

## **INDEX OF EXHIBITS**

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**EXHIBIT 1**

On Wednesday, May 31, 2017, 6:27 AM, Bill conley <billc\_swd@yahoo.com> wrote:

Your email leads me to believe that you haven't even started looking into my FOIA request. Please call Karen Sheppard @ [303-342-6512](tel:303-342-6512). She is the TSA Quality assurance manager at Denver international and has the details you need. She also works for TSA which amazes me that you don't have her number nor did you ask her for this information.

Please make sure you notify Mrs Sheppard that my FOIA request to you was made before I talked with her and that I am not dismissing or waiving the complaint I made through her nor am I asking her to discontinue her investigation.

- bill

Sent from Yahoo Mail for iPhone

On Wednesday, May 31, 2017, 8:12 AM, Dennis, Deborah <Deborah.Dennis1@tsa.dhs.gov> wrote:

Good Morning,

To search for records responsive to your request the airport needs additional information. Please provide as much detail as possible regarding the checkpoint location as there are 3 TSA checkpoints at the airport (North, South, and A-bridge), and each checkpoint has numerous screening lanes and cameras.

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**From:** Bill conley [mailto:billc\_swd@yahoo.com]

**Sent:** Thursday, May 4, 2017 9:47 PM

**To:** FOIA <FOIA@tsa.dhs.gov>

**Subject:** 7. FOIA Request

I'm officially making a FIOA request for an incident that occurred on April 26, 2017 between the hours of 1945 hours and 2020 hours involving three TSA bag screeners. The incident occurred at the Denver International Airport. The only information I have is the date, time and that I was at the Denver International Airport. The only name I have is TSA Employee "Wood". The Denver PD was also involved.

Full Name: William Conley

Address: None Given all communications can be delivered via email

Phone: None Given all communications can be delivered via email

Email: [billc\\_swd@yahoo.com](mailto:billc_swd@yahoo.com)

Fees: I do not wish to pay any fees.

Type of request: FOIA but I reserve the right to file for a Privacy Act request at a later date.

Specific information:

- Any and all video and/or photographs and/or audio recording involving or related to the incident. This includes video take at the Body Scanner where the abuse started.
- Any email and/or written documents generated by any TSA employees involving or related to the incident. This includes electronic communications and manually written or generated documents.
- Any and all communications between TSA employees and any other agency.
- Names and Official Badge numbers of all TSA employees involved.

This is the original narrative to help you determine the TSA bag screener involved and the location within the Denver Airport where the incident occurred : On April 26 2017 at approx. 2020 hours I was passing through the TSA security check point to board a flight at the Denver International Airport. While exiting through the body scanner I was ordered by one of the TSA bag-screener's to stop and extend my arms out like an airplane. I complied with the order when another TSA bag-screener began laughing. When I asked why he was laughing the TSA bag-screener told me that the TSA bag-screener that stopped me was forcing people to lift their arms "to lighten things up". He went on to say that the commands were not necessary. I asked to speak to a TSA supervisor where I was directed to TSA bag-screener "WOOD" as indicated on his uniform shirt. WOOD told me that he was a supervisor.

I asked TSA bag-screener WOOD if he was the supervisor and he said yes. I began to explain what happened with the two TSA bag-screener's at the body-scanner and asked for him to take my complaint where he refused to. I then asked for TSA bag-screener WOOD's supervisor where he refused to tell me and pointed to a Denver Police officer. WOOD repeated pointing to the Police officer and verbally telling me "that is my supervisor". He not only confused me but WOOD also confused two other TSA bag-screener's who pointed in the opposite direction towards a TSA desk.

I repeated my request to TSA bag-screener WOOD and he refused to take my complaint or to contact his supervisor. It was at this time where TSA bag-screener WOOD demanded my ID and boarding pass in a clear attempt to intimidate me.

I had already cleared the TSA bag-screening checkpoint and was free to continue to my gate. TSA bag-screener WOOD told one of the police officers that I was trespassing; One of the officers demanded ID under threat of arrest knowing that I had already identified myself via a government issued ID and my boarding pass as part of the TSA screening process.

I was detained by two Denver police officers and one LT. I was told by the LT. that I was being detained "to check for warrants" and that I was not free to leave. It's clear that the LT had no reason to suspect that I had warrants and had no reasonable reason to detain me. The officer demanding ID and the LT knew prior to demanding ID and detaining me that I had already identified myself as part of the TSA process.

