

EXHIBIT 10

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March 2, 2020

United States Central Command J6-RDF (FOIA)

7115 South Boundary Boulevard

MacDill AFB, FL 33621-5101

Email: centcom.macdill.centcom-hq.mbx.freedom-of-information-act@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.

Records Requested

All documents concerning **debarment** or **suspensions** including (but not limited to) debarments or suspensions under § 841 of the 2012 National Defense Authorization Act, for any of the following contractors or the subcontractors working for them:

- U.S. Protection and Investigation, LLC or its owners, Delmar Spier and Barbara Spier
- USPI
- SERVCOR
- ISS-Safenet

- Watan Group and/or its subsidiaries and affiliates
- Arvin Kam Construction Company and/or Arvin Kam LLC
- Mr. Arafat¹
- Kabul Hackle Logistics Company
- Development Alternatives, Inc. or DAI Global LLC
- Louis Berger Group, Inc. or Louis Berger International, Inc.
- Black & Veach Holding Company, Black & Veach Special Projects Corporation
- 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.
- 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, 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.”

¹ See Alissa J. Rubin & James Risen, *Costly Afghanistan Road Project Is Marred By Unsavory Alliances*, N.Y. Times (May 1, 2011).

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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