

# EXHIBIT A

# National Security Law Firm

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 21, 2022

**Via Email and Certified Mail: [dcsa.meade.caf.mbx.privacy-act@mail.mil](mailto:dcsa.meade.caf.mbx.privacy-act@mail.mil)**

Defense Counterintelligence and Security Agency (DCSA)

Attn: FOI/PA Office for Adjudications

1137 Branchton Road, Box 618

Boyers, PA 16018

RE: Our Client: MSG Deen N. Haleem

SS#: [REDACTED]

Revocation of Security Clearance for Classified Information

Dear Sir/Madam:

Please be advised that I have been retained to represent MSG Deen N. Haleem. On his behalf, I am requesting all records pertaining to MSG Haleem held by the Department of Defense.

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 substantial 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 Department of Defense investigator.

#### MSG Deen N. Haleem's verification of identity:

Full Name: Deen Haleem

Social Security No: [REDACTED]

Date of Birth: [REDACTED]

[REDACTED] LAIT CITY [REDACTED] [REDACTED]

**Agreement to 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

**MSG Deen N. Haleem'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.



MSG Deen N. Haleem

Date 2/21/28

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/ymf

Cc: MSG Deen N. Haleem

# EXHIBIT B

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*

**AMENDED FOIA-March 1, 2022**

February 21, 2022

**Via Email and Certified Mail: dcsa.meade.caf.mbx.privacy-act@mail.mil**

Defense Counterintelligence and Security Agency (DCSA)

Attn: FOI/PA Office for Adjudications

1137 Branchton Road, Box 618

Boyers, PA 16018

RE: Our Client: MSG Deen N. Haleem

SS#: [REDACTED]

Revocation of Security Clearance for Classified Information

Dear Sir/Madam:

Please be advised that I have been retained to represent MSG Deen N. Haleem. On his behalf, I am requesting all records pertaining to MSG Haleem held by the Department of Defense.

**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 substantial 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 Department of Defense investigator.
- 5) Copy of Office of Personnel Management, Tier 5 Reinvestigation, Case #1920623247-January 8, 2020; Office of Personnel Management, Single Scope Background Investigation-Periodic Reinvestigation, Case #1220440232-August 1, 2012

**MSG Deen N. Haleem's verification of identity:**

Full Name: Deen Haleem

Social Security No: [REDACTED]

Date of Birth: [REDACTED]

Place of Birth: [REDACTED]

Address: [REDACTED]

**Agreement to pay fees:**

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

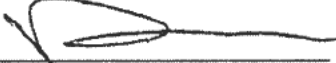
**Preferred delivery method:**

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

**MSG Deen N. Haleem's authorization for release:**

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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.

  
\_\_\_\_\_  
MSG Deen N. Haleem

2/21/28  
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/ymt  
Cc: MSG Deen N. Haleem

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## REQUEST for RECORDS DCSA – Investigations

Please EXPEDITE to assist in responding to a DoD CAF Statement of Reasons (SOR).

**Defense Countereintelligence and Security Agency (DCSA)**  
**Attn: FOI/PA Office for Investigations**  
**P.O. Box 618; 1137 Branchton Road**  
**Boyers, PA 16018-0618**

Email: FOIPARRequests@NBIB.gov

To request a copy of DCSA investigation records (formerly known as NBIB-OPM), **complete this form** and provide copies of **two (2) identity source documents**, to the DCSA Boyers FOI/PA office. You may submit your request via mail to the address above, or submit via e-mail to the e-mail address above using scanned attachments.

- Visit the DCSA FOI/PA Office for Investigations website (“Completed Investigations” tab) to view a list of acceptable forms of identity source documents at:  
<https://www.dcsa.mil/mc/pv/mbi/mr/>
- If submitting via e-mail, you should ensure that the security of your e-mail system is adequate for transmitting your sensitive personally identifiable information (PII) before choosing to transmit your request.

**Description of Records Being Sought:** *I request a copy of records pertaining to me, specified below, which are maintained by the DCSA. These documents are needed to assist in responding to a Statement of Reasons (SOR) issued by the DoD CAF.*

### Requested Records:

List the Investigation Case# provided via the DoD CAF SOR Pertinent Documents page.

OPM or DCSA Case #: NONE PROVIDED

OPM or DCSA Case #: NONE PROVIDED

### My Identifying Information:

Full Name: DEEN NIMEK HALEEM

Date of Birth: 

Full Social Sec: 

Please send the requested records to me via (select one):

( ) Hardcopy Mail (physical address required):

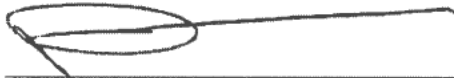
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E-Mail (e-mail address required): deen.n.haleem.mil@ARMY.MIL

*"I declare under penalty of perjury under the laws of the United States of America that the foregoing information [concerning my identity] is true and correct."*



Handwritten Signature (required)

2/15/22

Date

**Privacy Act Advisement:** Requesting personal information which includes your Social Security Number is authorized by 5 USC Sec. 552a (*Privacy Act of 1974*). Information provided herein is used to identify and retrieve records pertaining to you. Providing all or part of the information is voluntary; however, without it, the above agency may not be able to identify your records. This information may be retained and/or released to other agencies under Routine Use.

**Authority:** E.O. 12968, Access to Classified Information, and the Department of Defense (DoD) Manual 5200.02, *Procedures for the DoD Personnel Security Program*.





# EXHIBIT C



**DEFENSE COUNTERINTELLIGENCE AND SECURITY AGENCY**

27130 TELEGRAPH ROAD  
QUANTICO, VA 22134-2253

March 25, 2022

National Security Law Firm  
Attn: Brett John O'Brien  
1250 Connecticut Avenue  
Suite 700  
Washington, DC 20036

Re: Deen Nimer Haleem

Dear Mr. O'Brien:

This is in reference to Deen Namir Haleem's request that a copy of their background investigations, standard forms and interagency/intra-agency records/correspondence be provided to your office. Two requests were received by the Department of Defense, Defense Counterintelligence and Security Agency (DCSA), Freedom of Information and Privacy Act (FOI/PA) office on March 8, 2022 and March 14, 2022.

We are unable to make an accurate search of our records for "interagency and intra-agency correspondence" without additional information from you. Please submit a new request and describe the type of correspondence you seek.

We have provided a complete copy of Mr. Haleem's investigative file. We reviewed the enclosed documents in accordance with the Freedom of Information Act (FOIA) and the Privacy Act of 1974, as amended.

At the time of Deen Namir Haleem's background investigation, we obtained information from the Naval Criminal Investigative Service. To obtain these records, he may submit a Privacy Act request by following the procedures on their website, <https://www.ncis.navy.mil/Resources/FOIA/>, or by writing to: NCISHQ, Code OOLJF, Russell-Knox Building, 27130 Telegraph Road, Quantico, VA 22134.

Deen Namir Haleem's investigative file also contains information that is the property of the Federal Bureau of Investigation (FBI). We referred this information and a copy of the request for an access decision and the FBI will respond directly to you. We enclosed a copy of our correspondence to the FBI. You may contact them at that address for information about this referral or refer to their website for additional information:  
<https://www.fbi.gov/services/information-management/foipa/requesting-fbi-records>.

Deen Namir Haleem's investigative file contains information that originated with the Army Investigative Records Repository (AIRR). The DCSA FOIP Office for Adjudications will coordinate the referral of this information and that agency will respond to you directly.

At the time of Deen Namir Haleem's background investigation, the investigative file contained information on Nargiss Nimer Abdelmuti, Haleem Nimer Nofa, Abdelrazak Abdelhaleem and Noha Abuswalim that originated with another federal agency. We withheld this information pursuant Privacy Act exemption (k)(2) and FOIA exemptions (b)(6) and (b)(7)(C). Privacy Act

National Security Law Firm  
Attn: Brett John O'Brien  
Deen Nimer Haleem

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exemption (k)(2) protects investigatory material compiled for law enforcement purposes that, if released, might interfere with a civil or administrative action, or investigation, and result in the unwarranted invasion of personal privacy of others. FOIA exemptions (b)(6) and (b)(7)(C) protect information from release that could reasonably be expected to cause an unwarranted invasion of privacy to third-parties.

We cannot consider release of this information until we receive a written statement from the above referenced individual(s) authorizing the release of this information directly to you. The statement must contain either an original notarized authorization or an unsworn declaration in accordance with 28 U.S.C. 1746, in the following format: I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct. The declaration must contain a signature and date executed.

An original notarized authorization or declaration can be mailed to: Defense Counterintelligence and Security Agency, Attn: FOI/P Office, P.O. Box 618, 1137 Branchton Road, Boyers, PA 16018-0618. A declaration may be sent via unsecure fax to 724-794-4590 or emailed as an attachment to [dcsa.boyers.dcsa.mbx.inv-foip@mail.mil](mailto:dcsa.boyers.dcsa.mbx.inv-foip@mail.mil). Please ensure that the security of your email system is adequate before transmitting your request, which contains personally identifiable information (full name, social security number, date of birth, etc.).

We withheld information from document(s) 371 in accordance with FOIA exemption (b)(3) and Privacy Act exemption (j)(1). Exemption (b)(3) protects those records specifically exempt from release by statute, which in this case is Section 102A(i)(1) of the National Security Act of 1947, as amended. Exemption (j)(1) applies to systems of records maintained by the Central Intelligence Agency

You/ Deen Namir Haleem have the right to appeal this response by submitting a written request to the Defense Counterintelligence and Security Agency, ATTN: Office of General Counsel, 27130 Telegraph Road, Quantico, VA 22134. Clearly mark the outside of the envelope and your written appeal letter: "Privacy/FOIA Appeal". Your/his appeal must be received by DCSA within ninety (90) calendar days from the date of this letter to be considered timely. Your written appeal letter should include the reasons why the requested information should be released and why this action may be in error. Include with your appeal letter a copy of your original request and this response letter. Please reference tracking number DCSA-B 22-04594.

On behalf of the Financial Crimes Enforcement Network (FinCEN), we withheld document(s) 126-129, 260-368 and also portions of document(s) 1, 2, 4, 8, 9, 100, 130, 131, 133, 135, 136 and 138 in accordance with FOIA exemption (b)(3) and Privacy Act exemptions (j)(2) and (k)(2). Exemption (b)(3) protects those records that are specifically exempt from release by statute, which in this case is 31 U.S.C 5319. Privacy Act exemption (j)(2) allows for withholding information maintained by an agency or agency component whose main function pertains to enforcing criminal laws. Exemption (k)(2) protects investigative material compiled for law enforcement purposes, other than criminal, which did not result in loss of a right, benefit or privilege under federal programs.

National Security Law Firm  
Attn: Brett John O'Brien  
Deen Nimer Haleem

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Deen Namir Haleem's may appeal FinCEN's action by submitting a written request to the following address within 90 days from the date of this letter: Financial Crimes Enforcement Network, Disclosure Office, P.O. Box 39, Vienna, VA 22183. Deen Namir Haleem's appeal should include the reasons why the requested information should be released and why this action may be in error. Attach a copy of his original request and this response letter and clearly mark the letters and the outside envelope, "FOIA Appeal." You may refer to their website for additional information: <https://www.fincen.gov/filing-privacy-act-request>.

On behalf of the Federal Bureau of Investigation (FBI), we withheld information on document(s) 3, 4, 6, 83, 85, 132, 137, 369 and 371 in accordance with Privacy Act exemption (j)(2) and FOIA exemption (b)(7)(E). Exemption (j)(2) allows for withholding information maintained by an agency or agency component whose main function pertains to enforcing criminal laws. Exemption (b)(7)(E) protects information that "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."

Appeals of the FBI's (j)(2), (b)(7)(E) redactions directly to the Department of Justice by submitting a written request to the Office of Information Policy, Sixth Floor, 441 G Street, NW, Washington, DC 20530-0001, or you may submit an appeal through OIP's eFOIA portal at <https://www.justice.gov/oip/submit-and-track-request-or-appeal>. The appeal must be received by OIP within ninety (90) days from the date of this letter to be considered timely. The envelope and letter should be marked "Freedom of Information Appeal."

The Office of Government Information Services (OGIS) was created to offer mediation services to resolve disputes between FOIA requesters and federal agencies as a non-exclusive alternative to litigation. You may contact OGIS in any of the following ways:

U.S. National Archives and Records Administration	Phone: 202-741-5770
Office of Government Information Services	Toll-Free: 1-877-684-6448
8601 Adelphi Road - OGIS	Fax: 202-741-5769
College Park, MD 20740-6001	Email: <a href="mailto:ogis@nara.gov">ogis@nara.gov</a>

If you have any questions regarding this response, contact the Freedom of Information and Privacy office at 724-794-5612 ext. 7000 and reference tracking number DCSA-B 22-04594.

Sincerely,



Lisa A. Desko  
Government Information Specialist

Enclosures

# EXHIBIT D



# Privacy Act Data Cover Sheet

To be used on  
all documents  
containing personal  
information

## DOCUMENTS ENCLOSED ARE SUBJECT TO THE PRIVACY ACT OF 1974

Contents shall not be disclosed, discussed, or shared with individuals unless they have a direct need-to-know in the performance of their official duties. Deliver this/these document(s) directly to the intended recipient. **DO NOT** drop off with a third-party.

The enclosed document(s) may contain personal or privileged information and should be treated as "For Official Use Only." Unauthorized disclosure of this information may result in **CIVIL** and **CRIMINAL** penalties. If you are not the intended recipient or believe that you have received this document(s) in error, do not copy, disseminate or otherwise use the information and contact the owner/creator or your Privacy Act officer regarding the document(s).

# Privacy Act Data Cover Sheet



**DEFENSE COUNTERINTELLIGENCE AND SECURITY AGENCY**  
27130 TELEGRAPH ROAD  
QUANTICO, VA 22134-2253

May 26, 2022  
DCSA-M 22-04366

Mr. Brett O'Brien  
National Security Law Firm  
1250 Connecticut Avenue, NW  
Suite 700  
Washington, DC 20036

RE: Haleem, Deen N.

