

Haupt, Joseph C.

From: Khurana, Sohil
Sent: Wednesday, June 29, 2022 6:13 PM
To: 'foiarequest@state.gov'
Cc: Dunn, Jason R.; Jensen, Tristan L.
Subject: RE: FOIA Request - Department of State Set 1(24377263.2)
Attachments: FOIA Request - Department of State Set 1(24377263.2).pdf

Good evening,

With respect to the below/attached FOIA request submitted on June 28th, 2022 – please note, we are requesting **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 on September 7, 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.

Please let us know of any questions or concerns as well as when you expect to provide the requested records.

Thank you,

Sohil

Sohil Khurana*

Policy Advisor and Associate

Brownstein Hyatt Farber Schreck, LLP

1155 F Street N.W., Suite 1200

Washington, DC 20004

202.383.5919 tel

skhurana@bhfs.com

* Currently licensed to practice law in New York, but not currently licensed in the District of Columbia.

From: Dunn, Jason R.
Sent: Tuesday, June 28, 2022 5:05 PM
To: 'foiarequest@state.gov' <foiarequest@state.gov>
Cc: Jensen, Tristan L. <tjensen@bhfs.com>
Subject: FOIA Request - Department of State Set 1(24377263.2)

EXHIBIT

2

Please see attached FOIA request and please confirm receipt. Thank you.