

EXHIBIT 1

WILLKIE FARR & GALLAGHER LLP

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January 9, 2020

VIA Electronic Submission and Fax

Office of Information Programs and Services
A/GIS/IPS/RL
2201 C Street N.W., Suite 12A40A
Washington, D.C. 20520-0000
Facsimile: (202) 261-8579

RE: Freedom of Information Act Request

Dear Department of State Office of Information Programs and Services,

This is a request under the Freedom of Information Act (5 U.S.C. § 552).

I, Michael Gottlieb, request a copy of the following records, files, reports, products, or other documents be provided to me pertaining to the explosive attack at a district council building which occurred on June 24, 2008 in Sadr City, Iraq, in which the below listed government employee was killed. Please search the State Department Database(s) for the below listed information in response to the request:

- a. Any documents, materials, or reports produced in conjunction with any investigation into or review of the Attack (including any attachments or underlying evidence related to such documents), as well as any report in the agency's possession from another entity such as the FBI, Department of the Army, or U.S. Central Command.
- b. Any cables, wires, messages, or internal or external communications related to the death of the government employee described below, including any conclusion, recommendation, or opinion as to who carried out the Attack and any State or other actor who was in some way connected to or responsible for the Attack.
- c. Any and all employment records relating to the individual.
- d. Device and electronic characterizations associated with the explosive devices used in this Attack identical or similar to known Iranian characterizations.
- e. Device associations of this Attack with known Iranian explosive components (e.g. Use of certain metals, Switch, Initiator, Main Charge, Power Source, Container, and any Enhancements).
- f. Data from this Attack that was previously used as evidence in legal cases (in Iraq or in the U.S.) for prosecution purposes.

Employee's Last Name: Farley
Employee's First Name: Steven L.
Gov. Unit: U.S. Department of State, Provincial Reconstruction Team ("PRT")
Date of Incident: June 24, 2008
Location of Death: Sadr City, Iraq (District Advisory Council Building)
Responding Units: MND-Baghdad G3 OPS, TF 1-6 IN, 3STB, EOD, C/1-6,
Name of representative: Willkie Farr & Gallagher
Relationship to Employee: Attorneys for [REDACTED]

Mailing Address: 1875 K Street NW #1000, Washington DC 20006

Please include all of the agency's responsive documents that are classified below the TS/SIC and/or SAP levels; for example, any documents marked Unclassified (U), Sensitive But Unclassified (SBU), For Official Use Only (FOUO), Confidential (C), Law Enforcement Sensitive (LES), and/or Secret (S).

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.

In order to help you determine my status for the purpose of assessing fees, please take notice that I am counsel for Jessica Farley in federal litigation currently pending before the U.S. District Court for the District of Columbia. Your expedited treatment of this FOIA request is appreciated, as these materials are relevant to pending claims in this litigation.

I am willing to pay fees for this request up to a maximum of \$250. If you estimate that fees will exceed this limit, please inform my office prior to incurring additional costs.

To discuss any aspect of this request, please contact my associate, Nicholas Reddick, at (202) 303-1156, or via email at nreddick@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

Transmission Report

Date/Time	01-09-2020	03:14:44 p.m.	Transmit Header Text	
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January 9, 2020

From: Nicholas Reddick
Willkie Farr & Gallagher LLP

Re: DEPARTMENT OF STATE FOIA REQUEST

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Abbreviations:

HS: Host send	PL: Polled local	MP: Mailbox print	CP: Completed	TS: Terminated by system
HR: Host receive	PR: Polled remote	RP: Report	FA: Fail	G3: Group 3
WS: Waiting send	MS: Mailbox save	FF: Fax Forward	TU: Terminated by user	EC: Error Correct