

EXHIBIT 7

From: Gonsalves, Davis
Sent: Monday, March 02, 2020 7:10 PM
To: 'foiarequest@state.gov'
Cc: Ringger, Devin Charles; Moore, Ashley
Subject: FOIA Request
Attachments: State Kabul Embassy 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

Davis Gonsalves
BR&R Paralegal
Willkie Farr & Gallagher LLP
787 Seventh Avenue | New York, NY 10019-6099
Direct: [+1 212 728 3706](tel:+12127283706) | Fax: +1 212 728 8111
dgonsalves@willkie.com | www.willkie.com

WILLKIE FARR & GALLAGHER LLP

1875 K Street, N.W.
Washington, DC 20006-1238
Tel: 202 303 1000
Fax: 202 303 2000

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.

Background

Since at least 2007, the U.S. Department of State ("State") hired private contractors to provide security for the U.S. Embassy in Kabul. State awarded the "Kabul Embassy Guard Contracts" to several entities including: "**ArmorGroup North America, Inc.**" or "**ArmorGroup International plc**" or "**ArmorGroup International Limited**" or "**ArmorGroup Services Limited**" or "**G4S Risk Management Limited**" and "**EOD Technology Inc.**"

Records Requested

All contracts and related documentation (including RFPs, bids, show cause and cure notices, task orders, subcontracts, and audits) concerning **Kabul Embassy Guard Contracts** in Afghanistan including, but not limited to, the following:

- Contract **S-AQMPD-07-C0054** with “**ArmorGroup North America, Inc.**” (CAGE Code 1W7P6) awarded March 2007. The contract start date was March 26, 2007 and the contract end date was December 31, 2010. Issues arising from this contract have been investigated by several government entities, including the Senate Subcommittee on Contracting Oversight which published a report available at <https://www.hsgac.senate.gov/imo/media/doc/Staff%20analysis%20submitted%20by%20McCaskill.pdf>.
- Contract **S-AQMMA-10-F5213** with “**EOD Technology Inc.**” (CAGE Code SUU78) awarded October 2010. The contract start date was September 20, 2010 and the contract end date was March 11, 2011.

The relevant date range for this request is **January 1, 2002 through December 31, 2019**.

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