Dear Mr. O'Brien:

This is in response to your amended Freedom of Information/Privacy Act request (FOI/PA) dated February 21, 2022, on behalf of your client, Mr. Deen N. Haleem, wherein you requested all interagency and intra-agency correspondence, records, and standard forms pertaining to Mr. Haleem; a complete copy of investigative interview with the Department of Defense investigator; a copy of the Office of Personnel Management, Tier 5 Reinvestigation, Case #1920623247 - January 8, 2020; and the Office of Personnel Management, Single Scope Background Investigation-Periodic Reinvestigation, Case #1220440232 - August 1, 2012. Your request, including Mr. Haleem's Authorization, was received in the Defense Counterintelligence and Security Agency (DCSA) Freedom of Information and Privacy Office for Adjudications on March 9, 2022. We conducted a search for records pertaining to Mr. Haleem.

Our search revealed the attached documents, which we are authorized to release to you. We also identified a responsive record or records, consisting of four pages total, which we have withheld under the provisions of the *Privacy Act of 1974*, Title 5 U.S.C. § 552(a), exemption (d)(5), and the *Freedom of Information Act* (FOIA), Title 5 U.S.C. § 552, exemptions (b)(5), (b)(6), (b)(7)(C), and (b)(7)(E). Privacy Act exemption (d)(5) protects disclosure of information that is compiled in reasonable anticipation of civil action or proceedings, court proceedings or quasi-judicial administrative hearings. FOIA exemption (b)(5) protects inter-and intra-agency documents which are deliberative in nature, and part of the decision making process. Portions of the records contain privacy-related information about a party other than your client. Thus, Mr. Haleem is not entitled to third party information under the provisions of the Privacy Act. This information is also withheld per the Freedom of Information Act, Title 5 U.S.C. § 552, exemptions (b)(6) and (b)(7)(C), as disclosure of the information would constitute a clearly unwarranted invasion of the personal privacy of the individuals involved. FOIA exemption (b)(7)(E) applies to records or information which could disclose investigative techniques and procedures.

Records which fall under the release authority of the Department of the Army, the U.S. Army Intelligence and Security Command, and the Defense Counterintelligence and Security Agency DCSA, FOIA and Privacy Office for Investigations, were located. We do not have release authority for those records; thus, we are referring your request and responsive records to their Privacy Offices, for action and direct response to you. Since the DCSA, FOIA



and Privacy Office for Investigations responded to your request, (reference, DCSA 22-04594), we will take no further referral action.

Mr. Haleem has the right to appeal this response by submitting a written request to the: Defense Counterintelligence and Security Agency, ATTN: Office of General Counsel, 27130 Telegraph Road, Quantico, VA 22134-2253. Clearly mark the outside of the envelope and the written appeal letter: "*Privacy/FOIA Appeal.*" The appeal must be received by DCSA within ninety (90) calendar days from the date of this letter to be considered timely. The written appeal letter should include the reasons why the requested information should be released and why this action may be in error. Include with the appeal letter a copy of the original request and this response letter. Please reference FOI/PA tracking number DCSA-M 22-04366 in all communications.

Your client may seek dispute resolution services from the HQ DCSA FOIA Office or the Office of Government Information Services (OGIS). The HQ DCSA FOIA Office may be contacted by emailing [dcsa.quantico.dcsa-hq.mbx.foia@mail.mil](mailto:dcsa.quantico.dcsa-hq.mbx.foia@mail.mil). OGIS was created to offer mediation services to resolve disputes between FOIA requesters and federal agencies as a non-exclusive alternative to litigation. OGIS may be contacted in any of the following ways:

U.S. National Archives and Records Administration	Phone: 202-741-5770
Office of Government Information Services	Toll-Free: 1-877-684-6448
8601 Adelphi Road – OGIS	Fax: 202-741-5769
College Park, MD 20740-6001	Email: <a href="mailto:ogis@nara.gov">ogis@nara.gov</a>

No other records were located responsive to your request. We hope this information is helpful, and appreciate the opportunity to assist you in this matter.

Sincerely,

**M. Munoz**

Digitally signed by  
M. Munoz  
Date: 2022.05.26 09:53:52  
-04'00'

for/

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

Attachments:  
As stated



**DEPARTMENT OF DEFENSE  
CONSOLIDATED ADJUDICATIONS FACILITY  
BUILDING 600 10TH STREET  
FORT GEORGE G. MEADE, MD 20755-5615**



February 8, 2022

MEMORANDUM FOR 3RD BRIGADE (OD)-122  
(ATTN: SECURITY MANAGEMENT OFFICE)

SUBJECT: Instructions for Handling Statement of Reasons Re: MSG Deen N. Haleem,  
[REDACTED]

References: (a) DoDM 5200.02, Procedures for the DoD Personnel Security Program (PSP)  
April 3, 2017  
(b) Security Executive Agent Directive 4, National Security Adjudicative  
Guidelines, December 10, 2016 (Effective June 8, 2017)  
(c) ICD 704, Personnel Security Standards and Procedures Governing Eligibility  
for Access to Sensitive Compartmented Information, and Other Controlled  
Access Program Information, October 1, 2008  
(d) ICPG 704.3, Denial or Revocation of Access to Sensitive Compartmented  
Information, Other Controlled Access Program Information, and Appeals  
Processes, October 2, 2008

1. After careful review of available pertinent information and in accordance with the references above, the Department of Defense (DoD) Consolidated Adjudications Facility (CAF) has made a preliminary decision to deny or revoke the Subject's eligibility for access to classified information, assignment to duties that have been designated national security sensitive, and access to SCI. The DoD CAF's assessment of the applicable security concerns for this preliminary decision is documented in the attached Statement of Reasons (SOR) addressed to the Subject.

2. The purpose of this memorandum is to provide instructions for actions required by your organization related to the Subject named in the attached SOR. Denial or revocation of eligibility for access to classified information, duties that have been designated national security sensitive, and SCI access can have a severe impact on Subjects and their careers. The procedures required by the above references must be closely followed to ensure that all elements of security and fairness are met.

3. Your organization is responsible for determining whether to suspend access to classified information and/or assign the Subject to non-sensitive duties pending a final personnel security decision. Failure to do so could result in an increased level of security risk to your organization and/or national security.

4. Please ensure the following actions, as appropriate, are accomplished within the specified time frames:

a. Promptly deliver the attached Statement of Reasons package to the Subject.

THE CONTENTS OF THIS DOCUMENT ARE PROTECTED UNDER THE PRIVACY ACT OF 1974.

(1)

Updated on: 20200511

b. Establish a point of contact for the Subject. Advise the Subject that he/she should not attempt to communicate directly with the DoD CAF and all communication with the DoD CAF must be forwarded through the Security Management Office (SMO) or SCI SMO.

c. Complete and forward the *Statement of Reasons Receipt and Statement of Intent* to the DoD CAF within ten (10) calendar days of the Subject's receipt of the SOR package. Ensure that the Subject and your office properly complete the form. This form notifies the DoD CAF whether the Subject intends to respond to the SOR. Should the subject refuse to complete the *Statement of Reasons Receipt and Statement of Intent*, the SMO or SCI SMO will complete the form verifying the date the package was delivered to the Subject and forward the completed form to the DoD CAF within ten (10) calendar days of the subject's refusal to sign. An additional witness is required to sign the form to verify the SOR package was delivered to the Subject.

d. Also, ensure the Subject understands that he/she may choose to obtain legal counsel, or other assistance, in preparing a response to this preliminary decision. He/she may obtain civilian counsel, at personal expense, or, if eligible, from the staff of the Judge Advocate General. Advise the Subject that if he/she desires assistance from legal counsel that he/she should make those arrangements immediately.

e. Ensure that the Subject understands the consequences of being found ineligible for access to classified information, assignment to duties that have been designated national security sensitive, and SCI access, and the serious effect such a decision could have on his/her career.

f. Take particular care to ensure that the Subject fully understands that the preliminary denial or revocation decision will become final based on the available information if:

- your organization notifies the DoD CAF via the *Statement of Reasons Receipt and Statement of Intent* that the Subject does not intend to respond to the SOR, or
- the Subject reports that he/she will respond to the SOR and the DoD CAF receives no response within the specified time period.

**Ensure the Subject understands that in either of these instances, the preliminary decision will become a final determination on the merits of the available information.**

g. If the Subject chooses to respond to the SOR, inform him/her they have sixty (60) calendar days from the date of their acknowledgment on Attachment 2, Statement of Reason Receipt and Statement of Intent, of his/her memorandum, to submit the response in writing through the SMO or SCI SMO. Ensure the Subject understands that requests for an extension beyond the established suspense date must be submitted in writing through the SMO or the SCI SMO prior to the SOR response due date, and approved by the DoD CAF. Exceptions to this policy may only be circumstances where the Subject's failure to respond to the SOR was due to factors beyond his or her control.

h. Assist the Subject in obtaining the applicable references and copies of pertinent investigative files. The SOR is based on information obtained from investigative agencies and/or

other sources. If the Subject desires copies of releasable information pertinent to this SOR, advise him/her to follow the instructions in Attachment 3 of his/her memorandum.

i. Advise the Subject that written comments from personal references may be included as part of the response to the SOR. Such written comments may include observations regarding the Subject's judgment, reliability and trustworthiness. Personal references may comment on the pending eligibility decision if knowledgeable of the security issues identified in the SOR. Whether or not comments from personal references are included, the Subject's response to the SOR must be received in your office by the suspense date.

j. Ensure the response to the SOR is promptly endorsed by the appropriate authority, with a copy to the Subject, and immediately forwarded to the DoD CAF.

5. Deployment/TDY. It is in the best interest of national security that this notice to the Subject be delivered as soon as possible. It is understood, however, that deployment or other operational circumstances may make it difficult for the Subject to provide an adequate response. If the Subject is currently deployed or other operational circumstances prevent your organization from initiating this due process action, immediately notify the DoD CAF in writing. Be sure to provide your SMO or SCI SMO contact information to the DoD CAF, and keep us apprised of the Subject's status. Upon the Subject's return from deployment, or the end of the operational circumstance, your office should deliver the SOR immediately and forward the signed *Statement of Reasons Receipt and Statement of Intent* to the DoD CAF as soon as possible.

6. If you have any questions, please contact the DoD CAF Call Center at commercial (301) 833-3850 or DSN 733-3850 or send a message via the DISS Portal.

*Pamela Robinson* by clk

Pamela Robinson  
Division Chief  
Adjudications Directorate

Attachment:  
Subject's Memorandum (w/attachments)



DEPARTMENT OF DEFENSE  
CONSOLIDATED ADJUDICATIONS FACILITY  
BUILDING 600 10TH STREET  
FORT GEORGE G. MEADE, MD 20755-5615



February 8, 2022

MEMORANDUM FOR MSG DEEN N. HALEEM, [REDACTED]

THROUGH: 3RD BRIGADE (OD)-122  
(ATTN: SECURITY MANAGEMENT OFFICE)

SUBJECT: Intent to Revoke Eligibility for Access to Classified Information, Assignment to Duties that have been Designated National Security Sensitive, and Access to Sensitive Compartmented Information (SCI)

References: (a) DoDM 5200.02, Procedures for the DoD Personnel Security Program (PSP), April 3, 2017  
(b) Security Executive Agent Directive 4, National Security Adjudicative Guidelines, December 10, 2016 (Effective June 8, 2017)  
(c) ICD 704, Personnel Security Standards and Procedures Governing Eligibility for Access to Sensitive Compartmented Information, and Other Controlled Access Program Information, October 1, 2008  
(d) ICPG 704.3, Denial or Revocation of Access to Sensitive Compartmented Information, Other Controlled Access Program Information, and Appeals Processes, October 2, 2008

1. Per the above references, a preliminary decision has been made by the Department of Defense (DoD) Consolidated Adjudications Facility (CAF) to revoke your eligibility for access to classified information, assignment to duties that have been designated national security sensitive, and access to Sensitive Compartmented Information (SCI).

2. A decision on eligibility for access to classified information, assignment to duties that have been designated national security sensitive, and SCI access is a discretionary security decision based on judgments by appropriately trained adjudicative personnel. Pursuant to reference (a), eligibility shall be granted only where facts and circumstances indicate eligibility for access to classified information is clearly consistent with the national security interests of the United States, and any doubt shall be resolved in favor of the national security. Information concerning your personal history has led to the security concern(s) listed in Attachment 1, *Statement of Reasons (SOR)*, which prevent the DoD CAF from making the affirmative decision that your eligibility is clearly consistent with the interests of national security. If this preliminary decision becomes final, you will not be eligible for access to classified information, assignment to duties that have been designated national security sensitive, and SCI access as defined by the above-cited references.

3. If you currently have access to classified information, this access may be suspended by your organization's Security Management Office.

THE CONTENTS OF THIS DOCUMENT ARE PROTECTED UNDER THE PRIVACY ACT OF 1974.

4. You must complete Attachment 2, *Statement of Reasons Receipt and Statement of Intent*, and forward it to the DoD CAF, via your organization's Security Management Office (SMO) or SCI SMO within ten (10) calendar days of receipt of this memorandum. Contact your SMO or SCI SMO for help in preparing and forwarding this form. If the completed Attachment 2 is not received at the DoD CAF, it will be presumed that you do not intend to submit a reply.
5. You may request the records upon which the DoD CAF relied on to make the preliminary decision. Attachment 3 is provided to assist you in requesting your records. Use the Defense Counterintelligence and Security Agency (DCSA) investigation request if your SOR is based upon a DCSA Investigation (formerly known as the Office of Personnel Management (OPM) investigation). Use the appropriate records request form(s) provided herein, if your SOR is based upon records other than, or in addition to, the DCSA investigation. Failure to request the record(s) in a timely manner, failure to provide an accurate mailing address, and/or failure to accept receipt of the record(s) upon delivery, will not serve as justification for an extension of time to respond to the SOR.
6. You may challenge this preliminary decision by responding, in writing, with any information or explanation that you think should be considered in reaching a final decision. Attachment 4, *Instructions for Responding to a Statement of Reasons*, provides instructions to assist you if you choose to submit a response. Attachment 5, *National Security Adjudicative Guidelines*, provides information on the guidelines and Attachment 6, *Applicable National Security Adjudicative Guidelines*, provides the specific national security adjudicative guideline(s) from reference (b) used in this preliminary decision.
7. You may choose to obtain legal counsel, or other assistance, in preparing your response to this preliminary decision. You may obtain civilian counsel, at your own expense, or, if you are eligible, from the staff of the Judge Advocate General. If you desire assistance from legal counsel, you should make those arrangements immediately.
8. If you choose the option to respond, your written response must be submitted through your SMO or SCI SMO within sixty (60) calendar days from the date you acknowledge receipt of this memorandum. Your SMO or SCI SMO will then forward it to the DoD CAF. To request an extension, you must provide a written request, with justification, to your SMO or SCI SMO prior to the current deadline. Your SMO or SCI SMO will then submit your request to the DoD CAF for review/approval. Any request for extension of time to respond may be granted only by the DoD CAF.