I am formerly filing a complaint against TSA bag-screener WOOD's for

demanding my identification, causing my detainment, refusing to take my complaint, refusing to gain a proper supervisor and for giving false information to a Denver Police officer. I was not trespassing, DIA is a public area and I had a lawful reason to be at the airport and was cleared by TSA to enter the restricted area in order to board my flight. I followed the process required by TSA. This was a clear case of being harassed and threatened by the TSA and Denver PD. If the police officers relied on TSA bag-screener WOOD's charges that I was trespassing in order to detain me then I am also formally asking the Denver Police department to take my criminal complaint against TSA bag-screener WOOD for giving false information to a police officer.

Respectfully,

William H. Conley III

Thank You, Bill Conley

**EXHIBIT 2**

On Friday, June 16, 2017, 9:35 AM, Sheppard, Karen <karen.sheppard@tsa.dhs.gov> wrote:

Mr. Conley – Once you receive the information from the FOIA office, you'll have an account of everyone's statement.

Have a good day - Karen

---

**From:** Bill conley [mailto:billc\_swd@yahoo.com]  
**Sent:** Friday, June 16, 2017 10:24 AM  
**To:** Sheppard, Karen <karen.sheppard@tsa.dhs.gov>  
**Subject:** Re: TSA Denver PD incident 04/26/2015

Thank you for the follow up.

We can agree to disagree on the events leading up to what happened. Mr. Wood is over embellishing.

Your outline does not cover why Mr Wood told the Denver Police officer I was trespassing which caused my detainment. I was not trespassing in fact was free to walk from the body scanner to my gate if it were not for the incident. I would like an answer to this.

Also missing is why the need of the two TSA's humiliating people and laughing in the process. I assume you have statements from these individuals. I would also like an answer to this.

Thank you.

[Sent from Yahoo Mail for iPhone](#)

On Friday, June 16, 2017, 9:13 AM, Sheppard, Karen  
<[karen.sheppard@tsa.dhs.gov](mailto:karen.sheppard@tsa.dhs.gov)> wrote:

Mr. Conley – Thank you for taking time out of your day to first meet with me at the Denver International Airport (DIA) and for the exchange of e-mails.

It was unfortunate that you had a less than pleasant experience at DIA. Officers on the checkpoint screen approximately 50,000 passengers a day. It's regrettable that your experience went sideways.

When I met with you on May 8<sup>th</sup>, on C-Concourse of the airport, your story was very compelling. Based upon your organized and passionate explanation of events, I began a thorough investigation into your complaint.

When I started reading witness statements and in particular, when I started reviewing video, I saw another side of the story on what occurred that day. When you receive the information from the FOIA Office, I respectfully request that you review the video clips and read all statements.

To briefly summarize, the incident started at approximately 8:08 p.m. and wrapped up at about 8:17 p.m. The total time you were actually in the screening process was approximately 5 seconds. You spent approximately 7 seconds speaking with the second Officer. From there, you approached Supervisor Rob Wood, and per both the video and from speaking Rob, you came at him with a high rate of speed, shaking your finger in his face. He wasn't sure what you needed. Mr. Wood's manager does not reside on



the checkpoint. He told me that he attempted to explain this to you. He said that he pointed to the Denver Police Officer, not because he was Rob's manager, but because you told him that you wanted to speak to someone else in command. Two Officers standing close-by confirmed this conversation.

I've spoken to both Supervisor Wood and briefed his manager about your screening experience. It was an unfortunate chain of occurrences, on the parts of both the TSA Employees involved and yourself.

I look forward to hearing from you if you have any questions after you are able to review the relevant statements and video clip.

I wish you well – Karen

Karen Sheppard  
Customer Support/Stakeholder – Team Colorado  
[Karen.Sheppard@tsa.dhs.gov](mailto:Karen.Sheppard@tsa.dhs.gov)  
Desk: [\(303\) 342-6512](tel:3033426512)

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**From:** Bill conley [[mailto:billc\\_sw@yaho.com](mailto:billc_sw@yaho.com)]  
**Sent:** Friday, June 9, 2017 9:12 AM  
**To:** Sheppard, Karen <[karen.sheppard@tsa.dhs.gov](mailto:karen.sheppard@tsa.dhs.gov)>  
**Subject:** Re: TSA Denver PD incident 04/26/2015

Thank you.

