

# EXHIBIT 4

**From:** Gonsalves, Davis  
**Sent:** Monday, March 02, 2020 7:07 PM  
**To:** 'foiarequest@state.gov'  
**Cc:** Ringger, Devin Charles; Moore, Ashley  
**Subject:** FOIA Request  
**Attachments:** State Cables Defendants 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 Request

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** relating to Afghanistan and including the following entities: "**Louis Berger Group, Inc.**" or "**Louis Berger International, Inc.**" or "**Black & Veatch**" or "**Black & Veatch Special Projects Corporation**" or "**Black & Veatch Holding Company**" or "**WSP Global Inc.**"; "**Environmental Chemical Corporation**"; "**ArmorGroup North America, Inc.**" or "**ArmorGroup International plc**" or "**ArmorGroup International Limited**" or "**ArmorGroup Services Limited**" or "**G4S Risk Management Limited**" or "**G4S Holdings International (AG) Limited**" or "**G4S plc**" or "**Centerra Group, LLC**" or "**Wackenhut Services, Inc.**"; "**EOD Technology, Inc.**" or "**Janus Global Operations LLC**" or "**Sterling Operations, Inc.**"; "**DAI Global LLC**" or "**Development**

**Alternatives, Inc.”; “ISS-Safenet”; “MTN Group Limited” or “MTN Afghanistan” or “Middle East and North Africa (MENA) Group” or “MTN (Dubai) Limited” or “Areeba” or “Areeba Afghanistan LLC”**

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](mailto: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