9. If you choose the option not to respond or if you chose to respond but your response is not received by your SMO or SCI SMO within the specified time, this preliminary decision will become a final security determination on the merits of the information available. Please direct questions regarding this memorandum to your SMO or SCI SMO.

*Pamela Robinson* by *clk*

Pamela Robinson  
Division Chief  
Adjudications Directorate

Attachments:

1. Statement of Reasons
2. Statement of Reasons Receipt and Statement of Intent
3. Form(s) for Requesting Records
4. Instructions for Responding to a SOR
5. National Security Adjudicative Guidelines
6. Applicable National Security Adjudicative Guidelines

**STATEMENT OF REASONS (SOR) FOR MSG DEEN N. HALEEM,** 

The information listed below was derived from the documents listed at the end of this attachment (Attachment 1, Statement of Reasons). Each item of disqualifying information falls under one or more of the security guidelines listed below.

**GUIDELINE B: Foreign Influence**

Available information shows issues of Foreign Influence on your part.

Foreign contacts and interests, including, but not limited to, business, financial, and property interests, are a national security concern if they result in divided allegiance. They may also be a national security concern if they create circumstances in which the individual may be manipulated or induced to help a foreign person, group, organization, or government in a way inconsistent with U.S. interests or otherwise made vulnerable to pressure or coercion by any foreign interest.

Per the Adjudicative Guidelines, conditions that could raise a security concern and may be disqualifying include:

An Army Investigative Records Repository (AIRR) file included a Report of Investigation (ROI), dated September 23, 2008, that revealed an investigation was initiated on September 5, 2003 by the 902<sup>nd</sup> Military Intelligence Group to determine if you were involved with or supported a Foreign Intelligence Service or International Terrorist Organization. This concern stemmed from allegations regarding your attempts to gain access to unauthorized areas, foreign connections, unusual work patterns, and allegations that you posed as a Counterintelligence (CI) Agent conducting unauthorized activities.

From September 11, 2003 to December 18, 2003, a source with 744<sup>th</sup> Military Police (MP) Battalion (BN) was interviewed on four occasions. The source provided that you had not completed the necessary training in order to carry a badge and credentials as a CI Agent. While deployed, you removed your name tags and rank from your uniform without authorization and conducted interrogations in Arabic without providing interpretation for the assigned interrogators. You conducted operations outside your area of authorities and responsibility. Additionally, you purchased a Thuraya satellite phone for personal use while in Kuwait and had unauthorized contact with Enemy Prisoners of War (EPWs). You also conducted unauthorized counterintelligence source operations and were instructed to cease all source operations.

A source with 744<sup>th</sup> MP BN was interviewed on three occasions between September 11, 2003 and January 13, 2005 and provided that while in Kuwait, you attempted to obtain authorization for off-post travel and you drove a Non-Tactical Vehicle (NTV) without a NTV license. The source alleged that you changed the status of EPWs to civilian and took them off post. You insisted that you were authorized to act as a CI Agent in theater. On October 10, 2003, an additional source was interviewed and he/she confirmed that you classified military EPWs as civilians and operated a NTV not obtained through your brigade. The source added that you left unidentified Arab men unattended for several hours in a restricted area on a compound and you engaged in questionable interrogation techniques.

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On December 19, 2003 and December 26, 2003, a source was interviewed to clarify your activities while assigned to HHC 744<sup>th</sup> MP BN. The source provided that a Marine unit had warned the 744<sup>th</sup> MP BN that if you continued to conduct source operations in their area of operations, they would have you arrested. The source further revealed that you were counseled for not being in appropriate uniform and using unauthorized badges on your uniform.

On January 12, 2004 and February 2, 2004, you were interviewed by investigators. You provided that you were assigned to the 744<sup>th</sup> MP BN and you were placed in a 97B Counterintelligence Agent position. You stated that a signed memorandum authorized you to perform duties as a CI agent. You denied allegations that you conducted interrogations of EPWs or that you traveled off of TSP Whiteford alone. You confirmed that you purchased a Thuraya phone while in Kuwait in order to contact your family, and, on occasion, to coordinate with volunteer Kuwaiti linguists during their travel. On January 13, 2004, you were contacted in order to arrange your transportation to Camp Victory. Upon arrival at Camp Victory, you stated that you wished to seek legal counsel. On February 2, 2004, you were approached to coordinate a second interview. USAI met with you and requested a second interview. You responded with a request that USAI provide you with a list of questions, which you would answer when you were ready to waive your rights again. This request was not granted and you stated that you would not talk to USAI without a lawyer present.

On January 16, 2004, a source was interviewed to verify information provided by you. The source provided that you called him several times regarding a source of yours that had information possibly pertaining to Kuwaiti prisoners in Iraq. You asked the source if he could get money to pay the source for the information. He provided you with points of contact in the U.S. Embassy in Kuwait and you in turn informed him that you had contacts in the Kuwaiti Ministry of Interior.

On February 18, 2004, an Instructor was interviewed concerning the scope and requirements to become a 97B Counterintelligence Agent in the Reserves. The source provided that only upon completion of Phases I-III will reservists be awarded a badge and credentials. The source had no knowledge of you completing Phases II and III. On February 19, 2004, a records check was conducted at the 6<sup>TH</sup> BN, 98<sup>TH</sup> DIV (Institutional Training) to determine if you had completed the 97B MOS training. Records revealed that you only completed Phase I of the 97B MOS training.

On November 16, 2004, a source was interviewed to confirm or refute allegations that you conducted unauthorized source operations in Iraq. The source provided that you submitted reports that contained information from "sources." The source also heard several times over the radio in the Tactical Operations Center (TOC) that there were "sources" at the compound gate who wanted to speak with you. The source further advised that you maintained a classified laptop in your quarters that you shared with two Kuwaiti nationals.

On August 17, 2006, your lawyer advised against you participating in a Subject Interview to resolve the above allegations. On August 25, 2006, the investigation by the 902<sup>nd</sup> MI Group was terminated as unresolved.

On your Standard Form 86, signed by you on August 2, 2018, you answered "no" to a question under Section 20A (Foreign Activities) that asked, "Have you, your spouse, or legally recognized civil union/domestic partner, cohabitant, or dependent children EVER owned, or do you

anticipate owning, or plan to purchase real estate in a foreign country?” Conversely, during your interview with an Office of Personnel Management (OPM) investigator on May 15, 2019, you were asked this same question and you changed your answer to “yes.” You disclosed that you currently own farmland in the town of Ramallah, in the West Bank of Palestine that you inherited from your deceased mother, father, and uncle.

Your unauthorized source operations outside of your area of authority directly contradicted the efforts of the U.S. military service members tasked and trained to execute those duties. Numerous sources reported that you frequently conducted interrogations in a foreign language while failing to provide translations to assigned interrogators. Furthermore, you routinely failed to exercise proper caution while interacting with EPWs and there are strong indications that you allowed foreign nationals into restricted areas where they were left unattended for several hours. These actions and incidents were investigated by the 902<sup>nd</sup> Military Intelligence Group to determine if you were involved with or supported a Foreign Intelligence Service or International Terrorist Organization. This investigation was terminated as unresolved. Most recently, you omitted pertinent information regarding your ownership of foreign real estate in Ramallah. These facts indicate that your access to classified information constitutes an unacceptable risk to national security. Therefore, your foreign activities and interests are a security concern. (Guideline B, Attachment 6)

#### **GUIDELINE E: Personal Conduct**

Available information shows issues of Personal Conduct on your part.

Conduct involving questionable judgment, lack of candor, dishonesty, or unwillingness to comply with rules and regulations can raise questions about an individual’s reliability, trustworthiness, and ability to protect classified or sensitive information. Of special interest is any failure to cooperate or provide truthful and candid answers during national security investigative or adjudicative processes.

Per the Adjudicative Guidelines, conditions that could raise a security concern and may be disqualifying include:

An AIRR file included a ROI, dated September 23, 2008, that revealed an investigation was initiated on September 5, 2003 by the 902<sup>nd</sup> Military Intelligence Group to determine if you were involved with or supported a Foreign Intelligence Service or International Terrorist Organization. This concern stemmed from allegations regarding your attempts to gain access to unauthorized areas, foreign connections, unusual work patterns, and allegations that you posed as a Counterintelligence Agent conducting unauthorized activities. On January 13, 2004, you were contacted in order to arrange your transportation to Camp Victory. Upon arrival at Camp Victory, you stated that you wished to seek legal counsel. On February 2, 2004, you were approached to coordinate a second interview. USAI met with you and requested a second interview. You responded with a request that USAI provide you with a list of questions, which you would answer when you were ready to waive your rights again. This request was not granted and you stated that you would not talk to USAI without a lawyer present. On August 17, 2006, your lawyer advised against you participating in a Subject Interview to resolve the above allegations. On August 25, 2006, the investigation by the 902<sup>nd</sup> MI Group was terminated as unresolved.

On a Standard Form 86, signed by you on February 27, 2012, you listed employment at Prudential Financial from July 1999 to May 2009. You listed your reason for leaving as “terminated after filing ethical complaint.” During your interview with OPM on March 27, 2012, you stated that you accused your employer of “cooking the books” and filed a complaint against the company. You stated that the complaint was initially filed internally and you were fired for this action in May 2009. You then took the company to court with your complaint and they settled out of court with you in July 2010 for an undisclosed lump sum of money. You refused to disclose any further details, to include the courthouse where the record is located, stating that the case is confidential.

On a Standard Form 86, signed by you on April 16, 2019, you answered “no” to a question under Section 20A (Foreign Activities) that asked, “Have you, your spouse, or legally recognized civil union/domestic partner, cohabitant, or dependent children EVER owned, or do you anticipate owning, or plan to purchase real estate in a foreign country?” Conversely, during your interview with an Office of Personnel Management (OPM) investigator on May 15, 2019, you were asked this same question and you changed your answer to “yes.” You disclosed that you currently own farmland in the town of Ramallah, in the West Bank of Palestine that you inherited from your deceased mother, father, and uncle.

On several occasions during your military career, you have failed to fully cooperate and/or provide full and frank answers when prompted during the security screening process. Specifically, you were not fully cooperative during a CI investigation that began in 2003, and was terminated with unresolved concerns in 2006, following your unwillingness to participate in a Subject Interview. You were not fully candid with an OPM investigator during your subject interview in March 2012 when discussing your termination from Prudential Financial and the subsequent court proceedings. You asserted that all information was confidential, but you then refused to provide the investigator with details on the location of the courthouse to verify the suit and your claims, and this refusal impacted the investigator’s ability to fully explore and investigate this matter. Finally, you omitted critical information regarding your ownership of foreign real estate from your most recent Standard Form 86. Overall, you have displayed less than full candor in your dealings with investigators and during the investigative process, and your actions are indicative of questionable judgment, dishonesty, or unwillingness to comply with rules and regulations, which raises questions about your reliability, trustworthiness, and ability to protect classified or sensitive information. Therefore, your personal conduct is a security concern. (Guideline E, Attachment 6)

#### **GUIDELINE K: Handling Protected Information**

Available information shows issues of Handling Protected Information on your part.

Deliberate or negligent failure to comply with rules and regulations for handling protected information - which includes classified and other sensitive government information, and proprietary information - raises doubt about an individual’s trustworthiness, judgment, reliability, or willingness and ability to safeguard such information, and is a serious security concern.

Per the Adjudicative Guidelines, conditions that could raise a security concern and may be disqualifying include:

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An AIRR ROI, dated September 23, 2008, revealed that a source with 744<sup>th</sup> Military Police (MP) Battalion was interviewed on three occasions between September 11, 2003 and January 13, 2005. The source provided that your personal effects that were returned from Iraq contained several documents marked "SECRET," two notebooks containing what appeared to be Arabic language writing, and a floppy disk.

On December 19, 2003 and December 26, 2003, a second source was interviewed to clarify your activities while assigned to HHC 744<sup>TH</sup> MP ON. The source provided that you improperly stored a classified laptop in your quarters. You addressed this allegation during interviews conducted with an investigator(s) on January 12, 2004 and February 2, 2004. You stated that you were issued a SECRET laptop to type reports. You kept this laptop in your living quarters in a double-locked metal closet. You stated that the only time that this item was out of your possession was when you were on leave. While on leave, your unit contacted you to inquire about the laptop for inventory purposes. You provided the combination to the cabinet and your unit secured the laptop.

On November 16, 2004, an additional source was interviewed and confirmed that you stored your classified laptop in your quarters that you shared with two Kuwaiti nationals. You used that laptop to prepare your reports, which you classified as "SECRET."

The above information indicates that you knowingly and deliberately stored a SECRET laptop in your personal quarters in Iraq that you shared with two Kuwaiti foreign nationals. This blatant disregard for the protection of classified government equipment, combined with information that your personal effects from Iraq contained documents marked "SECRET," indicates that you failed to properly protect classified or sensitive information and that you engaged in lax security practices while serving overseas. Your actions raise doubt regarding your trustworthiness, judgment, reliability, or willingness and ability to safeguard protected information. Therefore, your mishandling of protected information is a security concern. (Guideline K, Attachment 6)

**List of Pertinent Documents**

Office of Personnel Management, Tier 5 Reinvestigation, Case #1920623247, January 8, 2020

Office of Personnel Management, Single Scope Background Investigation-Periodic Reinvestigation, Case #1220440232, August 1, 2012

Army Investigative Records Repository, File No. 328606725W, 2008

**Statement of Reasons Receipt and Statement of Intent (Subject)**

I, MSG Deen N. Haleem, [REDACTED], acknowledge that I have received the Statement of Reasons (SOR) notifying me of the Department of Defense Consolidated Adjudications Facility's preliminary decision to revoke my eligibility for access to classified information and/or assignment to duties that have been designated national security sensitive and deny my eligibility for access to Sensitive Compartmented Information (SCI). I understand that this form must be returned to my organization's Security Management Office (SMO) or SCI SMO within ten (10) calendar days.

I will (select one):

- NOT submit a reply to the SOR. I understand that by making this choice, this preliminary decision will become a final determination based on the merits of the available information.
  