[Sent from Yahoo Mail for iPhone](#)

On Friday, June 9, 2017, 10:00 AM, Sheppard, Karen <[karen.sheppard@tsa.dhs.gov](mailto:karen.sheppard@tsa.dhs.gov)> wrote:

Bill – Good morning; I apologize for not getting back with you sooner, it's been a crazy last few weeks. Your file is on my desk and ready to be processed. You can expect to hear from me next week.

Until then, have a nice weekend – Karen

Karen Sheppard

Customer Support/Stakeholder – Team Colorado

[Karen.Sheppard@tsa.dhs.gov](mailto:Karen.Sheppard@tsa.dhs.gov)

Desk: [\(303\) 342-6512](tel:(303)342-6512)

Cell: [\(303\) 919-2787](tel:(303)919-2787)

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**From:** Bill conley [[mailto:billc\\_swid@yahoo.com](mailto:billc_swid@yahoo.com)]  
**Sent:** Friday, June 9, 2017 8:55 AM  
**To:** Sheppard, Karen <[karen.sheppard@tsa.dhs.gov](mailto:karen.sheppard@tsa.dhs.gov)>  
**Subject:** Re: TSA Denver PD incident 04/26/2015

Mrs. Sheppard,

I sent you an email last week - may I ask the disposition of your investigation?

[Sent from Yahoo Mail for iPhone](#)

On Tuesday, May 9, 2017, 4:07 PM, Sheppard, Karen <[karen.sheppard@tsa.dhs.gov](mailto:karen.sheppard@tsa.dhs.gov)> wrote:

Bill – Yes, I have a good view of you coming out of the scanner and speaking with the officer. We’ve also book marked several other cameras throughout the checkpoint. We’re good with camera views.

I’ll be back in touch soon. Thanks – Karen

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**From:** Bill conley [[mailto:billc\\_swd@yahoo.com](mailto:billc_swd@yahoo.com)]  
**Sent:** Tuesday, May 9, 2017 3:02 PM  
**To:** Sheppard, Karen <[karen.sheppard@tsa.dhs.gov](mailto:karen.sheppard@tsa.dhs.gov)>  
**Subject:** Re: TSA Denver PD incident 04/26/2015

Can you see the activity at the scanner that started all this?

[Sent from Yahoo Mail for iPhone](#)

On Tuesday, May 9, 2017, 4:00 PM, Sheppard, Karen <[karen.sheppard@tsa.dhs.gov](mailto:karen.sheppard@tsa.dhs.gov)> wrote:

Bill – Good Afternoon; yes, the video has been located and saved. I've reviewed the clip just one time. Once I finish collecting all statements of those involved, I'll go back and view it again. As there were several people involved, it may take a few days to receive all statements. Once I do, I'll get back to you.

Have a good day – Karen

Karen Sheppard

Customer Support/Stakeholder – Team  
Colorado

[Karen.Sheppard@tsa.dhs.gov](mailto:Karen.Sheppard@tsa.dhs.gov)

Desk: [\(303\) 342-6512](tel:(303)342-6512)

Cell: [\(303\) 919-2787](tel:(303)919-2787)

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**From:** Bill conley  
[[mailto:billc\\_swid@yahoo.com](mailto:billc_swid@yahoo.com)]  
**Sent:** Tuesday, May 9, 2017 2:52 PM  
**To:** Sheppard, Karen  
<[karen.sheppard@tsa.dhs.gov](mailto:karen.sheppard@tsa.dhs.gov)>  
**Subject:** Re: TSA Denver PD incident  
04/26/2015

Were you able to locate the video?

[Sent from Yahoo Mail for iPhone](#)

On Monday, May 8, 2017, 12:18 PM, Sheppard, Karen <[karen.sheppard@tsa.dhs.gov](mailto:karen.sheppard@tsa.dhs.gov)> wrote:

Bill – I appreciate your efforts on this case. Thank you for the write-up; it will assist me in locating you on CCTV.

I'll be in touch – Karen

Karen Sheppard

Customer Support/Stakeholder –  
Team Colorado

[Karen.Sheppard@tsa.dhs.gov](mailto:Karen.Sheppard@tsa.dhs.gov)

Desk: [\(303\) 342-6512](tel:(303)342-6512)

Cell: [\(303\) 919-2787](tel:(303)919-2787)

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**From:** Bill conley  
[[mailto:billc\\_swid@yahoo.com](mailto:billc_swid@yahoo.com)]  
**Sent:** Monday, May 8, 2017 10:36 AM  
**To:** [karen.sheppard@dhs.gov](mailto:karen.sheppard@dhs.gov)  
**Subject:** Fw: TSA Denver PD incident  
04/26/2015

Mrs Sheppard,

I first want to thank you and let you know that I appreciate your professionalism and your concern and dealing with the matter that occurred on April 26. Below is the narrative that I memorialized in writing within 15 minutes of the incident on April 26.

