdeen Proving Ground, MD

(U) 2 March 2014

(U) LCCN: (b)(6) & (b)(7)(c)

(k)(2) & (b)(7)(E) b3 Department of Defense Consolidated Adjudication Facility and  
U.S. Army Research Laboratory.

(U)

b. ~~(S//NF)~~ According to (k)(2) & (b)(7)(E) b3 b6 is a  
Known Intelligence Office for (k)(2) & (b)(7)(E) b3 b6 is the subject of (b)(6) & (b)(7)(c)

(k)(2) & (b)(7)(E) b3

8. (U) REPORT PREPARED BY: (b)(6) & (b)(7)(c) Special Agent, APGFO, 902d MI Group,  
APG, MD 21005; Office Telephone: (b)(6) & (b)(7)(c)

(b)(6) & (b)(7)(c)

Special Agent  
902d MI Group

~~SECRET//NOFORN~~  
UNCLASSIFIED

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: [REDACTED]  
[REDACTED]

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: [REDACTED]

[REDACTED]  
[REDACTED]  
[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

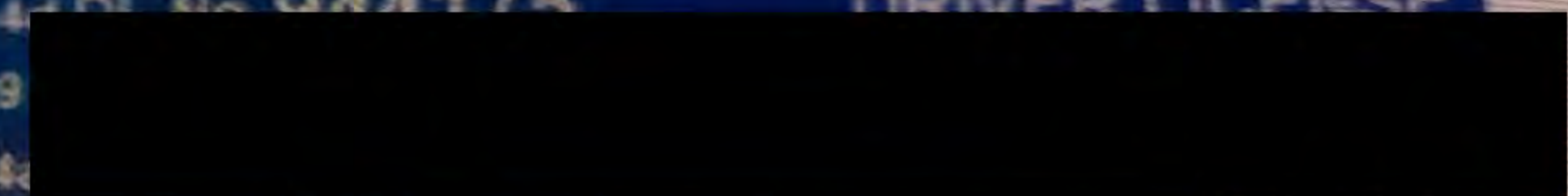
Cc: Bryan A. Cheeseman

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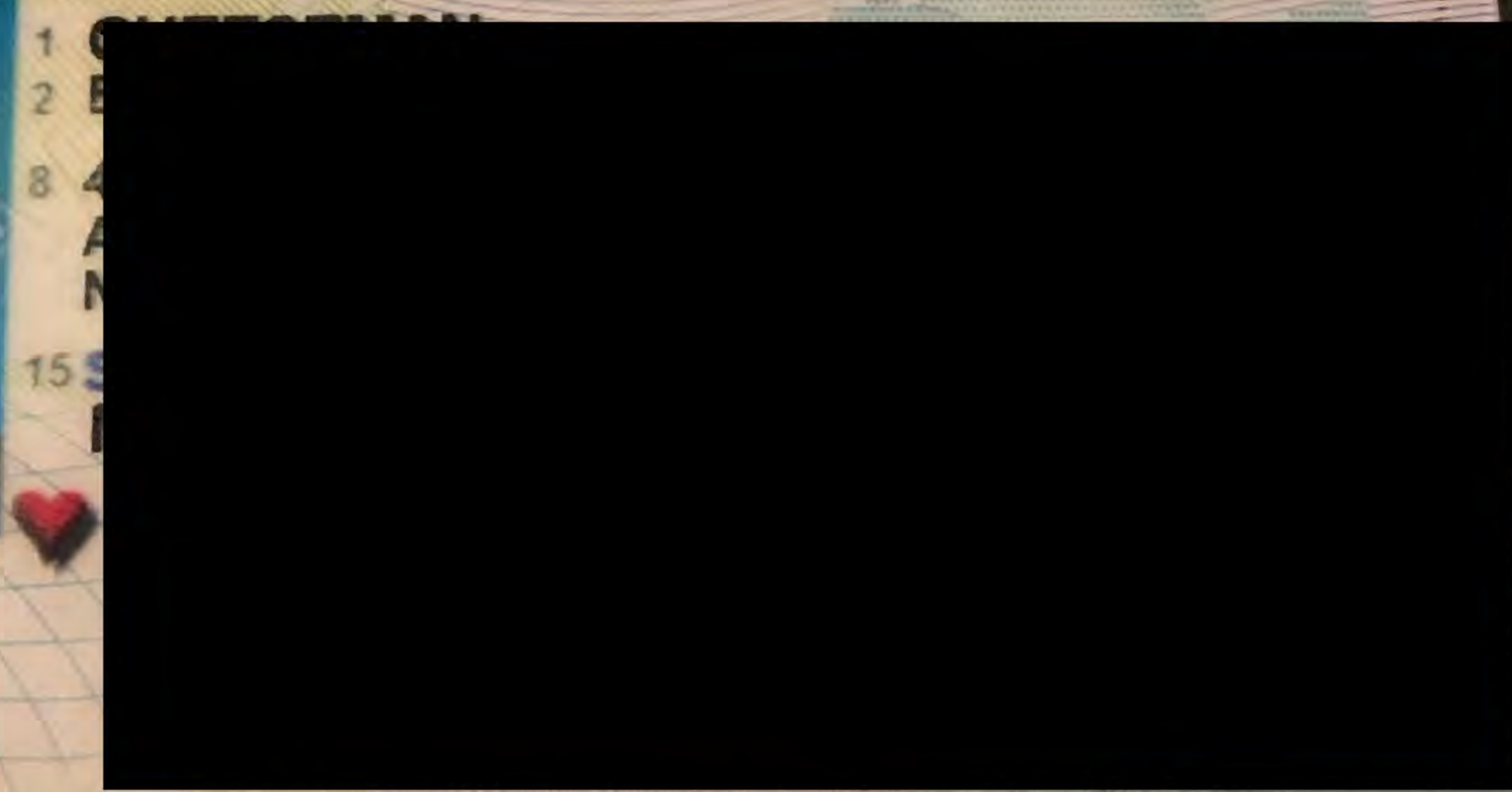


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*Ben Aron*



**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)