

EXHIBIT 4

WILLKIE FARR & GALLAGHER_{LLP}

1875 K Street, N.W.
Washington, DC 20006-1238
Tel: 202 303 1000
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January 9, 2020

VIA EMAIL

FOIA/PA Mail Referral Unit
Department of Justice
Room 115
LOC Building
Washington, DC 20530-0001
Phone: (202) 616-3837
E-mail: MRUFOIA.Requests@usdoj.gov

RE: Freedom of Information Act Request

Dear DOJ FOIA Service Center,

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 improvised explosive device attack which occurred on October 4, 2006 (the "Attack") in the Adhamiyah District in Baghdad, Iraq in which the below listed civilian contractor was killed in action. Please search the Department of Justice records for the below listed information in response to the request:

- a. Any documents, materials, memoranda, or reports produced in conjunction with any investigation 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 civilian contractor 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. Explosive Ordinance Disposal (EOD)/Combined Explosives Exploitation Cell (CEXC) investigations and generated reports (storyboards).
- d. Inventory of all items collected and received by EOD.
- e. Copies of CEXC database entries and bar codes of items entered into CEXC investigation database.
- f. All photographs of the IED components collected at the IED attack site and subsequently entered into the CEXC database and used in EOD/CEXC reports.
- g. Any latent fingerprints lifted from IED components and associated actor(s) they belonged to (include nation of origin).
- h. EOD/CEXC "quick snapshot" reports that were shared for intelligence purposes prior to the publishing of the final CEXC report.
- i. All Level I TEDAC lab data or reports.
- j. All Level II TEDAC lab data or reports.
- k. All Level III TEDAC lab data or reports.
- l. Results of digital forensic examinations of IED components associated with this IED attack.

- m. Device and electronic characterizations associated with this IED attack identical or similar to known Iranian characterizations at the time of this IED attack.
- n. Device associations (comparative analysis) of this IED attack with known Iranian IED components (e.g. Switch, Initiator, Main Charge, Power Source, Container, and any Enhancements).
- o. Results of any technical exploitation requests for information associated with this IED attack.
- p. All records of repository or archive database(s) of the C-IED Collaboration Center.
- q. All records related to this IED attack that have been associated with or correlated against IED components collected through the International Collection and Engagement Program (ICEP).
- r. Data from this IED attack that was previously used as evidence in legal cases (in Iraq or in the U.S.) for prosecution purposes.
- s. All related casualty reports and investigation reports stemming from this Attack, including but not limited to the AR 15-6 Investigation Report and Casualty Report.
- t. All related autopsy reports stemming from this Attack.
- u. All related Task Force Troy Reports
- v. All related Significant Activity (“SIGACT”) reports
- w. All related Iraq Threat Finance Cell (“ITFC”) reports
- x. All related Real-Time Regional Gateway (“RTRG”) reports
- y. All related IED-event storyboards
- z. All related “After-Action Reports (“AARs”)
- aa. All related Insurgent Tactics, Techniques, Procedures (“ITP”) reports
- bb. All related Lessons Learned reports

Contractor’s Last Name: Richardson
Contractor’s First Name: Rod
Contractor’s Employer: Falcon Security, Falcon Group
Date of Incident: October 4, 2006 (approximately 14:02)
Location of Death: Adhamiyah District in Baghdad, Iraq (33°25'09.0"N 44°22'50.1"E)
Responding Unit: 9th IA Battalion, MND-Baghdad
Name of representative: Willkie Farr & Gallagher
Relationship to Contractor: Attorneys for [REDACTED]
Mailing Address: 1875 K Street NW #1000, Washington DC 20006
Contractor’s Last Name: Richardson

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 Pamela Thrall 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



Washington, D.C. 20530

January 17, 2020

Nicholas Reddick
1875 K Street, N.W.
Washington, DC 20006-1238

Dear Sir/Madam:

This is in response to your request for records, Tracking Number, EMRUFOIA010920-2. Your Freedom of Information Act and/or Privacy Act (FOIA/PA) request was received by this office which serves as the receipt and referral unit for FOIA/PA requests addressed to the Department of Justice (DOJ). Federal agencies are required to respond to a FOIA request within 20 business days. This period does not begin until the request is actually received by the component within the DOJ that maintains the records sought, or ten business days after the request is received in this office, whichever is earlier.

We have referred your request to the DOJ component(s) you have designated or, based on descriptive information you have provided, to the component(s) most likely to have the records. All future inquiries concerning the status of your request should be addressed to the office(s) listed below:

FOIA/PA
Federal Bureau of Investigation
Department of Justice
170 Marcel Drive
Winchester, VA 22602
(540) 868-4500

FOIA/PA
Bureau of Alcohol, Tobacco, Firearms, and Explosives
Department of Justice
99 New York Avenue, NE
Washington, DC 20226
(202) 648-8740

Sincerely,

MRUFOIA
Logistics Management
Facilities and Administrative Services Staff
Justice Management Division