- W. Conley III

On April 26 2017 at approx. 2020 hours I was passing through the TSA security check point to board a flight. While exiting through the body scanner I was ordered by one of the TSA bag-screener to stop and extend my arms out like an airplane. I complied with the order when another

TSA bag-screener began laughing. When I asked why he was laughing the TSA bag-screener told me that the TSA bag-screener that stopped me was forcing people to lift their arms "to lighten things up". He went on to say that the commands were not necessary. I asked to speak to a TSA supervisor where I was directed to TSA bag-screener "WOOD" as indicated on his uniform shirt. WOOD told me that he was a supervisor.

I asked TSA bag-screener WOOD if he was the supervisor and he said yes. I began to explain what happened with the two TSA bag-screener's at the body-scanner and asked for him to take my complaint where he refused to. I then asked for TSA bag-screener WOOD's supervisor where he refused to tell me and pointed to a Denver Police officer. WOOD repeated pointing to the Police officer and verbally telling me "that is my supervisor". He not only confused me but WOOD also confused two other TSA bag-

screeners who pointed in the opposite direction towards a TSA desk.

I repeated my request to TSA bag-screener WOOD and he refused to take my complaint or to contact his supervisor. It was at this time where TSA bag-screener WOOD demanded my ID and boarding pass in a clear attempt to intimidate me.

I had already cleared the TSA bag-screening checkpoint and was free to continue to my gate. TSA bag-screener WOOD told one of the police officers that I was trespassing; One of the officers demanded ID under threat of arrest knowing that I had already identified myself via a government issued ID and my boarding pass as part of the TSA screening process.

I was detained by two Denver police officers and one LT. I was told by the LT. that I was being detained "to check for

warrants” and that I was not free to leave. It’s clear that the LT had no reason to suspect that I had warrants and had no reasonable reason to detain me. The officer demanding ID and the LT knew prior to demanding ID and detaining me that I had already identified myself as part of the TSA process.

I am formally filing a complaint against the officer demanding my identification and the LT who detained me. I was not trespassing. DIA is a public area and I had a lawful reason to be at the airport and was cleared by TSA to enter the restricted area in order to board my flight. I followed the process required by TSA. This was a clear case of being harassed and threatened by the TSA and Denver PD. If the police officers relied on TSA bag-screener WOOD’s charges that I was trespassing in order to detain me then I am also formally asking the Denver Police department to take my criminal complaint against TSA



bag-screener WOOD for giving false information to a police officer.

A video of the entire encounter was filmed for my protection.

Respectfully,

William H. Conley III

**EXHIBIT 3**

**MATTHEW A. GOLDSTEIN, PLLC**  
**INTERNATIONAL TRADE**  
1875 CONNECTICUT AVE NW, 10TH FL  
WASHINGTON, D.C. 20009

**BY USPS**

**ADVANCE COPY BY EMAIL TO: FOIA@tsa.dhs.gov**

August 30, 2017

Transportation Security Administration  
TSA-20, East Tower  
FOIA Branch  
601 South 12th Street  
Arlington, VA 20598-6020

**SUBJECT: DEMAND FOR RESPONSE**  
**FOIA Request by William H. Conley, III, dated May 4, 2017.**

Dear Sir or Madam:

This law firm represents William H. Conley, III, who submitted a request for documents to the Transportation Safety Administration (TSA) under the Freedom of Information Act (FOIA), 5 U.S.C. § 552, on May 4, 2017. The TSA advised it located records responsive to Mr. Conley's request. However, it then made an unreasonable request for more information. Mr. Conley immediately responded to the TSA request, but to date, the TSA has not responded to Mr. Conley's FOIA Request.

A letter from Mr. Conley certifying that any and all records concerning him may be accessed, analyzed and released to this law firm is included at **Attachment 1**.

An Affirmation Declaration signed by Mr. Conley to verify his identity is included at **Attachment 2** to the original of this letter, as mailed to the TSA.

The email correspondence containing Mr. Conley's May 4, 2017 FOIA Request, the TSA email with its Request for Information, and Mr. Conley's Response to the TSA Request for Information is attached at **Attachment 3**.

