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July 22, 2022

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EXPEDITED PROCESSING REQUESTED

United States Department of Justice
National Security Division
3 Constitution Square
175 N Street N.E., 12th floor
Washington, D.C., 20530-0001
Attn: Arnetta Mallory, Government Information Specialist
nsdfoia@usdoj.gov

Re: Freedom of Information Act Request Letter

Dear Arnetta,:

This is a request under the Freedom of Information Act. 5 U.S.C. § 552, *et seq.*

Expedited Processing: I ask that this request receive expedited processing because a compelling need for the requested information exists in accordance with applicable law and regulations. On July 16, 2021, federal prosecutors with the Eastern District of New York filed an initial seven-count indictment against Thomas J. Barrack and other co-defendants, in which federal prosecutors alleged, among other things, that Mr. Barrack acted as unregistered agent of a foreign government without prior notification to the Attorney General of the United States in accordance with 18 U.S.C. § 951(a). Mr. Barrack's case is scheduled to commence trial in September 2022. The information requested under this FOIA request has a strong likelihood of constituting exculpatory evidence in connection with Mr. Barrack's upcoming trial, and as such, is critical to the preservation of Mr. Barrack's due process rights. Further, given the opaqueness in which charges under 18 U.S.C. § 951(a) have been brought by federal prosecutors historically, the information requested under this FOIA request is needed for the purpose of disseminating such information to inform the public as to the federal government's activity pursuant to 18 U.S.C. § 951(a). Accordingly, the close proximity to Mr. Barrack's upcoming trial as well as federal prosecutor's repeated delays in providing exculpatory evidence via the judicial process demonstrate that (1) substantial due process rights of Mr. Barrack would be significantly impaired by the failure to immediately process the requests set forth in this FOIA request and (2) the requested information is not otherwise available.

EXHIBIT

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Requested Records:

I request that a copy of documents containing the following information, within the US Department of Justice National Security Division, Interpol-United States National Central Bureau, or Office of International Affairs, Criminal Division, from November 1, 2016 to present day, be provided to me:

- Any communication, documents, and/or discussion with or about: Thomas J. Barrack and any variation thereof including but not limited to: Tom Barrack, Barrack, TJB, TB, or Tom B.
- Any discussions about an SF86 form for Thomas J. Barrack.
- Any discussions about a potential job, position, or appointment for Mr. Thomas J. Barrack or Tom Barrack.
- Any discussion about the position of Special Envoy for the Middle East (for any and all specific subcategories).
- Any discussions about a potential position in or for a Latin America related post for Mr. Thomas J. Barrack or Tom Barrack.
- Any communication from any person at any outside US federal agency requesting information about Thomas J. Barrack or Tom Barrack to anyone at the Department of Justice.
- Any communication about any person registered under 18 USC 951 for Qatar, Saudi Arabia, UAE, Iran, Iraq, Afghanistan, Pakistan, Oman, Yemen, Bahrain, Kuwait, Lebanon, Israel, Cyprus, Syria, Egypt, or Libya.
- Any communication about any person registered under the Foreign Agent Registration Act (FARA) for Qatar, Saudi Arabia, UAE, Iran, Iraq, Afghanistan, Pakistan, Oman, Yemen, Bahrain, Kuwait, Lebanon, Israel, Cyprus, Syria, Egypt, or Libya.

For the purpose of determining what, if any, fees may be assessed in connection with the processing of this request, I am requesting the records for commercial use. I agree to pay all necessary costs with respect to this request up to an amount of \$1,000. Please contact me if you expect that the costs will exceed such amount.

I request that the information I seek be provided in electronic format.

Please feel free to contact me via (i) email at skhurana@bhfs.com or (ii) telephone at 202-383-5919 if you have any questions or concerns.

Thank you for your prompt consideration of this request.

Sincerely,



Sohil Khurana