- Submit a response via my organization's SMO or SCI SMO within sixty (60) calendar days of the date I acknowledged receipt of the SOR. I understand that if my response is not received by the SMO or SCI SMO within the sixty (60) calendar days, or later date as provided in a valid extension of time, this preliminary decision will become a final determination based on the merits of the available information.

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

## National Security Law Firm

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*

March 28, 2022

**Via Email Dcsa.meade.dcsa-dvd.mbx.dodcaf-industry-response@mail.mil and Certified Mail:RRR**

Department of Defense  
Consolidated Adjudications Facility  
Building 600, 10th Street  
Fort George G. Meade, MD 20755-5615

**Re: Deen Haleem - xxx-xx-██████████  
Eligibility for Access to Classified Information**

Dear Sir/Madam:

As you are aware, this office has been retained to represent Deen Haleem in connection with the Statement of Reasons dated February 8, 2022 and signed for by our client on February 18, 2022. Your office was kind enough to grant an extension of the suspense date through April 18, 2022.

Following our initial letter of representation to your offices, we immediately provided FOIA requests to DCSA and the Department of the Army on February 23, 2022. . It should be noted that our office initially wrote to the Department of U.S. Army on February 23, 2022 with an expedited FOIA request for specific information pertaining to Mr. Haleem. On February 24, 2022, the Department of U.S. Army indicated that our request did not warrant an expedited response. Our office filed an immediate appeal with the Department on February 28, 2022. As of today's date, we have yet to receive the requested information. A copy of the appeal is attached as reference.

Likewise, our office filed a FOIA request to DCSA dated February 23, 2022 which included a request for copies of specific investigation reports which were named in the original Statement of Reasons dated February 8, 2022. To date, we are still awaiting these documents as well. It is imperative that our office receive this documentation in order to properly represent our client and provide a response. For this reason, we are requesting an extension of sixty (60) days through **June 18, 2022**.

I would ask that you kindly acknowledge receipt of this letter and your consent for the extension of time to respond following our receipt of the requested, underlying materials.

I thank you in advance for your anticipated cooperation.

Very truly yours,

*/s/ Brett J. O'Brien*  
Brett J. O'Brien

BO/yml



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*\*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: MSG Deen N. Haleem  
[REDACTED]

Revocation of Security Clearance for Classified Information

Dear Sir/Madam:

Please be advised that this office represents MSG Deen Haleem in connection with the revocation of security clearance for classified information. We are in receipt of your letter dated February 24, 2022 and attached hereto for reference (Exhibit A).

Please accept this letter as our appeal for the denial of our expedited request. On February 8, 2022, Mr. Haleem received the Statement of Reasons from the Department of Defense concerning the revocation of his security clearance for classified information. Mr. Haleem retained our office to assist him in this matter on February 17, 2022 and we immediately forwarded the attached FOIA request seeking to obtain a copy of the entire investigative file on an expedited basis. (Exhibit B).

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 security clearance denial is April 18, 2022 having been granted a sixty (60) day extension to obtain these records. On February 24, 2022, our office received the attached letter indicating that your office was unable to comply with the statutory 20-day time limit and that our client "may consider this delay an administrative denial" denying our request for expedited processing. (Exhibit A).

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. One of the exceptions for the processing of an expedited FOIA request 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 furthering refining our search to specifically ask for the following:

1. All DD 5248s submitted regarding Deen Haleem;
2. All Questionable Intelligence Activity Reports submitted regarding Deen Haleem;
3. All investigations and close out actions related to the Questionable Activity Reports;
4. All counseling restricting access for security violations regarding Deen Haleem;
5. All retraining requirements for security violations Deen Haleem;
6. All counseling statements related to alleged security violations;
7. Any documents, reports, Serious Incident Reports, counterintelligence investigations and related findings regarding Deen Haleem.
8. It should be noted that both Deen Haleem and CPT Ferguson, George IV – were assigned to the 744<sup>th</sup> Military Police Battalion, which fell under the 800<sup>th</sup> Military Police BDE. CPT Ferguson was the S-2 officer.

We are therefore requesting that our expedited FOIA request be granted and 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: Deen Haleem



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

**FEB 24, 2022**

Freedom of Information/  
Privacy Office

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

Dear Mr. O'Brien:

This responds to your Privacy Act (PA) request of February 21, 2022, on behalf of your client MSG Deen N. Haleem for copies of all records pertaining to him held by the United States Army Intelligence and Security Command. Your clients request was received in this office on February 24, 2022.

Since additional time is needed to review and coordinate the records, we are unable to comply with the statutory 20-day time limit in processing your clients request. Therefore, your client may consider this delay an administrative denial or your client may agree to wait for a substantive reply upon completion of our coordination. Your clients agreement to waive the statutory time limit does not prejudice his right to appeal any releasability decision after it is made.

This denial is 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 PA. Your client may appeal this decision to the Secretary of the Army. If your client wishes to file an appeal, he should forward it to this office. Your clients appeal must be postmarked no later than 90 calendar days from the date of this letter (excepting Saturdays, Sundays and legal public holidays). The mailing address is:

Commander  
U.S. Army Intelligence and Security Command  
Freedom of Information/Privacy Office  
2600 Ernie Pyle Street, Room 3S02-B  
Fort George G. Meade, Maryland 20755-5995

If your client has any questions regarding this action, he should feel free to 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 #0143P-22. Please note that your client 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>.

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Please refer to FOIA Control Number: FA-22-011925. Your client may also contact the INSCOM FOIA Public Liaison, Mrs. Joanne Benear, for further assistance and to discuss any aspect of his request at 301-677-7856. Additionally, your client 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 202-741-5700; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

Sincerely,  
HEATON.MICH  
AEL.TODD.116  
0922075

Digitally signed by  
HEATON.MICHAELTODD.  
1160922075  
Date: 2022.02.24 14:18:42  
-05'00'

Michael T. Heaton  
Director  
Freedom of Information/Privacy Office  
Investigative Records Repository

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

February 21, 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: MSG Deen N. Haleem

  
Revocation of Security Clearance for Classified Information

Dear Sir/Madam:

Please be advised that I have been retained to represent MSG Deen N. Haleem. On his behalf, I am requesting all records pertaining to MSG Haleem held by the United States Army Intelligence and Security Command.

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 on January 12, 2004 and February 2, 2004.
- 5) A complete copy of the investigation report initiated on September 5, 2003 by the 902nd Military Intelligence Group which was terminated on August 25, 2006.

- 6) A copy of all DD 5248s; 15-6 investigations related to the following incidents noted in the Statement of Reasons dated February 8, 2022:
- Report of investigation dated September 23, 2008 revealing investigation initiated on September 5, 2003 by the 902nd Military Intelligence Group to determine whether MSG Haleem was involved with or supported a Foreign Intelligence Service or International Terrorist Organization.
  - A source with the 744th Military Police Battalion interviewed on four occasions between September 11, 2003 and December 18, 2003 indicating that MSG Haleem had not completed necessary training in order to carry a badge and credentials as a CI Agent; indicating that MSG Haleem had removed his name tag and rank from his uniform without authorization and conducted interrogations in Arabic without providing interpretation to the assigned interrogators. The purchase of a Thuraya satellite phone for personal use while in Kuwait and his unauthorized contact with Enemy Prisoners of War.
  - A source with the 744th Military Police Battalion was interviewed on three occasions between September 11, 2003 and January 13, 2005 indicating that while in Kuwait, MSG Haleem attempted to obtain authorization for off-post travel utilizing a Non-Tactical Vehicle (NTV) without a proper license. The source indicating that he changed the status of EPWs to civilian and took them off post. Further on October 10, 2003, a source interviewed confirmed that MSG Haleem classified military EPWs as civilians and operated a NTV not obtained through his brigade. The source further noted that MSG Haleem left unidentified Arab men unattended for several hours in a restricted area of the compound.
  - A source interviewed between December 19, 2003 and December 26, 2003 indicated that a Marine unit had warned 744th MP BN that MSG Haleem continued to conduct source operations in their area of operations and that he was counseled for not being in appropriate uniform or utilized unauthorized badges.
  - Full copies of the interviews conducted on January 12, 2004 and February 2, 2004.
  - A source interviewed on January 16, 2004 advised that MSG Haleem had requested information pertaining to Kuwaiti prisoners in Iraq and that MSG Haleem asked the source if he could get money to pay for the information. The source provided points of contact in the U.S. Embassy in Kuwait.
  - An instructor was interviewed on February 18, 2004 concerning scope and requirements to become a 97B Counterintelligence Agent in the Reserves.
  - A copy of the records check from February 19, 2004 conducted at the 6th BN, 98th DIV to determine whether MSG Haleem had completed the 97B MOS training.

- A source interviewed on November 16, 2004 to confirm or refute allegations concerning conducting unauthorized source operations in Iraq indicated that MSG Haleem submitted reports containing information from sources. Additional information from the source that they had heard several times over the radio in the Tactical Operations Center that there were "sources" at the compound gate who sought to speak with MSG Haleem. Further this source indicated that MSG Haleem maintained a classified laptop in his quarters.
  - Information pertaining to the inheritance of property located in Ramallah, West Bank of Palestine by MSG Haleem and copies of the interview with the Office of Personnel Management investigator.
  - An AIRR ROI dated September 23, 2008 indicated that a source with 744th Military Police Battalion interviewed between September 11, 2003 and January 13, 2005 that MSG Haleem had personal effects returned from Iraq containing several documents marked SECRET and two notebooks containing Arabic language and a floppy disc.
  - A source was interviewed on December 19, 2003 and December 26, 2003 indicating that MSG Haleem had improperly stored a classified laptop.
  - A source was interviewed on November 16, 2004 indicating that MSG Haleem stored a classified laptop in his quarters shared with two Kuwaiti nationals.
- 7) A copy of testimony given by Dennis McGlone concerning the investigation of the 2003-2004 allegations.
- 8) 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.**

**MSG Deen Haleem's verification of identity:**

Full Name: [REDACTED]

Social Security [REDACTED]

Date of Birth: [REDACTED]

Place of Birth: [REDACTED]

Address: [REDACTED]

**Agreement to pay fees:**

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

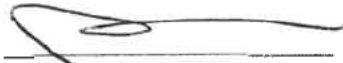
**Preferred delivery method:**

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

**MSG Deen Haleem'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.



MSG Deen Haleem

2/21/22

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/ymf  
Cc: Deen Haleem





## **DCSA Ft Meade CAF Mailbox Industry Response**

---

**From:** Yolande Liddy <yolande@nationalsecuritylawfirm.com>  
**Sent:** Wednesday, April 6, 2022 4:46 PM  
**To:** DCSA Ft Meade CAF Mailbox Industry Response  
**Cc:** (b) (6)  
**Subject:** [Non-DoD Source] National Security Law Firm-IMO: Deen Haleem-EXTENSION REQUEST-URGENT  
**Attachments:** Haleem - EXTENSION REQUEST - 3-28-22 -National Security Law Firm Mail - National Security Law Firm-IMO\_ Deen Haleem-EXTENSION REQUEST.pdf

Sir/Madam: As you know this office represents Deen Haleem. On March 28, 2022, our office forwarded the attached request for an extension on the current suspense date of April 18, 2022. As noted in our letter, we have yet to receive the underlying documents from INSCOM relating to the investigation of our client. While we received the FOIA documents through DCSA, there were documents relating to an FBI investigation that we are seeking at this time. Our office has forwarded a separate FOIA to the FBI on today's date. I would ask that you forward this email with the attached request of March 28, 2022 to the adjudicator for consent to the extension request.

**Please acknowledge receipt of this email and advise of the consent for additional time. Thank you.**

Yolande M. Liddy  
Paralegal  
**National Security Law Firm**  
1250 Connecticut Avenue, NW  
Suite 700  
Washington, DC 20036  
Phone: 202-600-4996  
Fax: 202-545-6318  
Email: [yolande@nationalsecuritylawfirm.com](mailto:yolande@nationalsecuritylawfirm.com)

# EXHIBIT E

## National Security Law Firm

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 21, 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: MSG Deen N. Haleem

SS# [REDACTED]

Revocation of Security Clearance for Classified Information

Dear Sir/Madam:

Please be advised that I have been retained to represent MSG Deen N. Haleem. On his behalf, I am requesting all records pertaining to MSG Haleem held by the United States Army Intelligence and Security Command.

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 on January 12, 2004 and February 2, 2004.
- 5) A complete copy of the investigation report initiated on September 5, 2003 by the 902nd Military Intelligence Group which was terminated on August 25, 2006.

- 6) A copy of all DD 5248s; 15-6 investigations related to the following incidents noted in the Statement of Reasons dated February 8, 2022:
- Report of investigation dated September 23, 2008 revealing investigation initiated on September 5, 2003 by the 902nd Military Intelligence Group to determine whether MSG Haleem was involved with or supported a Foreign Intelligence Service or International Terrorist Organization.
  - A source with the 744th Military Police Battalion interviewed on four occasions between September 11, 2003 and December 18, 2003 indicating that MSG Haleem had not completed necessary training in order to carry a badge and credentials as a CI Agent; indicating that MSG Haleem had removed his name tag and rank from his uniform without authorization and conducted interrogations in Arabic without providing interpretation to the assigned interrogators. The purchase of a Thuraya satellite phone for personal use while in Kuwait and his unauthorized contact with Enemy Prisoners of War.
  - A source with the 744th Military Police Battalion was interviewed on three occasions between September 11, 2003 and January 13, 2005 indicating that while in Kuwait, MSG Haleem attempted to obtain authorization for off-post travel utilizing a Non-Tactical Vehicle (NTV) without a proper license. The source indicating that he changed the status of EPWs to civilian and took them off post. Further on October 10, 2003, a source interviewed confirmed that MSG Haleem classified military EPWs as civilians and operated a NTV not obtained through his brigade. The source further noted that MSG Haleem left unidentified Arab men unattended for several hours in a restricted area of the compound.
  - A source interviewed between December 19, 2003 and December 26, 2003 indicated that a Marine unit had warned 744th MP BN that MSG Haleem continued to conduct source operations in their area of operations and that he was counseled for not being in appropriate uniform or utilized unauthorized badges.
  - Full copies of the interviews conducted on January 12, 2004 and February 2, 2004.
  - A source interviewed on January 16, 2004 advised that MSG Haleem had requested information pertaining to Kuwaiti prisoners in Iraq and that MSG Haleem asked the source if he could get money to pay for the information. The source provided points of contact in the U.S. Embassy in Kuwait.
  - An instructor was interviewed on February 18, 2004 concerning scope and requirements to become a 97B Counterintelligence Agent in the Reserves.
  - A copy of the records check from February 19, 2004 conducted at the 6th BN, 98th DIV to determine whether MSG Haleem had completed the 97B MOS training.