As stated in Mr. Conley's FOIA request, Mr. Conley requested specific documents on an incident that occurred at the Denver International Airport. Mr. Conley's request provided the date and time of the incident and included a detailed narrative for the express purpose of assisting the TSA identify the location within the airport where the incident occurred. Mr. Conley's request further stated:

"The only information I have is the date, time and that I was at the Denver International Airport. The only name I have is TSA Employee "Wood". The Denver PD was also involved."

August 30, 2017

Page 2 of 3

On May 9, 2017, Karen Sheppard, a TSA representative at the airport advised Mr. Conley that the TSA knew the location in the airport where the incident occurred; and, on June 9, 2017, Mrs. Sheppard advised Mr. Conley, "Your file in on my desk and ready to be processed." **Attachment 4.**

Despite the fact that Mr. Conley's FOIA request stated that he did not know the location within the airport where the incident occurred, and despite the fact that the TSA already knew the location within the airport where the incident occurred, the TSA sent an email to Mr. Conley on May 31, 2017, that requested information on the location in the airport where the incident occurred.<sup>1</sup>

Based on the above, the TSA's request for information was not a reasonable request and, as such, the request did not toll the statutory 20-day limit for the TSA's response to Mr. Conley's FOIA request.

Although Mr. Conley had no information responsive to the TSA request for additional information, he immediately responded to the TSA request for by directing the TSA FOIA Unit to Mrs. Sheppard. As such, even if the TSA Request for Information could be considered reasonable, any tolling of the 20-day limit ended on May 31, 2017, when Mr. Conley responded to the TSA Request for Information.

Following Mr. Conley's response to the TSA request for additional information, the Denver Police Department provided records that indicate the incident occurred inside the airport at "North Screening" in the "Main Terminal."

To date, the TSA has not responded to Mr. Conley's FOIA request and it is now well beyond the 20-day limit required by 5 U.S.C. § 552(a)(6)(A)(i). Accordingly, please send all documents responsive to Mr. Conley's FOIA request, to include the file prepared by Mrs. Sheppard, to my office within (10) ten days of this letter.

Mr. Conley is willing to accept documents in electronic in format so long as they are produced in formats accessible to Mr. Conley (e.g., .pdf, .jpeg, .mpeg, or .mov).

Thank you for your prompt attention. If you do not understand this request or any portion thereof, or if you feel that you require clarification of this request or any portion thereof, immediately contact me at (202) 550-0040 or at [matthew@goldsteinpllc.com](mailto:matthew@goldsteinpllc.com).

Yours truly,



Matthew A. Goldstein  
Legal Counsel

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<sup>1</sup> The TSA email did not provide an individualized tracking number or other reference number.

August 30, 2017

Page 3 of 3

## ATTACHMENTS

Attachment 1	Attorney Authorization Letter
Attachment 2	Affirmation Declaration (with original letter)
Attachment 3	FOIA Correspondence
Attachment 4	TSA Correspondence Confirming its Possession of Record

**ATTACHMENT 1**

August 21, 2017

Transportation Security Administration  
TSA-20, East Tower  
FOIA Branch  
601 South 12th Street  
Arlington, VA 20598-6020

**SUBJECT: Attorney Authorization for FOIA Request**

Dear Sir or Madam:

The Law Office of Matthew A. Goldstein, PLLC represents me in my Freedom of Information Act (FOIA) request to the Transportation Safety Administration (TSA).

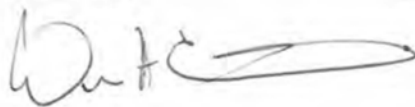
I authorize the TSA and other U.S. Government representatives to speak with and to release any and all records concerning me to Matthew A. Goldstein, PLLC, which may be reached at:

Matthew A. Goldstein  
1875 Connecticut Ave NW, 10th Floor  
Washington, DC 20009  
(202) 550-0040  
matthew@goldsteinpllc.com

I agree that records concerning me may be accessed, analyzed, and released to Matthew A. Goldstein, PLLC.

Thank you in advance for your consideration.

Yours truly,

A handwritten signature in black ink, appearing to read "Bill Conley", with a long horizontal flourish extending to the right.

William H. Conley, III  
33631 E. Future Rd.  
Marana, Arizona 85658-8862  
(520) 730-2635  
billc\_swid@yahoo.com

**ATTACHMENT 2**



Attachment 2 contains Personally Identifiable Information (PII). It is therefore included only in the paper copy mailed to DHS by USPS and is not included in the electronic copy emailed over the Internet.

