

# **EXHIBIT 15**

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March 2, 2020

United States Central Command J6-RDF (FOIA)

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**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.

## Background

According to several news reports, as early as 2006, the **Taliban** and other **insurgent** groups in Afghanistan used **mobile-phone networks** to communicate and coordinate operations. The U.S. military and coalition forces frequently monitored insurgent calls and tracked the movements of insurgents via these networks. As early as 2008, the Taliban and other insurgent groups demanded that mobile-phone carriers and operators shut down all mobile-phone networks at night to protect their operations. Articles reporting on these events include: Yaroslav Trofimov, *Cell Carriers Bow To Taliban Threat*, Wall St. J. (Mar. 22, 2010) available at <https://www.wsj.com/articles/SB10001424052748704117304575137541465235972>; Jon Boone, *Taliban Target Mobile Phone Masts To Prevent Tipoffs From Afghan Civilians*, The Guardian (Nov. 11, 2011) available at <https://www.theguardian.com/world/2011/nov/11/taliban-targets-mobile-phone-masts>; Ismail Sameem, *Taliban stop cell phone signals in key Afghan province*, Reuters (Mar. 24,

2011) available at <https://www.reuters.com/article/us-afghanistan-taliban-phones/taliban-stop-cell-phone-signals-in-key-afghan-province-idUSTRE72N1VI20110324>.

### **Records Requested**

All reports or analyses concerning the **Taliban's** or the **Haqqani Network's** use of **mobile-phone networks**, including the practice of demanding that **towers** or **transmission masts** be shut down, or that service be suspended or deactivated, at night.

The relevant date range for this request is **January 1, 2006 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](mailto: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