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

**MSG Deen Haleem'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.

  
\_\_\_\_\_  
MSG Deen Haleem

2/21/22  
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: Deen Haleem





# EXHIBIT F



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

FEB 24, 2022

Freedom of Information/  
Privacy Office

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

Dear Mr. O'Brien:

This responds to your Privacy Act (PA) request of February 21, 2022, on behalf of your client MSG Deen N. Haleem for copies of all records pertaining to him held by the United States Army Intelligence and Security Command. Your clients request was received in this office on February 24, 2022.

Since additional time is needed to review and coordinate the records, we are unable to comply with the statutory 20-day time limit in processing your clients request. Therefore, your client may consider this delay an administrative denial or your client may agree to wait for a substantive reply upon completion of our coordination. Your clients agreement to waive the statutory time limit does not prejudice his right to appeal any releasability decision after it is made.

This denial is 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 PA. Your client may appeal this decision to the Secretary of the Army. If your client wishes to file an appeal, he should forward it to this office. Your clients appeal must be postmarked no later than 90 calendar days from the date of this letter (excepting Saturdays, Sundays and legal public holidays). The mailing address is:

Commander  
U.S. Army Intelligence and Security Command  
Freedom of Information/Privacy Office  
2600 Ernie Pyle Street, Room 3S02-B  
Fort George G. Meade, Maryland 20755-5995

If your client has any questions regarding this action, he should feel free to 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 #0143P-22. Please note that your client 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>.

-2-

Please refer to FOIA Control Number: FA-22-011925. Your client may also contact the INSCOM FOIA Public Liaison, Mrs. Joanne Benear, for further assistance and to discuss any aspect of his request at 301-677-7856. Additionally, your client 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 202-741-5700; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

Sincerely,

HEATON.MICH

AEL.TODD.116

0922075

Digitally signed by  
HEATON.MICHAEL.TODD.

1160922075

Date: 2022.02.24 14:18:42  
-05'00'

Michael T. Heaton

Director

Freedom of Information/Privacy Office

Investigative Records Repository

# EXHIBIT G

# National Security Law Firm

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 28, 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: MSG Deen N. Haleem

SS#: [REDACTED]

Revocation of Security Clearance for Classified Information

Dear Sir/Madam:

Please be advised that this office represents MSG Deen Haleem in connection with the revocation of security clearance for classified information. We are in receipt of your letter dated February 24, 2022 and attached hereto for reference (Exhibit A).

Please accept this letter as our appeal for the denial of our expedited request. On February 8, 2022, Mr. Haleem received the Statement of Reasons from the Department of Defense concerning the revocation of his security clearance for classified information. Mr. Haleem retained our office to assist him in this matter on February 17, 2022 and we immediately forwarded the attached FOIA request seeking to obtain a copy copy of the entire investigative file on an expedited basis. (Exhibit B).

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 security clearance denial is April 18, 2022 having been granted a sixty (60) day extension to obtain these records. On February 24, 2022, our office received the attached letter indicating that your office was unable to comply with the statutory 20-day time limit and that our client "may consider this delay an administrative denial" denying our request for expedited processing. (Exhibit A).

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. One of the exceptions for the processing of an expedited FOIA request 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 furthering refining our search to specifically ask for the following:

1. All DD 5248s submitted regarding Deen Haleem;
2. All Questionable Intelligence Activity Reports submitted regarding Deen Haleem;
3. All investigations and close out actions related to the Questionable Activity Reports;
4. All counseling restricting access for security violations regarding Deen Haleem;
5. All retraining requirements for security violations Deen Haleem;
6. All counseling statements related to alleged security violations;
7. Any documents, reports, Serious Incident Reports, counterintelligence investigations and related findings regarding Deen Haleem.
8. It should be noted that both Deen Haleem and CPT Ferguson, George IV – were assigned to the 744<sup>th</sup> Military Police Battalion, which fell under the 800<sup>th</sup> Military Police BDE. CPT Ferguson was the S-2 officer.

We are therefore requesting that our expedited FOIA request be granted and 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: Deen Haleem

# EXHIBIT H

**National Security Law Firm**

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*

May 23, 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: MSG Deen N. Haleem

SS#:



Clearance for Classified Information

Dear Sir/Madam:

Please be advised, as previous correspondence indicates, that this office represents MSG Deen Haleem in connection with the revocation of security clearance for classified information.

Our office has submitted an expedited FOIA request in addition to two formal appeals for information. We request information be provided as obtained and redacted as it is imperative that our office receive these documents in order to properly represent our client's interests. As our former appeals have illustrated, one of the exceptions for the processing of an expedited FOIA request 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 furthering refining our search to specifically ask for the following:

1. All DD 5248s submitted regarding Deen Haleem;
2. All Questionable Intelligence Activity Reports submitted regarding Deen Haleem;
3. All investigations and close out actions related to the Questionable Activity Reports;
4. All counseling restricting access for security violations regarding Deen Haleem;
5. All retraining requirements for security violations Deen Haleem;
6. All counseling statements related to alleged security violations;
7. Any documents, reports, Serious Incident Reports, counterintelligence investigations and related findings regarding Deen Haleem.



8. It should be noted that both Deen Haleem and CPT Ferguson, George IV – were assigned to the 744<sup>th</sup> Military Police Battalion, which fell under the 800<sup>th</sup> Military Police BDE. CPT Ferguson was the S-2 officer.

We are therefore requesting that the information requested be provided as obtained and redacted and the underlying materials forwarded as provided by statute.

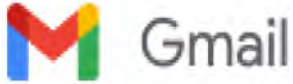
If you wish to discuss this matter further, please do not hesitate to contact the undersigned.

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

BO/yml

Cc: Deen Haleem

# EXHIBIT I



Cara Sliger <cara@nationalsecuritylawfirm.com>

---

## Deen Haleem

1 message

---

**Brett O'Brien** <brett@nationalsecuritylawfirm.com>

Thu, Jun 23, 2022 at 7:49 PM

To: usarmy.meade.902-mi-grp.mbx.inscom-foia-service-center@army.mil

Cc: Yolande Liddy <yolande@nationalsecuritylawfirm.com>, Cara Sliger <cara@nationalsecuritylawfirm.com>

To Whom It May Concern:

I am requesting an update on our FOIA request for MSG Deen Haleem. Please advise at your earliest convenience.

Warm regards,

Brett

--

Brett O'Brien

National Security Law Firm, LLC

[1250 Connecticut Ave, NW](#)

[Suite 700](#)

[Washington, DC 20036](#)

(o) 202-600-4996

(f) 202-545-6318

[brett@nationalsecuritylawfirm.com](mailto:brett@nationalsecuritylawfirm.com)

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

This electronic mail (email) transmission is meant solely for the person(s) to whom it is addressed. It contains confidential information that may also be legally privileged. Any copying, dissemination or distribution of the contents of this email by anyone other than the addressee or his or her agent for such purposes is strictly prohibited. If you have received this email in error, please notify me immediately by telephone or email and purge the original and all copies thereof. Thank you.

# EXHIBIT J



**DEPARTMENT OF THE ARMY**  
**UNITED STATES ARMY INTELLIGENCE AND SECURITY COMMAND**  
**FREEDOM OF INFORMATION AND PRIVACY ACT OFFICE**  
2600 ERNIE PYLE STREET  
FORT MEADE, MD 20755-5995

July 1, 2022

Freedom of Information/  
Privacy Act Office

National Security Law Firm  
Attention: Mr. Brett J. O'Brien  
1250 Connecticut Avenue, Northwest  
Suite 700  
Washington, DC 20036

Dear Mr. O'Brien:

This responds to your Privacy Act (PA) request of February 21, 2022, on behalf of your client Mr. Deen N. Haleem, to the Defense CounterIntelligence and Security Agency (DCSA) requesting a copy of your clients background investigation. On May 26, 2022, the DCSA forwarded your request and a record to this office and they were received on June 24, 2022.

Your clients Army intelligence investigative record was retrieved from a PA system of records by use of his personal identifying data. The record was processed under the PA, is partially releasable and enclosed.

Records pertaining to you were located in the Department of Defense (DoD) Consolidated Adjudications Facility (CAF). The CAF records, for which we have release authority have been reviewed, determined to be \_\_\_\_\_ and are enclosed.

Records were retrieved from a system of records by use of your clients personal identifying data, we processed them under the PA. Your clients access rights under the PA are limited to information about him. Information has been withheld in accordance with Title 5 U.S. Code 552a(b) and (d). This information has also been determined to not constitute an accessible "record" about your client under Title 5 U.S. Code 552a(d)(1) and (a)(4). The information has also been reviewed under the Freedom of Information Act (FOIA) and has been determined to be exempt according to Title 5 U.S. Code 552(b)(6). (see attached appeal rights)

In making our checks, the DCII indicated the \_\_\_\_\_ may have information pertaining to you. Therefore, a copy of your request and this letter are being forwarded to that office for necessary action and direct reply to you.

-2-

In making our checks, the DCII indicated the \_\_\_\_\_ and the \_\_\_\_\_ may have information pertaining to you. Therefore, a copy of your request and this letter are being forwarded to those offices for necessary action and direct reply to you.

In making our checks, the DCII indicated the \_\_\_\_\_ may have a \_\_\_\_\_ file concerning you. If you desire a copy of these records, please write directly to that agency. (see attached mailing address)

\_\_\_\_\_ under the purview of the \_\_\_\_\_ were identified in your Army file. We do not have release authority for this information; therefore, we are referring your request, the \_\_\_\_\_ and this letter to that command for necessary action and direct reply to you.

Records that originated with the Office of Personnel Management were identified in your clients record . We do not have release authority for these records; therefore, we are referring your request and this letter to that office for necessary action and direct reply to you.

Your letter revealed that you used official letterhead to request information contained in your investigative file. Under the provisions of the PA, requests submitted on official letterhead and/or mailed in envelopes designated for "Official Business" are prohibited. Please be advised that future correspondence using official letterhead and/or envelopes cannot be processed by this office and will be returned to you.

Other:

If your client has any questions regarding this action, he should feel free to 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 #0275P-22. Please note that your client 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>. Please refer to FOIA Control Number: FP-22-021796. Your client may also contact the INSCOM FOIA Public Liaison, Mrs. Joanne Benear, for any further assistance and to discuss any aspect of his request at 301-677-7856. Additionally, your client 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.

-3-

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.MICHAEL

L.TODD.11609220

75

Michael T. Heaton

GG-15, Director

Freedom of Information/Privacy Act Office

Digitally signed by  
HEATON.MICHAEL.TODD.1160  
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-04'00'

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.



**DEPARTMENT OF THE ARMY**  
**US ARMY CENTRAL PERSONNEL SECURITY CLEARANCE FACILITY**  
**600 10<sup>th</sup> STREET SUITE 200**  
**FORT GEORGE G. MEADE, MARYLAND 20755-5250**

REPLY TO  
ATTENTION OF:

IACF-AD (0587)

MEMORANDUM FOR  
ATTN MR. STEVEN SCHOOLEY  
OFFICE OF PERSONNEL MANAGEMENT  
P O BOX 618  
1137 BRANCHTON ROAD  
BOYERS PA 16018-0618

26 June 2012

SUBJECT: Rejected investigation

1. Reference OPM SSBI-PR, case #1220440232 closed 19 June 2012, pertaining to: DEEN NIMER HALEEM, [REDACTED]
2. Request OPM investigation be reopened/RSI to discuss 50 pages of Fincen reports.
3. Current location/contact information for Subject and Security Manager: subject is located at: [REDACTED] 28310, Security manager is: Lloyd Perry, 910-570-8488.
4. Point of contact for this action is Denise Howeth, 410-282-7438.

FOR THE COMMANDER:

HOWETH.DENISE.RA	b6
CHELLE	

Denise Howeth  
Adjudicator, Team D1  
Adjudications Division

~~FOR OFFICIAL USE ONLY~~  
This document contains information EXEMPT  
FROM MANDATORY DISCLOSURE under the FOIA. Exemption 6 applies.

# EXHIBIT K



**DEPARTMENT OF THE ARMY**  
**UNITED STATES ARMY INTELLIGENCE AND SECURITY COMMAND**  
**FREEDOM OF INFORMATION AND PRIVACY ACT OFFICE**  
2600 ERNIE PYLE STREET  
FORT MEADE, MD 20755-5995

September 21 2022

Freedom of Information/  
Privacy Office

National Security Law Firm, LLC  
Attention: Mr. Brett O'Brien  
1250 Connecticut Avenue, NW  
Suite 700  
Washington, DC 20036

Dear Mr. O'Brien:

This is in further response to your Privacy Act (PA) request of June 22, 2022, on behalf of your client Mr. Deen Haleem and supplements our letter of July 6, 2022.

Coordination with another element of this command has been completed and records returned to this office. The records have been reviewed in accordance with Executive Order (EO) 13526. As a result of our Information has been withheld in from the records 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 FOIA per Title 5 U.S. Code 552 (b)(6).

The withholding of the information described above is a partial denial of your clients request. This denial is 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 PA. Your client has the right to appeal this response to the Secretary of the Army. If your client wishes to file an appeal, he should forward it to this office. Your clients appeal must be postmarked no later than 90 calendar days from the date of this letter (excepting Saturdays, Sundays and legal public holidays). An appeal may not serve as a request for additional or new information. An appeal may only address information denied in this response. Your clients' 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. The mailing address is:

Commander  
U.S. Army Intelligence and Security Command  
Freedom of Information/Privacy Office (APPEAL)  
2600 Ernie Pyle Street  
Suite 3S02-B  
Fort George G. Meade, Maryland 20755-5995

-2-

Additionally, we are still coordinating a search for records with other agencies. You will be contacted in separate correspondence upon completion of our coordination.