**ATTACHMENT 3**

On Wednesday, May 31, 2017, 6:27 AM, Bill conley <billc\_swd@yahoo.com> wrote:

Your email leads me to believe that you haven't even started looking into my FOIA request. Please call Karen Sheppard @ [303-342-6512](tel:303-342-6512). She is the TSA Quality assurance manager at Denver international and has the details you need. She also works for TSA which amazes me that you don't have her number nor did you ask her for this information.

Please make sure you notify Mrs Sheppard that my FOIA request to you was made before I talked with her and that I am not dismissing or waiving the complaint I made through her nor am I asking her to discontinue her investigation.

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Good Morning,

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Full Name: William Conley  
Address: None Given all communications can be delivered via email  
Phone: None Given all communications can be delivered via email

Email: [billc\\_swd@yahoo.com](mailto:billc_swd@yahoo.com)

Fees: I do not wish to pay any fees.

Type of request: FOIA but I reserve the right to file for a Privacy Act request at a later date.

Specific information:

- Any and all video and/or photographs and/or audio recording involving or related to the incident. This includes video take at the Body Scanner where the abuse started.
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- Names and Official Badge numbers of all TSA employees involved.

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Respectfully,

William H. Conley III

Thank You, Bill Conley

**ATTACHMENT 4**

Mr. Conley – Once you receive the information from the FOIA office, you'll have an account of everyone's statement.

Have a good day - Karen

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**Sent:** Friday, June 16, 2017 10:24 AM  
**To:** Sheppard, Karen <karen.sheppard@tsa.dhs.gov>  
**Subject:** Re: TSA Denver PD incident 04/26/2015

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On Friday, June 16, 2017, 9:13 AM, Sheppard, Karen  
<karen.sheppard@tsa.dhs.gov> wrote:

Mr. Conley – Thank you for taking time out of your day to first meet with me at the Denver International Airport (DIA) and for the exchange of e-mails.

It was unfortunate that you had a less than pleasant experience at DIA. Officers on the checkpoint screen approximately 50,000 passengers a day. It's regrettable that your experience went sideways.

When I met with you on May 8<sup>th</sup>, on C-Concourse of the airport, your story was very compelling. Based upon your organized and passionate explanation of events, I began a thorough investigation into your complaint.

When I started reading witness statements and in particular, when I started reviewing video, I saw another side of the story on what occurred that day. When you receive the information from the FOIA Office, I respectfully request that you review the video clips and read all statements.

To briefly summarize, the incident started at approximately 8:08 p.m. and wrapped up at about 8:17 p.m. The total time you were actually in the screening process was approximately 5 seconds. You spent approximately 7 seconds speaking with the second Officer. From there, you approached Supervisor Rob Wood, and per both the video and from speaking Rob, you came at him with a high rate of speed, shaking your finger in his face. He wasn't sure what you needed. Mr. Wood's manager does not reside on



the checkpoint. He told me that he attempted to explain this to you. He said that he pointed to the Denver Police Officer, not because he was Rob's manager, but because you told him that you wanted to speak to someone else in command. Two Officers standing close-by confirmed this conversation.

I've spoken to both Supervisor Wood and briefed his manager about your screening experience. It was an unfortunate chain of occurrences, on the parts of both the TSA Employees involved and yourself.

I look forward to hearing from you if you have any questions after you are able to review the relevant statements and video clip.

I wish you well – Karen

Karen Sheppard  
Customer Support/Stakeholder – Team Colorado  
[Karen.Sheppard@tsa.dhs.gov](mailto:Karen.Sheppard@tsa.dhs.gov)  
Desk: (303) 342-6512

**From:** Bill conley [[mailto:billc\\_swd@yahoo.com](mailto:billc_swd@yahoo.com)]  
**Sent:** Friday, June 9, 2017 9:12 AM  
**To:** Sheppard, Karen <[karen.sheppard@tsa.dhs.gov](mailto:karen.sheppard@tsa.dhs.gov)>  
**Subject:** Re: TSA Denver PD incident 04/26/2015

Thank you.

Sent from Yahoo Mail for iPhone

On Friday, June 9, 2017, 10:00 AM, Sheppard, Karen  
<[karen.sheppard@tsa.dhs.gov](mailto:karen.sheppard@tsa.dhs.gov)> wrote:

Bill – Good morning; I apologize for not getting back with you sooner, it's been a crazy last few weeks. Your file is on my desk and ready to be processed. You can expect to hear from me next week.

