

Exhibit A

The Washington Post

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April 3, 2020

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

Re: EXPEDITED FOIA Request 20200403DOSnj for two cables warning of lack of testing precautions at a Wuhan Institute of Virology and warning that Wuhan could be at the epicenter of a health crisis

Dear Information Officer:

Pursuant to the Freedom of Information Act (FOIA), I hereby request the following:

Two cables sent from the US Mission in China about former counselor of Environment, Science, Technology and Health Brian “Rick” Switzer’s March 2018 visit to the Wuhan Institute of Virology (WIV). The cables included information about the WIV, including potentially unsafe procedures and security lapses at the institute.

*The two cables were marked **unclassified**.*

Please place this request in the expedited, simple processing queue.

I am a representative of the Washington Post, a news media organization primarily engaged in the dissemination of information that is **urgently needed to inform the public of actual or alleged Federal Government activity**. This request qualifies for expedited processing because:

- 1) knowledge of the origin and efforts to prevent the the COVID-19 pandemic is a matter of current exigency to the American public;
- 2) delay in releasing information about the State Department’s knowledge and reporting will compromise the recognized public interest in being informed of the State Department’s study and warning of unsafe virus

testing conditions in Wuhan, China; 3) State Department reporting on unsafe practices at Chinese testing facilities are clearly federal government activity; and 4) there are credible claims, including by the United States Senate Select Committee on Intelligence that aspects of the government's activity in monitoring Chinese practices and reporting the origin of the Covid-19 virus are improper. I certify that this information is true and correct to the best of my knowledge. (See *Al-Fayed v. C.I.A.*, 254 F.3d 300, 310 (D.C. Cir. 2001); *Bloomberg, L.P. v. U.S. Food & Drug Admin.*, 500 F.Supp.2d 371, 378 (S.D.N.Y. 2007).

If you regard these documents as potentially exempt from the FOIA's disclosure requirements, I request that you nonetheless exercise your discretion to disclose them. As the FOIA requires under 5 U.S.C. § 552(a)(8), **please release all segregable, non-exempt portions** of documents. To permit me to reach an intelligent and informed decision whether to file an administrative appeal of any denied material, please describe any withheld records (or portions thereof) and explain the basis for your exemption claims.

As required by the statute, please review whether there is any foreseeable harm from disclosing the requested records, or if any potential harm would be limited in comparison to the public interest in disclosure. As required by 5 U.S.C. § 552(a)(8), please release all such information, even if it technically may fall under a FOIA exemption.

As a representative of the news media, The Washington Post qualifies for **news media fee status** under 5 U.S.C. § 552(a)(4)(A)(ii)(II) and, therefore, may not be charged search and review fees. (See *National Security Archive v. U.S. Department of Defense*, 880 F.2d 1381 (D.C. Cir. 1989), cert denied, 110 S.Ct. 1478 (1990)). This request is made as part of a scholarly and news research project that is intended for publication and is not for commercial use. For details on the Post's news reporting activities please see our website at www.washingtonpost.com.

As you know, 5 U.S.C. § 552(a)(4)(A)(viii)(I) prohibits agencies from charging news media organizations duplication fees if the agency does not meet its twenty working day time limit (thirty working days for "unusual" requests).

Additionally, because this information will be used by the Washington Post for the preparation of news articles that will be broadly disseminated to the general public, it will contribute significantly to public understanding of the operations or activities of the government and is not primarily in the Post's commercial interest. As such, please grant a **fee waiver** for any remaining fees incurred.

Please notify me before incurring any cost over \$100.

To expedite the release of the requested documents, please disclose them on an interim basis in **electronic format** as they become available to you, without waiting until all the documents have been processed. If you have any questions regarding my request, including its scope, please contact me at **nate.jones@washpost.com**

Sincerely,
/S/
Nate Jones