

EXHIBIT 4

From: Gonsalves, Davis
Sent: Monday, March 02, 2020 6:42 PM
To: 'dcma.lee.hq.mbx.dcma-foia@mail.mil'
Cc: Ringger, Devin Charles; Moore, Ashley
Subject: FOIA Request
Attachments: DCMA Commision on Wartime Contracting 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

DCMA FOIA Office
HQ-DCC
3901 A Avenue
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Email: dcma.lee.hq.mbx.dcma-foia@mail.mil

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.

Background

The **Commission on Wartime Contracting ("CWC")** was a congressionally mandated investigation that spanned three years. The CWC had four major ways of getting information: (1) document requests; (2) private witness interviews; (3) public hearings; and (4) fact-finding trips to Afghanistan. The CWC was physically housed in a Department of Defense ("DOD") building, and although independent, they relied on DOD for logistics. The CWC issued document requests to other government agencies, and interviewed hundreds of witnesses, including government officials, contractors, and third-party experts.

Records Requested

All documents (memos, emails, meeting minutes and transcripts, etc.) authored, created, or sent by the CWC regarding any connection between **contracting or reconstruction projects** and/or **private security companies** and **terrorist or insurgent finance**.

Other search terms that may help locate responsive 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.**

Documents responsive to this request would include, but not be limited to:

- **“Binders” or document collections (physical or digital) or any other collected materials analyzing U.S. reconstruction contracts, including the contracts themselves and any analysis of their relationship to the insurgency.**

The relevant date range for this request is **January 1, 2008 through December 31, 2016**.

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