Until then, have a nice weekend – Karen

Karen Sheppard

Customer Support/Stakeholder – Team Colorado

[Karen.Sheppard@tsa.dhs.gov](mailto:Karen.Sheppard@tsa.dhs.gov)

Desk: [\(303\) 342-6512](tel:(303)342-6512)

Cell: [\(303\) 919-2787](tel:(303)919-2787)

**From:** Bill conley [[mailto:billc\\_swd@yahoo.com](mailto:billc_swd@yahoo.com)]

**Sent:** Friday, June 9, 2017 8:55 AM

**To:** Sheppard, Karen <[karen.sheppard@tsa.dhs.gov](mailto:karen.sheppard@tsa.dhs.gov)>

**Subject:** Re: TSA Denver PD incident 04/26/2015

Mrs. Sheppard,

I sent you an email last week - may I ask the disposition of your investigation?

Sent from Yahoo Mail for iPhone

On Tuesday, May 9, 2017, 4:07 PM, Sheppard, Karen <[karen.sheppard@tsa.dhs.gov](mailto:karen.sheppard@tsa.dhs.gov)> wrote:

Bill – Yes, I have a good view of you coming out of the scanner and speaking with the officer. We've also book marked several other cameras throughout the checkpoint. We're good with camera views.

I'll be back in touch soon. Thanks – Karen

**From:** Bill conley [mailto:billc\_swd@yahoo.com]  
**Sent:** Tuesday, May 9, 2017 3:02 PM  
**To:** Sheppard, Karen <karen\_sheppard@tsa.dhs.gov>  
**Subject:** Re: TSA Denver PD incident 04/26/2015

Can you see the activity at the scanner that started all this?

Sent from Yahoo Mail for iPhone

On Tuesday, May 9, 2017, 4:00 PM, Sheppard, Karen <karen.sheppard@tsa.dhs.gov> wrote:

Bill – Good Afternoon; yes, the video has been located and saved. I've reviewed the clip just one time. Once I finish collecting all statements of those involved, I'll go back and view it again. As there were several people involved, it may take a few days to receive all statements. Once I do, I'll get back to you.

Have a good day – Karen

Karen Sheppard

Customer Support/Stakeholder – Team  
Colorado

Karen.Sheppard@tsa.dhs.gov

Desk: (303) 342-6512

Cell: (303) 919-2787

**From:** Bill conley  
[mailto:billc\_swd@yahoo.com]  
**Sent:** Tuesday, May 9, 2017 2:52 PM  
**To:** Sheppard, Karen  
<karen.sheppard@tsa.dhs.gov>  
**Subject:** Re: TSA Denver PD incident  
04/26/2015

Were you able to locate the video?

Sent from Yahoo Mail for iPhone

On Monday, May 8, 2017, 12:18 PM, Sheppard,  
Karen <karen.sheppard@tsa.dhs.gov> wrote:

Bill – I appreciate your efforts on this case. Thank you for the write-up; it will assist me in locating you on CCTV.

I'll be in touch – Karen

Karen Sheppard

Customer Support/Stakeholder –  
Team Colorado

Karen.Sheppard@tsa.dhs.gov

Desk: (303) 342-6512

Cell: (303) 919-2787

**From:** Bill conley  
[mailto:billc\_swd@yahoo.com]  
**Sent:** Monday, May 8, 2017 10:36 AM  
**To:** karen.sheppard@dhs.gov  
**Subject:** Fw: TSA Denver PD incident  
04/26/2015

Mrs Sheppard,

I first want to thank you and let you know that I appreciate your professionalism and your concern and dealing with the matter that occurred on April 26. Below is the narrative that I memorialized in writing within 15 minutes of the incident on April 26.

- W. Conley III

On April 26 2017 at approx. 2020 hours I was passing through the TSA security check point to board a flight. While exiting through the body scanner I was ordered by one of the TSA bag-screener to stop and extend my arms out like an airplane. I complied with the order when another

TSA bag-screener began laughing. When I asked why he was laughing the TSA bag-screener told me that the TSA bag-screener that stopped me was forcing people to lift their arms "to lighten things up". He went on to say that the commands were not necessary. I asked to speak to a TSA supervisor where I was directed to TSA bag-screener "WOOD" as indicated on his uniform shirt. WOOD told me that he was a supervisor.

