

EXHIBIT A



CONSTITUTIONAL LAW CENTER
for MUSLIMS in AMERICA

Transportation Security Administration (TSA)
TSA-20, East Tower
Freedom of Information Act (FOIA) Branch
601 S. 12th Street
Arlington, VA 20598-6020

Kerry Callahan
FOIA Officer/Public Liaison
Sent Via eFax: (571) 227-1406; (850) 245-5502
Sent Via Email: foia@tsa.dhs.gov

February 13, 2020

RE: FOIA/PA REQUEST OF LASSANA MAGASSA

Dear Kerry Callahan, FOIA Officer/Public Liaison:

We hereby make this written request under the Freedom of Information Act, 5 U.S.C. § 522, and the Privacy Act, 5 U.S.C. § 522a. This request is made on behalf of my client, Mr. Lassana Magassa.

Mr. Magassa hereby requests disclosure of any records that were prepared, received, transmitted, collected and/or maintained by the TSA from 2015 to present day, including but not limited to:

- Records relating to TSA Inspector reports or notes concerning Lassana Magassa at SeaTac International Airport, from September 2019 to present day; and
- Records relating to aviation-worker credentials and/or Security Identification Display Area (commonly referred to as “SIDA”) badges Mr. Magassa obtained, and/or any revocation of the same, through all employment positions he has held at SeaTac International Airport, from January 2015 to present day.

In keeping with the spirit of FOIA, with its “strong presumption in favor of disclosure,”¹ if this request is denied in whole or in part, please provide sufficient justification for all withholdings by reference to specific exemptions of FOIA along with explanations as to the exemption’s applicability to this case.² Please provide all segregable portions of otherwise exempt material. We will promptly appeal any decision to unreasonably withhold any information.

¹ *ACLU v. U.S. DOJ*, 655 F.3d 1, 6 (D.C. Cir. 2011) (quoting *Nat’l Ass’n of Home Builders v. Norton*, 309 F.3d 26, 32 (D.C. Cir. 2002)).

² The responding agency “bears the burden of proving the applicability of claimed exemptions.” *Nat’l Sec. Counselors v. CIA*, 960 F. Supp. 2d 101, 132 (D.C. Cir. 2013) (quoting *Am. Civil Liberties Union v. U.S. Dep’t of Def. (“ACLU/DOD”)*, 628 F.3d 612, 619 (D.C. Cir. 2011)).

Please send all records, as they become available, to the undersigned at this address:

Constitutional Law Center for Muslims in America (CLCMA)
833 E. Arapaho Rd
Suite 102
Richardson, TX 75081

Thank you for your assistance.

Sincerely,

/s/ Christina A. Jump

Christina A. Jump
Civil Litigation Department Head
Constitutional Law Center for Muslims in America
833 E. Arapaho Rd., Suite 102
Richardson, TX 75081
Phone: (972) 914-2507
Fax: (972) 692-7454
cjump@clcma.org

Enclosures: DHS 590 form
Certification of Identity

cc: Lassana Magassa