If your client has any questions regarding this action, he should feel free to 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 #0283P-22. Please note that your client 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>. Please refer to FOIA Control Number: FP-22-022336. Your client may also contact the INSCOM FOIA Public Liaison, Mrs. Arleen Colon, for any further assistance and to discuss any aspect of his request at 301-677-7856. Additionally, your client 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.116  
0922075

Digitally signed by  
HEATON.MICHAEL.TODD.  
1160922075  
Date: 2022.09.21 13:14:02  
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Michael T. Heaton  
GG-15, Director  
Freedom of Information/Privacy Act Office

Enclosure

# EXHIBIT L



DEPARTMENT OF THE ARMY  
UNITED STATES ARMY INTELLIGENCE AND SECURITY COMMAND  
FREEDOM OF INFORMATION AND PRIVACY ACT OFFICE  
2600 ERNIE PYLE STREET  
FORT MEADE, MD 20755-5995

September 29, 2022

Freedom of Information/  
Privacy Office

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

Dear Mr. O'Brien:

This is in further response to your Privacy Act (PA) request of February 21, 2022, on behalf of your client and supplements our letter of February 21, 2022.

Coordination with another element of this command has been completed and records returned to this office. The records have been reviewed in accordance with Executive Order (EO) 13526. As a result of our review 113 pages have been deleted in their entirety as it is not reasonable to segregate information from the withheld pages. Information has been sanitized according to Title 5 U.S. Code 552 (b)(3) the statute invoked is 50 U.S.C. § 3024(i), which allows for the protection of intelligence sources and methods.

Your client's access rights under the PA are limited to information about him. Information has been withheld in accordance with Title 5 U.S. Code 552a(b) and (d). This information has also been determined to not constitute an accessible "record" about your client under Title 5 U.S. Code 552a(d)(1) and (a)(4). The information has also been reviewed under the Freedom of Information Act (FOIA) and has been determined to be exempt according to Title 5 U.S. Code 552(b)(6) and (b)(7)(C).

In addition, information has been sanitized from the record that would reveal sensitive investigative methods and techniques. This information is exempt from public disclosure pursuant to Title 5 U.S. Code 552a (k)(2) of the PA and Title 5 U.S. Code 552 (b)(7)(E) of the FOIA. The significant and legitimate governmental purpose to be served by withholding is that a viable and effective intelligence investigative capability is dependent upon protection of sensitive investigative methodologies.

The withholding of the information described above is a partial denial of your client's request. This denial is 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 may be appealed to the Secretary of the Army. If your client decides to appeal at this time, his 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 your client from filing litigation in the courts.

-2-

Your client should state the basis for his disagreement with the response and he should provide justification for an additional 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 client's 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  
Suite 3S02-B  
Fort George G. Meade, Maryland 20755-5995

Additionally, information under the purview of the U.S. Army Reserves Command were identified in your clients records. We do not have release authority for this information. Therefore, the records, your clients request and a copy of this letter are being forwarded to that command for action and direct reply to your client. Should your client wish to contact them the address is:

Commander  
U.S. Army reserve Command  
Attention: AFRC-PRS FOIA/Privacy Act)  
Building 8-1808, 4710 Knox Street  
Fort Bragg, North Carolina 28310-5000

If your client has any questions regarding this action, he should feel free to 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 #0143P-22. Please refer to FOIA Control Number: FP-22-011925. Your client may also contact the INSCOM FOIA Public Liaison, Mrs. Arleen Colon, for any further assistance and to discuss any aspect of his request at 301-677-7856. Additionally, your client 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.MICHAEL  
TODD.1160922075

Digitally signed by  
HEATON.MICHAEL.TODD.1160  
922075  
Date: 2022.09.29 11:56:25  
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Michael T. Heaton  
GG-15, Director  
Freedom of Information/Privacy Office

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.

# EXHIBIT M

# National Security Law Firm

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.*

April 6, 2022

Department of Justice  
Office of Information Policy  
Sixth Floor, 441 G. Street, NW  
Washington DC 20530-0001  
Freedom of Information Appeal

RE: Our Client: MSG Deen N. Haleem

SS#: [REDACTED]

Revocation of Security Clearance for Classified Information

Dear Sir/Madam:

Please be advised that I have been retained to represent MSG Deen N. Haleem. On his behalf, I am requesting all records pertaining to MSG Haleem held by the Federal Bureau of Investigations. On March 22, 2022, the Defense Counterintelligence and Security Agency forwarded to your office certain information that was redacted from their response to our FOIA request. (See copy of letter dated March 22, 2022 and March 23, 2022 letter indicating information that was redacted concerning the FBI)

**If it is determined that any of the documents are classified, we are requesting an immediate declassification review.**

**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.

**MSG Deen Haleem's verification of identity:**

Full Name: [REDACTED]

Social Security: [REDACTED]

Date of Birth: [REDACTED]

Place of Birth: [REDACTED]

Address: [REDACTED]

**Agreement to pay fees:**

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

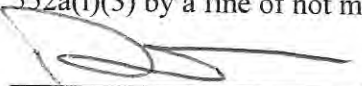
**Preferred delivery method:**

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

**MSG Deen Haleem'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 Department of Justice 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.



MSG Deen Haleem

3/6/22

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: Deen Haleem



**DEFENSE COUNTERINTELLIGENCE AND SECURITY AGENCY**  
27130 TELEGRAPH ROAD  
QUANTICO, VA 22134-2253

March 25, 2022

National Security Law Firm  
Attn: Brett John O'Brien  
1250 Connecticut Avenue  
Suite 700  
Washington, DC 20036

Re: Deen Nimer Haleem

Dear Mr. O'Brien:

This is in reference to Deen Namir Haleem's request that a copy of their background investigations, standard forms and interagency/intra-agency records/correspondence be provided to your office. Two requests were received by the Department of Defense, Defense Counterintelligence and Security Agency (DCSA), Freedom of Information and Privacy Act (FOI/PA) office on March 8, 2022 and March 14, 2022.

We are unable to make an accurate search of our records for "interagency and intra-agency correspondence" without additional information from you. Please submit a new request and describe the type of correspondence you seek.

We have provided a complete copy of Mr. Haleem's investigative file. We reviewed the enclosed documents in accordance with the Freedom of Information Act (FOIA) and the Privacy Act of 1974, as amended.

At the time of Deen Namir Haleem's background investigation, we obtained information from the Naval Criminal Investigative Service. To obtain these records, he may submit a Privacy Act request by following the procedures on their website, <https://www.ncis.navy.mil/Resources/FOIA/>, or by writing to: NCISHQ, Code OOLJF, Russell-Knox Building, 27130 Telegraph Road, Quantico, VA 22134.

Deen Namir Haleem's investigative file also contains information that is the property of the Federal Bureau of Investigation (FBI). We referred this information and a copy of the request for an access decision and the FBI will respond directly to you. We enclosed a copy of our correspondence to the FBI. You may contact them at that address for information about this referral or refer to their website for additional information:  
<https://www.fbi.gov/services/information-management/foipa/requesting-fbi-records>.

Deen Namir Haleem's investigative file contains information that originated with the Army Investigative Records Repository (AIRR). The DCSA FOIP Office for Adjudications will coordinate the referral of this information and that agency will respond to you directly.

At the time of Deen Namir Haleem's background investigation, the investigative file contained information on Nargiss Nimer Abdelmuti, Haleem Nimer Nofa, Abdelrazak Abdelhaleem and Noha Abuswalim that originated with another federal agency. We withheld this information pursuant Privacy Act exemption (k)(2) and FOIA exemptions (b)(6) and (b)(7)(C). Privacy Act

National Security Law Firm  
Attn: Brett John O'Brien  
Deen Nimer Haleem

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exemption (k)(2) protects investigatory material compiled for law enforcement purposes that, if released, might interfere with a civil or administrative action, or investigation, and result in the unwarranted invasion of personal privacy of others. FOIA exemptions (b)(6) and (b)(7)(C) protect information from release that could reasonably be expected to cause an unwarranted invasion of privacy to third-parties.

We cannot consider release of this information until we receive a written statement from the above referenced individual(s) authorizing the release of this information directly to you. The statement must contain either an original notarized authorization or an unsworn declaration in accordance with 28 U.S.C. 1746, in the following format: I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct. The declaration must contain a signature and date executed.

An original notarized authorization or declaration can be mailed to: Defense Counterintelligence and Security Agency, Attn: FOI/P Office, P.O. Box 618, 1137 Branchton Road, Boyers, PA 16018-0618. A declaration may be sent via unsecure fax to 724-794-4590 or emailed as an attachment to [dcsa.boyers.dcsa.mbx.inv-foip@mail.mil](mailto:dcsa.boyers.dcsa.mbx.inv-foip@mail.mil). Please ensure that the security of your email system is adequate before transmitting your request, which contains personally identifiable information (full name, social security number, date of birth, etc.).

We withheld information from document(s) 371 in accordance with FOIA exemption (b)(3) and Privacy Act exemption (j)(1). Exemption (b)(3) protects those records specifically exempt from release by statute, which in this case is Section 102A(i)(1) of the National Security Act of 1947, as amended. Exemption (j)(1) applies to systems of records maintained by the Central Intelligence Agency

You/ Deen Namir Haleem have the right to appeal this response by submitting a written request to the Defense Counterintelligence and Security Agency, ATTN: Office of General Counsel, 27130 Telegraph Road, Quantico, VA 22134. Clearly mark the outside of the envelope and your written appeal letter: "Privacy/FOIA Appeal". Your/his appeal must be received by DCSA within ninety (90) calendar days from the date of this letter to be considered timely. Your written appeal letter should include the reasons why the requested information should be released and why this action may be in error. Include with your appeal letter a copy of your original request and this response letter. Please reference tracking number DCSA-B 22-04594.

On behalf of the Financial Crimes Enforcement Network (FinCEN), we withheld document(s) 126-129, 260-368 and also portions of document(s) 1, 2, 4, 8, 9, 100, 130, 131, 133, 135, 136 and 138 in accordance with FOIA exemption (b)(3) and Privacy Act exemptions (j)(2) and (k)(2). Exemption (b)(3) protects those records that are specifically exempt from release by statute, which in this case is 31 U.S.C 5319. Privacy Act exemption (j)(2) allows for withholding information maintained by an agency or agency component whose main function pertains to enforcing criminal laws. Exemption (k)(2) protects investigative material compiled for law enforcement purposes, other than criminal, which did not result in loss of a right, benefit or privilege under federal programs.

National Security Law Firm  
Attn: Brett John O'Brien  
Deen Nimer Haleem

3

Deen Namir Haleem's may appeal FinCEN's action by submitting a written request to the following address within 90 days from the date of this letter: Financial Crimes Enforcement Network, Disclosure Office, P.O. Box 39, Vienna, VA 22183. Deen Namir Haleem's appeal should include the reasons why the requested information should be released and why this action may be in error. Attach a copy of his original request and this response letter and clearly mark the letters and the outside envelope, "FOIA Appeal." You may refer to their website for additional information: <https://www.fincen.gov/filing-privacy-act-request>.

On behalf of the Federal Bureau of Investigation (FBI), we withheld information on document(s) 3, 4, 6, 83, 85, 132, 137, 369 and 371 in accordance with Privacy Act exemption (j)(2) and FOIA exemption (b)(7)(E). Exemption (j)(2) allows for withholding information maintained by an agency or agency component whose main function pertains to enforcing criminal laws. Exemption (b)(7)(E) protects information that "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."


Appeals of the FBI's (j)(2), (b)(7)(E) redactions directly to the Department of Justice by submitting a written request to the Office of Information Policy, Sixth Floor, 441 G Street, NW, Washington, DC 20530-0001, or you may submit an appeal through OIP's eFOIA portal at <https://www.justice.gov/oip/submit-and-track-request-or-appeal>. The appeal must be received by OIP within ninety (90) days from the date of this letter to be considered timely. The envelope and letter should be marked "Freedom of Information Appeal."

The Office of Government Information Services (OGIS) was created to offer mediation services to resolve disputes between FOIA requesters and federal agencies as a non-exclusive alternative to litigation. You may contact OGIS in any of the following ways:

U.S. National Archives and Records Administration	Phone: 202-741-5770
Office of Government Information Services	Toll-Free: 1-877-684-6448
8601 Adelphi Road - OGIS	Fax: 202-741-5769
College Park, MD 20740-6001	Email: <a href="mailto:ogis@nara.gov">ogis@nara.gov</a>

If you have any questions regarding this response, contact the Freedom of Information and Privacy office at 724-794-5612 ext. 7000 and reference tracking number DCSA-B 22-04594.

Sincerely,



Lisa A. Desko  
Government Information Specialist

Enclosures





**DEFENSE COUNTERINTELLIGENCE AND SECURITY AGENCY**  
27130 TELEGRAPH ROAD  
QUANTICO, VA 22134-2253

March 22, 2022

Federal Bureau of Investigation  
Attn: Initial Processing Operations Unit  
Record/Information Dissemination Section  
200 Constitution Drive  
Winchester, VA 22602

Re: DEEN NIMER HALEEM  
[REDACTED]

Dear Sir/Madam:

In response to the FOIA/Privacy Act request we received from the above individual, we are forwarding information that belongs to your agency for your direct response to the requester (Enclosure A). We notified the requester of this action.

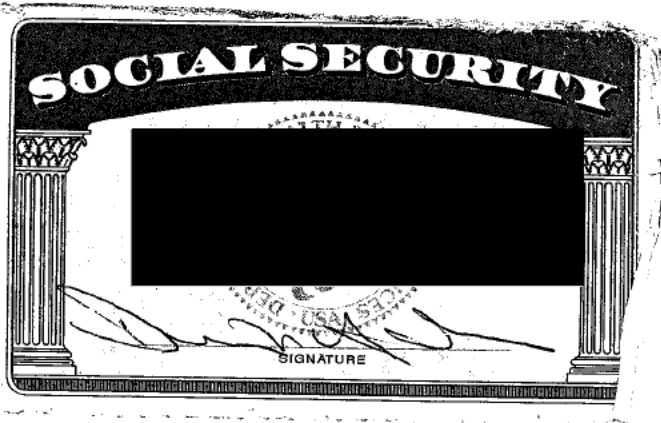
If you have any questions regarding this response, contact the Freedom of Information and Privacy office at 724-794-5612 ext. 7000 and reference tracking number DCSA-B 22-04594.

Sincerely,

A handwritten signature in cursive script, reading "Lisa A. Desko".

Lisa A. Desko  
Government Information Specialist

Enclosures



# EXHIBIT N



U.S. Department of Justice

**Federal Bureau of Investigation**  
Washington, D.C. 20535

April 8, 2022

MR. BRETT JOHN O'BRIEN, ESQUIRE  
NATIONAL SECURITY LAW FIRM  
SUITE 700  
1250 CONNECTICUT AVENUE, NORTHWEST  
WASHINGTON, DC 20036

FOIPA Request No.: 1531095-000  
DCSA Tracking No.: 22-04594  
Subject: HALEEM, DEEN N.