I asked TSA bag-screener WOOD if he was the supervisor and he said yes. I began to explain what happened with the two TSA bag-screener's at the body-scanner and asked for him to take my complaint where he refused to. I then asked for TSA bag-screener WOOD's supervisor where he refused to tell me and pointed to a Denver Police officer. WOOD repeated pointing to the Police officer and verbally telling me "that is my supervisor". He not only confused me but WOOD also confused two other TSA bag-

screeners who pointed in the opposite direction towards a TSA desk.

I repeated my request to TSA bag-screener WOOD and he refused to take my complaint or to contact his supervisor. It was at this time where TSA bag-screener WOOD demanded my ID and boarding pass in a clear attempt to intimidate me.

I had already cleared the TSA bag-screening checkpoint and was free to continue to my gate. TSA bag-screener WOOD told one of the police officers that I was trespassing;

One of the officers demanded ID under threat of arrest knowing that I had already identified myself via a government issued ID and my boarding pass as part of the TSA screening process.

I was detained by two Denver police officers and one LT. I was told by the LT. that I was being detained "to check for

warrants” and that I was not free to leave. It’s clear that the LT had no reason to suspect that I had warrants and had no reasonable reason to detain me. The officer demanding ID and the LT knew prior to demanding ID and detaining me that I had already identified myself as part of the TSA process.

I am formally filing a complaint against the officer demanding my identification and the LT who detained me. I was not trespassing. DIA is a public area and I had a lawful reason to be at the airport and was cleared by TSA to enter the restricted area in order to board my flight. I followed the process required by TSA. This was a clear case of being harassed and threatened by the TSA and Denver PD. If the police officers relied on TSA bag-screener WOOD’s charges that I was trespassing in order to detain me then I am also formally asking the Denver Police department to take my criminal complaint against TSA



bag-screener WOOD for giving false information to a police officer.

A video of the entire encounter was filmed for my protection.

Respectfully,

William H. Conley III

**EXHIBIT 4**

**From:** Dennis, Deborah Deborah.Dennis1@tsa.dhs.gov  
**Subject:** Status: TSA FOIA 2017-TSFO-00259  
**Date:** August 31, 2017 at 11:24 AM  
**To:** matthew@goldsteinpllc.com  
**Cc:** Dennis, Deborah Deborah.Dennis1@tsa.dhs.gov

DD

Greetings,

My name is Deborah Dennis and I am the TSA FOIA Analyst responsible for processing the request of your client William Conley. Please be advised, the TSA processes requests on a first-in, first-out basis. Currently, there are **37** requests ahead of yours in my processing queue, and at this time I *estimate* the processing of your request will take **30-45** days from the date of this email. To check the status of your request, go to

<https://www.dhs.gov/foia-status> and enter your FOIA case number: **2017-TSFO-00259**.

Note: If the status of your request indicates "Documents Added" it does not mean they have been reviewed for release under FOIA. Please don't hesitate to contact me at [Deborah.Dennis1@tsa.dhs.gov](mailto:Deborah.Dennis1@tsa.dhs.gov) should you have any questions regarding the processing of your request.

Regards,

Deborah Dennis  
TSA FOIA Branch

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**From:** Matthew Goldstein [<mailto:matthew@goldsteinpllc.com>]  
**Sent:** Wednesday, August 30, 2017 9:50 PM  
**To:** FOIA <[FOIA@tsa.dhs.gov](mailto:FOIA@tsa.dhs.gov)>  
**Subject:** FOIA Request by William Conley Dated May 4, 2017

Dear TSA FOIA Office,

Attached please find an advance copy of a letter requesting a response to the FOIA Request submitted by my client William H. Conley, III.

Mr. Conley submitted his FOIA Request to the TSA on May 4, 2017.

The TSA has not responded to Mr. Conley's request and it is beyond the statutory 20-day limit for the TSA's response.

Additional information is provided in the attached letter.

Thank you for your prompt attention to this matter and please call me with any questions at (202) 550-0040.

-Matt

Matthew A. Goldstein | Counsel  
GOLDSTEIN PLLC  
1875 Connecticut Ave NW, 10th Floor

Washington, D.C. 20009

C: 1.202.550.0040

[www.GoldsteinPLLC.com](http://www.GoldsteinPLLC.com)

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CONLEY FOIA Mail Attachment  
Ltr 30A...PY.pdf