

EXHIBIT 3

From: Gonsalves, Davis
Sent: Monday, March 02, 2020 7:05 PM
To: 'foiarequest@state.gov'
Cc: Ringger, Devin Charles; Moore, Ashley
Subject: FOIA Request
Attachments: State Cables Boolean & Specific Cables Request.pdf

Hello, my name is Davis Gonsalves and I am a legal assistant for Willkie Farr & Gallagher LLP. Attached, please find a FOIA request letter from Devin Ringger (cc'd) that contains all required information, including but not limited to:

- information regarding requested materials including timeframe, subject matter, and individuals involved;
- reasons believed as to why the department has the materials;
- maximum fees willing to be paid; and
- contact information required for a response.

If there is any material missing or anything we can do to expedite the process for the requested information, please let Mr. Ringger and me know, and we will be happy to oblige.

All the best,
Davis Gonsalves

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March 2, 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: Freedom of Information Act

To Whom It May Concern,

My firm represents over 380 American veterans, civilians, and their families in connection with deaths and injuries caused by terrorists in Afghanistan. On behalf of our clients, we filed a lawsuit against several U.S. and international contractors, alleging that they made protection payments to terrorists who killed or wounded thousands of Americans in Afghanistan. *See Cabrera et al v. Black & Veatch Special Projects Corporation et al*, Case No. 1:19-cv-03833 (D.D.C.). 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 in Afghanistan, we submit this request under the Freedom of Information Act, 5 U.S.C. §§ 552, et seq. ("FOIA") for copies of the records described below.

Records Requested

Diplomatic cables originating from **Kabul** or **Washington DC** regarding **contracting** or **reconstruction projects** and/or **private security companies** and **terrorist or insurgent finance**. Search terms that may help locate these documents include, but are not limited to: **contractor; subcontractor; security company; security firm; PSC; extortion; protection money; protection payment; mobilization costs; rental payments; security expenditures; security payments; bribe; payoff; vetting; hawala; commitment fee; counterpart per diem; cutout; deactivate; deactivating; ghost; indirect cost; local partner; marketing fee; night letter; tax receipt; tower; transmission mast; Louis Berger; LBG; Black & Veatch; WSP Global; Environmental Chemical Corporation; ECC; ArmorGroup; Centerra; G4S; EOD Technology; EODT; DAI; Development**

Alternatives, Inc.; MTN; Areeba; MENA; Edinburgh; Arafat; ISS-Safenet; Safenet; United States Protection and Investigations; USPI; Servcor; Blue Hackle; Arvin Kam; Watan; Wahab; Dawoud; Taj Mir Jawad; Nadir Khan; Mr. Pink; Timor Shah; Mr. White; Reza Khan; Gul Mohammed; Mirza Khan; Commander Blue; Mullah Omar; Quetta Shura; Mullah Ahmad Bidal; Mullah Brader; Mullah Sadeq; Qabool; Azizabad; Tony; P2K; Loya Paktia; Gardez-Khost Highway; IFC; International Finance Company; MIGA; Multilateral Investment Guarantee Agency; Snooker; Romeo and Juliet; Romeo & Juliet; Commando Riot; crossing point.

Responsive cables include, but are not limited to the following:

- U.S. State Department Cable, Afghanistan: Update On Energy Projects, Cable # 08KABUL3085-_a (Nov. 30, 2008).
- U.S. State Department Cable, Using Connection Technologies To Promote US Strategic Interests in Afghanistan, Cable # 09KABUL2020 (July 23, 2009).
- U.S. State Department Cable, NSA Spanta Stresses That the Corruption ‘Elephant’ Needs To Be Tackled Together, Cable # 10KABUL5184 (October 2, 2010).
- U.S. State Department Cable, Confronting Afghanistan’s Corruption Crisis, Cable # 05KABUL3681 (declassified by U.S. Department of State on December 11, 2015, at SIGAR’s request) (September 15, 2005).
- U.S. State Department Cable, Accountable Assistance for Afghanistan (A3): Corrected Copy 2, Cable # 11KABUL4054 (July 5, 2011).

The relevant date range for this request is **January 1, 2002 through December 31, 2014.**

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 of documents.

For any responsive records, or portions of records, you deem covered by any applicable FOIA exemption, 5 U.S.C. § 552(b) prescribes the appropriate process: “[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.”

I am willing to pay fees for this request up to a maximum of \$250. If the fees for this request exceed that amount, please inform me first. If it expedites the agency's release of the requested documents, I am willing to accept disclosure on an interim, rolling basis as they become available. Please do not wait for all of the agency's relevant systems of record to be searched, or all of its relevant records to be processed.

To discuss any aspect of this request, please contact my associate, Devin Ringger, at (202) 303-1463, or via email at dringger@willkie.com. Pursuant to 32 eCFR §286.5(c) my preference is to receive these records in their original native electronic format, and if that is not available, in PDF image format (one image per record, in color as applicable) through my email address. If the records prove too large to attach via email, my colleagues or I can provide a secure FTP link in which to upload the records.

Sincerely,

/s/ Michael J. Gottlieb