Dear Mr. O'brien:

While processing your Freedom of Information/Privacy Acts (FOIPA) request, the Defense Counterintelligence and Security Agency (DCSA) located FBI information in their records. This material was referred to the FBI for direct response to you.

The enclosed documents were reviewed under the FOIPA, Title 5, United States Code, Section(s) 552/552a as noted below. Below you will find check boxes under the appropriate statute headings which indicate the types of exemptions asserted to protect information which is exempt from disclosure. The appropriate exemptions are noted on the enclosed pages next to redacted information. In addition, a deleted page information sheet was inserted to indicate where pages were withheld entirely and identify which exemptions were applied. The checked exemptions boxes used to withhold information are further explained in the enclosed Explanation of Exemptions.

<b>Section 552</b>		<b>Section 552a</b>
<input type="checkbox"/> (b)(1)	<input type="checkbox"/> (b)(7)(A)	<input type="checkbox"/> (d)(5)
<input type="checkbox"/> (b)(2)	<input type="checkbox"/> (b)(7)(B)	<input checked="" type="checkbox"/> (j)(2)
<input type="checkbox"/> (b)(3)	<input type="checkbox"/> (b)(7)(C)	<input type="checkbox"/> (k)(1)
_____	<input type="checkbox"/> (b)(7)(D)	<input type="checkbox"/> (k)(2)
_____	<input checked="" type="checkbox"/> (b)(7)(E)	<input type="checkbox"/> (k)(3)
_____	<input type="checkbox"/> (b)(7)(F)	<input type="checkbox"/> (k)(4)
<input type="checkbox"/> (b)(4)	<input type="checkbox"/> (b)(8)	<input type="checkbox"/> (k)(5)
<input type="checkbox"/> (b)(5)	<input type="checkbox"/> (b)(9)	<input type="checkbox"/> (k)(6)
<input type="checkbox"/> (b)(6)		<input type="checkbox"/> (k)(7)

2 pages were reviewed and 2 pages are being released.

The FBI withheld information compiled for law enforcement purposes per Privacy Act exemption (j)(2) and FOIA exemption (b)(7)(E), law enforcement techniques and procedures.

Please refer to the enclosed FBI FOIPA Addendum for additional standard responses applicable to your request. "Part 1" of the Addendum includes standard responses that apply to all requests. "Part 2" includes additional standard responses that apply to all requests for records about yourself or any third party individuals. "Part 3" includes general information about FBI records that you may find useful. Also enclosed is our Explanation of Exemptions.

For questions regarding our determinations, visit the [www.fbi.gov/foia](http://www.fbi.gov/foia) website under "Contact Us." The FOIPA Request number listed above has been assigned to your request. Please use this number in all correspondence concerning your request.

If you are not satisfied with the Federal Bureau of Investigation's determination in response to this request, you may administratively appeal by writing to the Director, Office of Information Policy (OIP), United States Department of Justice, 441 G Street, NW, 6th Floor, Washington, D.C. 20530, or you may submit an appeal through OIP's FOIA STAR portal by creating an account following the instructions on OIP's website: <https://www.justice.gov/oip/submit-and-track-request-or-appeal>. Your appeal must be postmarked or electronically transmitted within ninety (90) days of the date of my response to your request. If you submit your appeal by mail, both the letter and the envelope should be clearly marked "Freedom of Information Act Appeal." Please cite the FOIPA Request Number assigned to your request so it may be easily identified.

You may seek dispute resolution services by contacting the Office of Government Information Services (OGIS). 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, e-mail 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. Alternatively, you may contact the FBI's FOIA Public Liaison by emailing [foipaquestions@fbi.gov](mailto:foipaquestions@fbi.gov). If you submit your dispute resolution correspondence by email, the subject heading should clearly state "Dispute Resolution Services." Please also cite the FOIPA Request Number assigned to your request so it may be easily identified.

Sincerely,



Michael G. Seidel  
Section Chief,  
Record/Information  
Dissemination Section  
Information Management Division

Enclosures

### FBI FOIPA Addendum

As referenced in our letter responding to your Freedom of Information/Privacy Acts (FOIPA) request, the FBI FOIPA Addendum provides information applicable to your request. Part 1 of the Addendum includes standard responses that apply to all requests. Part 2 includes standard responses that apply to requests for records about individuals to the extent your request seeks the listed information. Part 3 includes general information about FBI records, searches, and programs.

#### Part 1: The standard responses below apply to all requests:

- (i) **5 U.S.C. § 552(c).** Congress excluded three categories of law enforcement and national security records from the requirements of the FOIPA [5 U.S.C. § 552(c)]. FBI responses are limited to those records subject to the requirements of the FOIPA. Additional information about the FBI and the FOIPA can be found on the [www.fbi.gov/foia](http://www.fbi.gov/foia) website.
- (ii) **Intelligence Records.** To the extent your request seeks records of intelligence sources, methods, or activities, the FBI can neither confirm nor deny the existence of records pursuant to FOIA exemptions (b)(1), (b)(3), and as applicable to requests for records about individuals, PA exemption (j)(2) [5 U.S.C. §§ 552/552a (b)(1), (b)(3), and (j)(2)]. The mere acknowledgment of the existence or nonexistence of such records is itself a classified fact protected by FOIA exemption (b)(1) and/or would reveal intelligence sources, methods, or activities protected by exemption (b)(3) [50 USC § 3024(i)(1)]. This is a standard response and should not be read to indicate that any such records do or do not exist.

#### Part 2: The standard responses below apply to all requests for records on individuals:

- (i) **Requests for Records about any Individual—Watch Lists.** The FBI can neither confirm nor deny the existence of any individual's name on a watch list pursuant to FOIA exemption (b)(7)(E) and PA exemption (j)(2) [5 U.S.C. §§ 552/552a (b)(7)(E), (j)(2)]. This is a standard response and should not be read to indicate that watch list records do or do not exist.
- (ii) **Requests for Records about any Individual—Witness Security Program Records.** The FBI can neither confirm nor deny the existence of records which could identify any participant in the Witness Security Program pursuant to FOIA exemption (b)(3) and PA exemption (j)(2) [5 U.S.C. §§ 552/552a (b)(3), 18 U.S.C. 3521, and (j)(2)]. This is a standard response and should not be read to indicate that such records do or do not exist.
- (iii) **Requests for Records for Incarcerated Individuals.** The FBI can neither confirm nor deny the existence of records which could reasonably be expected to endanger the life or physical safety of any incarcerated individual pursuant to FOIA exemptions (b)(7)(E), (b)(7)(F), and PA exemption (j)(2) [5 U.S.C. §§ 552/552a (b)(7)(E), (b)(7)(F), and (j)(2)]. This is a standard response and should not be read to indicate that such records do or do not exist.

#### Part 3: General Information:

- (i) **Record Searches.** The Record/Information Dissemination Section (RIDS) searches for reasonably described records by searching systems or locations where responsive records would reasonably be found. A standard search normally consists of a search for main files in the Central Records System (CRS), an extensive system of records consisting of applicant, investigative, intelligence, personnel, administrative, and general files compiled by the FBI per its law enforcement, intelligence, and administrative functions. The CRS spans the entire FBI organization, comprising records of FBI Headquarters, FBI Field Offices, and FBI Legal Attaché Offices (Legats) worldwide; Electronic Surveillance (ELSUR) records are included in the CRS. Unless specifically requested, a standard search does not include references, administrative records of previous FOIPA requests, or civil litigation files. For additional information about our record searches, visit [www.fbi.gov/services/information-management/foipa/requesting-fbi-records](http://www.fbi.gov/services/information-management/foipa/requesting-fbi-records).
- (ii) **FBI Records.** Founded in 1908, the FBI carries out a dual law enforcement and national security mission. As part of this dual mission, the FBI creates and maintains records on various subjects; however, the FBI does not maintain records on every person, subject, or entity.
- (iii) **Requests for Criminal History Records or Rap Sheets.** The Criminal Justice Information Services (CJIS) Division provides Identity History Summary Checks – often referred to as a criminal history record or rap sheet. These criminal history records are not the same as material in an investigative "FBI file." An Identity History Summary Check is a listing of information taken from fingerprint cards and documents submitted to the FBI in connection with arrests, federal employment, naturalization, or military service. For a fee, individuals can request a copy of their Identity History Summary Check. Forms and directions can be accessed at [www.fbi.gov/about-us/cjis/identity-history-summary-checks](http://www.fbi.gov/about-us/cjis/identity-history-summary-checks). Additionally, requests can be submitted electronically at [www.edo.cjis.gov](http://www.edo.cjis.gov). For additional information, please contact CJIS directly at (304) 625-5590.
- (iv) **National Name Check Program (NNCP).** The mission of NNCP is to analyze and report information in response to name check requests received from federal agencies, for the purpose of protecting the United States from foreign and domestic threats to national security. Please be advised that this is a service provided to other federal agencies. Private Citizens cannot request a name check.

## EXPLANATION OF 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 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 reasonably be 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 5, 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.



**FEDERAL BUREAU OF INVESTIGATION**  
**Records Management Division**  
**National Name Check Program**



**(U//FOUO) DISCLAIMER INFORMATION**

(U//FOUO) This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency. It and its contents are not to be distributed outside your agency.

(U//FOUO) This reply is a result of a check of the FBI investigative files only. To check criminal history records, a request must be submitted to the FBI Criminal Justice Information Services Division. Fingerprints are necessary for a positive check.

(U//FOUO) Information provided in response to name check requests is derived from various FBI data sources to include internal databases and paper records. The FBI may not be able to produce all records in paper format due to their inherently electronic nature found and maintained within FBI databases.

(U//FOUO) Information provided to your agency may include information from a previous investigation conducted by the FBI. The FBI has not attempted to update such records. Accordingly, it is recommended that your agency take appropriate action to ensure that it maintains all records used in making any determination about any individual with such accuracy, relevance, timeliness, and completeness as is reasonably necessary to assure fairness to the individual in the determination.

(U//FOUO) Agency: U.S. OPM - Fed. Investigative Services (U//FOUO) Request Date: 4/20/2019 1:00 AM  
 (U//FOUO) Submission ID: OPM1-190420-010038BA (U//FOUO) Response Package Created Date: 7/22/2019 1:25 PM

**(U//FOUO) SUBJECT INFORMATION (Customer Agency Provided)**

(U//FOUO) Name: HALEEM, DEEN NIMER (U//FOUO) CIDN: J120623247 (U//FOUO) CIDN Ext: 0  
 (U//FOUO) POB: KUWAIT (U//FOUO) Sex: Male (U//FOUO) Race: Unknown  
 (U//FOUO) Aliases: [REDACTED] (U//FOUO) SOCs: 328606725 (U//FOUO) DOBs: 19640924

(U//FOUO) Miscellaneous: N/A

**(U//FOUO) Employers:**

Name	City	State	Country	From Year	To Year
TIQA LLC	PORTLAND	ME	NOT ON TABLE	2014	2019

**(U//FOUO) Residences:**

Street Number	Street Name	City	State	Country	From Year	To Year
172	EASTERN PROMENADE	PORTLAND	ME	NOT ON TABLE	2014	2019
6	WHALER LANE	QUINCY	MA	NOT ON TABLE	2012	2014
10	CARRIAGE LANE	SHIRLEY	MA	NOT ON TABLE	2011	2012



Federal Bureau of Investigation  
Records Management Division  
National Name Check Program

C120440232



*Official Name Check Response*



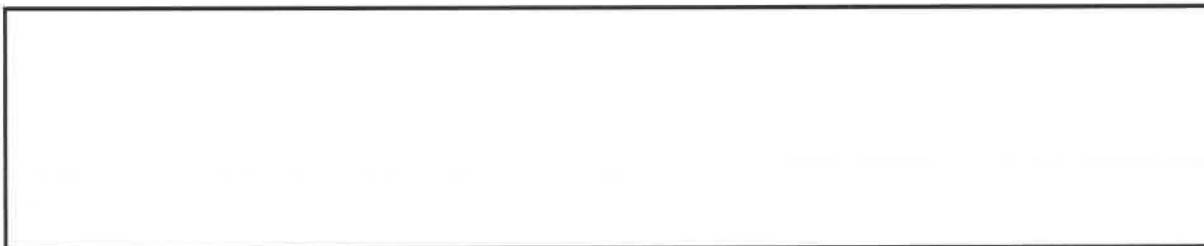
j2  
b7E

Response to an Automated Indices Record Check  
Does Not Include a Fingerprint Check

AGENCY: OPM1  
TAPE: XXXXXX  
RUNDATE: 02/29/2012  
PRINTDATE:  
-CIDN: C120440232  
NAME: HALEEM, DEEN NIMER  
POB: KUW  
SEX:  
RACE:  
DOB: [REDACTED]  
SOC: [REDACTED]  
AKA: ABDELALHALEEM, SAADELDEEN NIMER  
NIMER, ABDELAHALEEM SAADELDEEN

EMPLOYMENT: From: 2010 To: 2012  
DST RETIREMENT SOLUTIONS  
QUINCY MA

74 DOUGLAS DRIVE  
COVINGTON TOWNSHIP, PA  
1037 SOUTHERN ARTERY  
QUINCY, MA  
10 CARRIAGE LANE  
SHIRLEY, MA



j2  
b7E

This reply is a result of a check of the FBI Headquarters investigative files only. To check arrest records, request must be submitted to FBI Criminal Justice Information Services Division. Fingerprints are necessary for a positive check.

# EXHIBIT O



U.S. Department of Justice

Federal Bureau of Investigation  
Washington, D.C. 20535

April 25, 2022

MR. BRETT JOHN O'BRIEN  
NATIONAL SECURITY LAW FIRM  
SUITE 700  
1250 CONNECTICUT AVENUE NORTHWEST  
WASHINGTON, DC 20036

FOIPA Request No.: 1540081-000  
Subject: HALEEM, DEEN NIMER

Dear Mr. O'Brien:

This acknowledges receipt of your Freedom of Information/Privacy Acts (FOIPA) request to the FBI. Below you will find check boxes and informational paragraphs about your request, as well as specific determinations required by these statutes. Please read each one carefully.

