

Complaint Exhibit D

SPARACINO

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By Electronic Mail

September 24, 2019

Defense Intelligence Agency
ATTN: FAC2A1 (FOIA)
7400 Pentagon
Washington, DC 20301-7400
Email: FOIA@dodiis.mil

Re: Freedom of Information Act Request

Dear FOIA Officer:

My firm represents over 1,200 American veterans, civilians, and families (including over 180 Gold Star Families), in connection with deaths and injuries caused by terrorists in Iraq. On behalf of our clients, we filed a lawsuit against pharmaceutical and medical device companies that contracted with the Iraqi Ministry of Health, alleging that they funded terrorists who killed or wounded thousands of Americans in Iraq. As part of our investigation of these allegations, and on behalf of our clients who have made great sacrifices in connection with America's involvement with Iraq, we submit this request under the Freedom of Information Act, 5 U.S.C. §§ 552, et seq. ("FOIA") for copies of the following records:

Records Requested

- A. All intelligence (HUMINT, SIGINT, or any other intelligence type) reports, evaluations, analyses, assessments, and collection activities – including finished intelligence products, Intelligence Information Reports ("IIRs"), document exploitation reports ("DOCEX"), source-directed requirements ("SDRs"), Tactical Interrogation Reports ("TIRs"), information papers, and Defense Intelligence Assessments – concerning or referencing any of the following six (6) subjects:
1. **Jaysh al-Mahdi** (a/k/a Jaysh al-Mehdi, Jaish al-Mahdi, Jaish al-Mehdi, The Mehdi Army, The Mahdi Army, the Mahdi Militia, or JAM); *or*
 2. **Muqtada al-Sadr** (a/k/a Muqtada Sadr, or Muktada al-Sadr); *or*
 3. The **Iraqi Ministry of Health** (a/k/a MOH, Ministry of Health, Health Ministry, or Minister of Health); *or*
 4. **Kimadia** (a/k/a Kemadia, Kimadiya, or Kamadia); *or*
 5. The **Facilities Protection Service** ("FPS"); *or*
 6. Any so-called "**Special Group**," cell, or militia affiliated with Jaysh al-Mahdi, such as **Asa'ib Ahl al-Haq** ("AAH") (a/k/a Asaib Ahl al-Haqq, Asaib Ahl al-Haq, or the League of the Righteous).

And...

B. Which **also satisfies one or more** of the following three (3) criteria:

1. Cites, lists, references, contains, or responds to the following Defense Department / U.S. Military **“Requirements”** (also known, abbreviated, or referred to as “REQS”): D-1J2-1584-001-07; U-MNF-1584-0013-07; U-MNF-1590-0021-07; U-UDX-2711-028-05; DIAC181304008; CIA8191513308; CIA5261305805; DIAC152408207; or DIAC158415408; *or*
2. Authored, cleared, reviewed, evaluated, vetted, graded, drafted, compiled, or generated by an interrogator, collector, analyst, or other intelligence professional with one of the following **Field Reporter Numbers** (“FRNs”): 2-24134, 2-24135, 2-24104, JSP1438, 2-A4188, 2-A9020, 2-A4188, 2-23409, 7-03975, 7-05975, 7-52516, 2-20589, 2-40558, 7-02598, or 2-A8562; *or*
3. Tagged, labeled, identified, denoted, or categorized with – or assigned to – the topical nickname or subject codename (also known, abbreviated, or referred to as “SUBJ” or “Report Subject”) **“IRIDIUM INGOT.”**

The relevant date range for this request is **January 1, 2005 through December 31, 2011.**

Please search for responsive records regardless of format, medium, or physical characteristics. Where possible, **please produce records electronically in PDF format.** We seek records of any kind, including electronic records, audiotapes, videotapes, and photographs. Our request includes any letters, emails, facsimiles, telephone messages, voice mail messages, and transcripts, notes, or minutes of any meetings, telephone conversations, discussions, and any attachments to such records. If any of this information is currently classified or restricted distribution, we ask that you submit the records for declassification in accordance with Executive Order 13526, and all other relevant regulations, policies and orders governing declassification.

5 U.S.C. § 552(b) prescribes the process for any responsive records, or portions of records, you deem covered by a FOIA exemption: “[a]ny reasonably segregable portion of a record shall be provided...after deletion of the portions which are exempt under this subsection. The amount of information deleted, and the exemption under which the deletion is made, shall be indicated on the released portion of the record, unless including that indication would harm an interest protected by the exemption in this subsection under which the deletion is made. If technically feasible, the amount of the information deleted, and the exemption under which the deletion is made, shall be indicated at the place in the record where such deletion is made.”

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I am willing to pay fees for this request up to a maximum of **\$200**. If the fees for this request exceed that amount, please inform me first. Do not hesitate to contact me with any questions or concerns, and please mail responsive materials to the address in the letterhead above.

Sincerely,

A handwritten signature in black ink, appearing to read "Dustin M. Lee". The signature is fluid and cursive, with a large initial "D" and "L".

Dustin M. Lee
dustin.lee@sparacinoplhc.com