



CONSTITUTIONAL LAW CENTER  
*for MUSLIMS in AMERICA*

June 28, 2022

Charles H. Kable  
Director, Terrorist Screening Center  
601 4th St. NW  
Washington, DC 20535

Dear Mr. Kable:

We submit this request on behalf of our client Ayman Fareh Soliman, under the Freedom of Information Act, 5 U.S.C. § 552a.

Enclosed, please find Mr. Soliman's signed Certification of Identity form DOJ-361, authorizing the release of his personal information to the undersigned. To aid in identifying Mr. Soliman, please also note his date of birth of 01/07/1974.

We request disclosure of the following records created or maintained by the Terrorist Screening Center ("TSC") relating to Ayman Fareh Soliman, from January 1, 2010 until the day this request is processed:

- The entirety of any file about Mr. Soliman maintained in the Terrorist Screening Dataset ("TSDS") and its predecessor, the Terrorist Screening Database ("TSDB"), including the record history and any archived TSDS/TSDB records;
- Records of communications between the TSC and Egyptian partners regarding Mr. Soliman;
- Records of remote queries of the TSDS/TSDB regarding Mr. Soliman;
- Records regarding Mr. Soliman maintained in the Encounter Management Application ("EMA"), including but not limited to records created or received on the following dates:
  - 06/25/2019; 07/03/2019; 10/04/2019; 10/18/2019; 10/22/2019; 11/18/2019; 12/02/2019; 12/17/2019; 02/08/2021;
- Records of queries by TSC to Fusion Centers regarding Mr. Soliman and the resulting information received;
- Records of requests to remove Mr. Soliman from the TSDS/TSDB received by or maintained by TSC.

If you find any portion of this request unclear, we welcome the opportunity to clarify. We also welcome the opportunity to discuss a schedule for producing responsive documents if needed.

Please provide all records electronically in their original file format. We further request the Agency provide records in text-searchable PDF format.

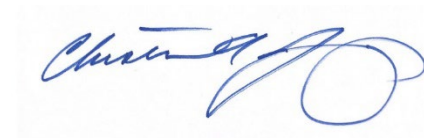
Please provide all segregable portions of any withheld material. We reserve the right to appeal any decision to withhold any information.

Please send all records, as they become available, to the undersigned at [cjump@clcma.org](mailto:cjump@clcma.org). If records are unavailable in electronic format, please send them care of Ms. Christina Jump at the following address:

Constitutional Law Center for Muslims in America  
100 N. Central Expressway  
Suite 1010  
Richardson, TX 75080

We look forward to a timely response, consistent with the Agency's obligations under FOIA. Thank you for your assistance.<sup>1</sup>

Sincerely,



Christina Jump  
Civil Litigation Department Head  
[cjump@clcma.org](mailto:cjump@clcma.org)

Samira Elhosary  
Civil Litigation Legal Fellow  
[selhosary@clcma.org](mailto:selhosary@clcma.org)

Enclosure: Form DOJ-361 signed by Ayman Soliman

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<sup>1</sup> See 5 U.S.C. § 552(f)(1) (defining agency as “any executive department, military department, Government corporation, Government controlled corporation, or other establishment in the executive branch of the Government (including the Executive Office of the President), or any independent regulatory agency...”); compare U.S. Dep’t of Justice, *Fact Sheet: The Terrorist Screening Center*, [https://www.justice.gov/archive/opa/pr/2003/September/03\\_ag\\_505factsheet.htm](https://www.justice.gov/archive/opa/pr/2003/September/03_ag_505factsheet.htm) (last visited June 01, 2022) (describing that “the FBI will administer the TSC” and “[t]he Department of Homeland Security, the Department of State, and others will coordinate with” the TSC, each of which qualifies as an “agency” under the definition provided in the FOIA).