- Your request has been received at FBI Headquarters for processing.
- You submitted your request via the FBI's eFOIPA system.
- We have reviewed your request and determined it is consistent with the FBI eFOIPA terms of service. Future correspondence about your FOIPA request will be provided in an email link unless the record's file type is not supported by the eFOIPA system.
- We have reviewed your request and determined it is not consistent with the FBI eFOIPA terms of service. Future correspondence about your FOIPA request will be sent through standard mail.
- The subject of your request is currently being processed and documents will be released to you upon completion.
- Release of responsive records will be posted to the FBI's electronic FOIA Library (The Vault), <http://vault.fbi.gov>, and you will be contacted when the release is posted.
- Your request for a public interest fee waiver is under consideration and you will be advised of the decision if fees are applicable. If your fee waiver is not granted, you will be responsible for applicable fees per your designated requester fee category below.
- For the purpose of assessing any fees, we have determined:
  - As a commercial use requester, you will be charged applicable search, review, and duplication fees in accordance with 5 USC § 552 (a)(4)(A)(ii)(I).
  - As an educational institution, noncommercial scientific institution or representative of the news media requester, you will be charged applicable duplication fees in accordance with 5 USC § 552 (a)(4)(A)(ii)(II).
  - As a general (all others) requester, you will be charged applicable search and duplication fees in accordance with 5 USC § 552 (a)(4)(A)(ii)(III).

Please check the status of your FOIPA request at [www.fbi.gov/foia](http://www.fbi.gov/foia) by clicking on **FOIPA Status** and entering your FOIPA Request Number. Status updates are adjusted weekly. The status of newly assigned requests may not be available until the next weekly update. If the FOIPA has been closed the notice will indicate that appropriate correspondence has been mailed to the address on file.

For questions regarding our determinations, visit the [www.fbi.gov/foia](http://www.fbi.gov/foia) website under "Contact Us." The FOIPA Request number listed above has been assigned to your request. Please use this number in all correspondence concerning your request.

If you are not satisfied with the Federal Bureau of Investigation's determination in response to this request, you may administratively appeal by writing to the Director, Office of Information Policy (OIP), United States Department of Justice, 441 G Street, NW, 6th Floor, Washington, D.C. 20530, or you may submit an appeal through OIP's FOIA STAR portal by creating an account following the instructions on OIP's website: <https://www.justice.gov/oip/submit-and-track-request-or-appeal>. Your appeal must be postmarked or electronically transmitted within ninety (90) days of the date of my response to your request. If you submit your appeal by mail, both the letter and the envelope should be clearly marked "Freedom of Information Act Appeal." Please cite the FOIPA Request Number assigned to your request so it may be easily identified.

You may seek dispute resolution services by contacting the Office of Government Information Services (OGIS). 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, e-mail 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. Alternatively, you may contact the FBI's FOIA Public Liaison by emailing [foipaquestions@fbi.gov](mailto:foipaquestions@fbi.gov). If you submit your dispute resolution correspondence by email, the subject heading should clearly state "Dispute Resolution Services." Please also cite the FOIPA Request Number assigned to your request so it may be easily identified.

Sincerely,



Michael G. Seidel  
Section Chief  
Record/Information  
Dissemination Section  
Information Management Division

# EXHIBIT P

U.S. Department of Justice



**Federal Bureau of Investigation**  
 Washington, D.C. 20535

August 3, 2022

MR. BRETT JOHN O'BRIEN  
 NATIONAL SECURITY LAW FIRM  
 SUITE 700  
 1250 CONNECTICUT AVENUE NORTHWEST  
 WASHINGTON, DC 20036

Request No.: 1540081-000  
 Subject: HALEEM, DEEN NIMER

Dear Mr. O'brien:

This is in response to your Freedom of Information/Privacy Acts (FOIPA) request. Based on the information you provided, we conducted a main entity record search of the Central Records System (CRS) per our standard search policy. However, we were unable to identify records subject to the FOIPA that are responsive to your request. Therefore, your request is being closed. If you have additional information pertaining to the subject of your request, please submit a new request providing the details, and we will conduct an additional search. For more information about records searches and the standard search policy, see the enclosed FBI FOIPA Addendum General Information Section.

Please see the paragraphs below for relevant information that may be specific to your request. Only checked boxes contain corresponding paragraphs relevant to your request. If no boxes are checked, the corresponding information does not apply.

- Please be advised that your request was reopened based on the additional information you provided. A new search was conducted, and we were unable to identify records subject to the FOIPA that are responsive to your request.
- Records potentially responsive to your request were destroyed. Since this material could not be reviewed, it is not known if it was responsive to your request. Record retention and disposal is carried out under supervision of the National Archives and Records Administration (NARA) according to Title 44 United States Code Section 3301, Title 36 Code of Federal Regulations (CFR) Chapter 12 Sub-chapter B Part 1228, and 36 CFR 1229.10. Please be advised that the General Records Schedule (GRS) disposition authority for FOIPA records is DAA-GRS-2016-0002-0001 (GRS 4.2, Item 020).
- Records potentially responsive to your request were transferred to the National Archives and Records Administration (NARA). If you wish to review these records, file a FOIPA request with NARA at the following address:  

National Archives and Records Administration  
 Special Access and FOIA  
 8601 Adelphi Road, Room 5500  
 College Park, MD 20740-6001
- Potentially responsive records were identified during the search. However, we were advised that they were not in their expected locations. An additional search for the missing records also met with unsuccessful results. Since we were unable to review the records, we were unable to determine if they were responsive to your request.
- The identification records requested are maintained by the FBI's Criminal Justice Information Services (CJIS) Division; therefore, we have forwarded a portion of your request to CJIS for processing. To check the status of this request, please contact CJIS directly at (304) 625-5590. For additional information, see the enclosed FBI FOIPA Addendum General Information Section.
- Requests for expedited processing are not applicable when a final response is issued within ten calendar days.

- ┌ Police departments should be aware that the search conducted was limited to FBI records. Requests for criminal history records or rap sheets should be directed to Criminal Justice Information Services (CJIS). Information regarding CJIS is listed in the enclosed FBI FOIPA Addendum General Information Section.
- ┌ Records potentially responsive to your request were transferred to the National Personnel Records Center - Civilian Personnel Records (NPRC-CPR). In order to obtain information on a file located at the NPRC, your request must be mailed to the following address:

National Archives and Records Administration  
ATTN: Archival Programs  
P.O. Box 38757  
St. Louis, MO 63138

Please refer to the enclosed FBI FOIPA Addendum for additional standard responses applicable to your request. "Part 1" of the Addendum includes standard responses that apply to all requests. "Part 2" includes additional standard responses that apply to all requests for records about yourself or any third party individuals. "Part 3" includes general information about FBI records that you may find useful. Also enclosed is our Explanation of Exemptions.

For questions regarding our determinations, visit the [www.fbi.gov/foia](http://www.fbi.gov/foia) website under "Contact Us." The FOIPA Request Number listed above has been assigned to your request. Please use this number in all correspondence concerning your request.

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Sincerely,



Michael G. Seidel  
Section Chief  
Record/Information  
Dissemination Section  
Information Management Division

Enclosures

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**Part 1: The standard responses below apply to all requests:**

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- (ii) **Intelligence Records.** To the extent your request seeks records of intelligence sources, methods, or activities, the FBI can neither confirm nor deny the existence of records pursuant to FOIA exemptions (b)(1), (b)(3), and as applicable to requests for records about individuals, PA exemption (j)(2) [5 U.S.C. §§ 552/552a (b)(1), (b)(3), and (j)(2)]. The mere acknowledgment of the existence or nonexistence of such records is itself a classified fact protected by FOIA exemption (b)(1) and/or would reveal intelligence sources, methods, or activities protected by exemption (b)(3) [50 USC § 3024(i)(1)]. This is a standard response and should not be read to indicate that any such records do or do not exist.

**Part 2: The standard responses below apply to all requests for records on individuals:**

- (i) **Requests for Records about any Individual—Watch Lists.** The FBI can neither confirm nor deny the existence of any individual's name on a watch list pursuant to FOIA exemption (b)(7)(E) and PA exemption (j)(2) [5 U.S.C. §§ 552/552a (b)(7)(E), (j)(2)]. This is a standard response and should not be read to indicate that watch list records do or do not exist.
- (ii) **Requests for Records about any Individual—Witness Security Program Records.** The FBI can neither confirm nor deny the existence of records which could identify any participant in the Witness Security Program pursuant to FOIA exemption (b)(3) and PA exemption (j)(2) [5 U.S.C. §§ 552/552a (b)(3), 18 U.S.C. 3521, and (j)(2)]. This is a standard response and should not be read to indicate that such records do or do not exist.
- (iii) **Requests for Confidential Informant Records.** The FBI can neither confirm nor deny the existence of confidential informant records pursuant to FOIA exemptions (b)(7)(D), (b)(7)(E), and (b)(7)(F) [5 U.S.C. §§ 552 (b)(7)(D), (b)(7)(E), and (b)(7)(F)] and Privacy Act exemption (j)(2) [5 U.S.C. § 552a (j)(2)]. The mere acknowledgment of the existence or nonexistence of such records would reveal confidential informant identities and information, expose law enforcement techniques, and endanger the life or physical safety of individuals. This is a standard response and should not be read to indicate that such records do or do not exist.

**Part 3: General Information:**

- (i) **Record Searches and Standard Search Policy.** The Record/Information Dissemination Section (RIDS) searches for reasonably described records by searching systems, such as the Central Records System (CRS), or locations where responsive records would reasonably be found. The CRS is an extensive system of records consisting of applicant, investigative, intelligence, personnel, administrative, and general files compiled by the FBI per its law enforcement, intelligence, and administrative functions. The CRS spans the entire FBI organization, comprising records of FBI Headquarters, FBI Field Offices, and FBI Legal Attaché Offices (Legats) worldwide; Electronic Surveillance (ELSUR) records are included in the CRS. The standard search policy is a search for main entity records in the CRS. Unless specifically requested, a standard search does not include a search for reference entity records, administrative records of previous FOIPA requests, or civil litigation files.
  - a. *Main Entity Records* – created for individuals or non-individuals who are the subjects or the focus of an investigation
  - b. *Reference Entity Records*- created for individuals or non-individuals who are associated with a case but are not known subjects or the focus of an investigation
- (ii) **FBI Records.** Founded in 1908, the FBI carries out a dual law enforcement and national security mission. As part of this dual mission, the FBI creates and maintains records on various subjects; however, the FBI does not maintain records on every person, subject, or entity.
- (iii) **Foreseeable Harm Standard.** As amended in 2016, the Freedom of Information Act provides that a federal agency may withhold responsive records only if: (1) the agency reasonably foresees that disclosure would harm an interest protected by one of the nine exemptions that FOIA enumerates, or (2) disclosure is prohibited by law (5 United States Code, Section 552(a)(8)(A)(i)). The FBI considers this foreseeable harm standard in the processing of its requests.
- (iv) **Requests for Criminal History Records or Rap Sheets.** The Criminal Justice Information Services (CJIS) Division provides Identity History Summary Checks – often referred to as a criminal history record or rap sheet. These criminal history records are not the same as material in an investigative “FBI file.” An Identity History Summary Check is a listing of information taken from fingerprint cards and documents submitted to the FBI in connection with arrests, federal employment, naturalization, or military service. For a fee, individuals can request a copy of their Identity History Summary Check. Forms and directions can be accessed at [www.fbi.gov/about-us/cjis/identity-history-summary-checks](http://www.fbi.gov/about-us/cjis/identity-history-summary-checks). Additionally, requests can be submitted electronically at [www.edo.cjis.gov](http://www.edo.cjis.gov). For additional information, please contact CJIS directly at (304) 625-5590.



**EXPLANATION OF 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 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 reasonably be 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 5, 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.

# EXHIBIT Q



U.S. Department of Justice

Federal Bureau of Investigation  
Washington, D.C. 20535

August 3, 2022

MR. BRETT JOHN O'BRIEN  
NATIONAL SECURITY LAW FIRM  
SUITE 700  
1250 CONNECTICUT AVENUE NORTHWEST  
WASHINGTON, DC 20036

FOIPA Request No.: 1540081-000  
Subject: HALEEM, DEEN NIMER

Dear Mr. O'brien:

This is in reference to your letter to the FBI, in which you requested expedited processing for the above-referenced Freedom of Information/Privacy Acts (FOIPA) request. Under Department of Justice (DOJ) standards for expedited processing, it can only be granted in the following situations:

**28 C.F.R. §16.5 (e)(1)(i):** "Circumstances in which the lack of expedited treatment could reasonably be expected to pose an imminent threat to the life or physical safety of an individual."

**28 C.F.R. §16.5 (e)(1)(ii):** "An urgency to inform the public about an actual or alleged federal government activity, if made by a person primarily engaged in disseminating information."

**28 C.F.R. §16.5 (e)(1)(iii):** "The loss of substantial due process of rights."

**28 C.F.R. §16.5 (e)(1)(iv):** "A matter of widespread and exceptional media interest in which there exists possible questions about the government's integrity which affects public confidence."

You have not provided enough information concerning the statutory requirements permitting expedition; therefore, your request is denied.

For questions regarding our determinations, visit the [www.fbi.gov/foia](http://www.fbi.gov/foia) website under "Contact Us." The FOIPA Request number listed above has been assigned to your request. Please use this number in all correspondence concerning your request.

If you are not satisfied with the Federal Bureau of Investigation's determination in response to this request, you may administratively appeal by writing to the Director, Office of Information Policy (OIP), United States Department of Justice, 441 G Street, NW, 6th Floor, Washington, D.C. 20530, or you may submit an appeal through OIP's FOIA STAR portal by creating an account following the instructions on OIP's website: <https://www.justice.gov/oip/submit-and-track-request-or-appeal>. Your appeal must be postmarked or electronically transmitted within ninety (90) days of the date of my response to your request. If you submit your appeal by mail, both the letter and the envelope should be clearly marked "Freedom of Information Act Appeal." Please cite the FOIPA Request Number assigned to your request so it may be easily identified.

You may seek dispute resolution services by emailing the FBI's FOIA Public Liaison at [foipaquestions@fbi.gov](mailto:foipaquestions@fbi.gov). The subject heading should clearly state "Dispute Resolution Services." Please also cite the FOIPA Request Number assigned to your request so it may be easily identified. You may also contact the Office of Government Information Services (OGIS). 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, e-mail 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,

A handwritten signature in black ink, appearing to read "M. G. Seidel".

Michael G. Seidel  
Section Chief  
Record/Information  
Dissemination Section  
Information Management Division