# **EXHIBIT B**



LITIGATION | TRIALS | APPEALS 9801 Bissonnet Ave., Suite K, Houston, TX 77036 Telephone: (713) 929-9252 Email: Info@arameshlaw.com

January 8, 2024

Via Certified Mail

Freedom of Information Act Request U. S. Department of State Office of Information Programs and Services 2201 C Street N.W., Suite B266 Washington, D.C. 20520

Alaina B. Teplitz
Assistant Secretary of Administration
Bureau of Administration
U.S. Department of State
20121 C Street N.W.
Washington, D.C., 20522

Richard C. Visek Acting Legal Advisor Office of the Legal Advisor U.S. Department of State Suite 5.600 600 19th Street N.W. Washington, DC 20522

## Re: REACH MEDIA LLC'S FREEDOM OF INFORMATION ACT REQUEST

To Whom It May Concern at the Office of Information Programs and Services:

This letter serves as a notice of our **intent to file a lawsuit against you** if we do not receive a satisfactory response by January 22, 2024.



LITIGATION | TRIALS | APPEALS 9801 Bissonnet Ave., Suite K, Houston, TX 77036 Telephone: (713) 929-9252 Email: Info@arameshlaw.com

On November 9, 2023, this office sent to you via certified mail the enclosed Freedom of Information Act request ("FOIA Request") but did not receive a response.

You may contact me at <u>aramesh@arameshlaw.com</u> or at (818) 421-9895 if you would like to discuss this matter further before January 22, 2024.

Sincerely, Arash "Ari" Aramesh, Esq. 9801 Bissonnet Ave., Suite K Houston, TX 77036 Telephone: (713) 929-9252 aramesh@arameshlaw.com

Attorney's Signature

CC: Randell C. Ogg

The Law Offices of Randell C. Ogg 1101 Connecticut Avenue, NW Suite 410

Washington, D.C. 20036 Telephone: (202) 530-3170

Fax: (202) 355-6495

E-mail: <u>rogg@ogg-law.com</u>



November 9, 2023

Freedom of Information Act Request U. S. Department of State Office of Information Programs and Services 2201 C Street N.W., Suite B266 Washington, D.C. 20520-0000

## REACH MEDIA LLC'S FREEDOM OF INFORMATION ACT REQUEST

To Whom It May Concern at the Office of Information Programs and Services:

This is a request under the Freedom of Information Act (5 U.S.C. § 552).

# **Summary of Events (The "Incident")**

On September 20, 2023, members of the Islamic Republic of Iran's delegation departed the Millennium Hilton New York Hotel located at One UN Plaza, New York, NY 10017. Between 9:15 p.m., and 10:30 p.m., during which time, a member of the Iranian delegation commenced an altercation with Mr. Kian Amani, an Iran International journalist (Iran International is a subsidiary of Reach Media LLC). The member of the Iranian delegation in question made bodily contact with Mr. Amani and attempted to forcibly take away Mr. Amani's phone.

## **Document Request**

I request that a copy of the following document(s) be provided to me:

- 1. Any and all reports or documents about the Incident (regardless of who created the report or document).
- 2. Any and all statements made to the Department of State or obtained by the Department of State about the Incident.
- 3. Any and all photos, videos, audios, electronic files and recordings which pertain in any way to the Incident.

In order to help you determine my status for the purpose of assessing fees, you should know that I am the attorney of record for Reach Media LLC, located at 1101 New York Ave., Floor 8, Washington, DC 20005.

\_X\_ a representative of the news media affiliated with REACH MEDIA LLC, and this request is made as part of news gathering and not for a commercial use.



affiliated with an educational or noncommercial scientific institution and this request is made for a scholarly or scientific purpose and not for a commercial use.
affiliated with a private business and am seeking information for use in the company's business.
an individual seeking information for personal use and not for a commercial use.
I am willing to pay fees for this request up to a maximum of \$1,000.00. If you estimate that the fees will exceed this limit, please inform me first.
I also include a telephone number at which I can be contacted if necessary to discuss any aspect of my request.
Sincerely, Arash "Ari" Aramesh, Esq. 9801 Bissonnet Ave., Suite K Houston, TX 77036 (818)421-9895 aramesh@arameshlaw.com
Attorney's Signature