

# **EXHIBIT 19**

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May 1, 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

The Drug Enforcement Administration ("DEA"), Treasury Department, and Department of Defense established the **Afghanistan Threat Finance Cell** ("AFTC") in 2008 to track terrorist and insurgent financial transactions and corruption in order to investigate allegations of corruption against contractors and private security companies operating in Afghanistan. During this time, **Tim Jones** was seconded to the AFTC from the DEA and oversaw the production of numerous **DEA-6** and **IIR** documents relating to an investigation of a mobile phone operator, **MTN**, and its practice of paying protection payments to the Taliban. CENTCOM may be in possession of these DEA-6 and IIR documents, as the AFTC was reporting to CENTCOM at the time. In addition, various briefings, PowerPoint presentations/slideshows, and "**Provincial Audits**" were prepared and presented on these subjects to individuals who reported to CENTCOM, including at a minimum **Gen. John Allen**.

### Records Requested

- All documents (PowerPoint presentations, summary documents, audits, emails, etc.) reported or sent to or in the possession of CENTCOM relating to the investigation of suspected protection payments paid by mobile phone operators or providers in Afghanistan, including all **Provincial Audits** discussing **insurgent funding**. The following search terms would likely be relevant in finding these documents: **“MTN Group Limited”** or **“MTN Afghanistan”** or **“Middle East and North Africa (MENA) Group”** or **“MTN (Dubai) Limited”** or **“Areeba”** or **“Areeba Afghanistan LLC”** or **“MTN”**; **tower; cell tower; mobile phone tower; cell phone provider; mobile phone provider; transmission mast; night letter; Khorasan; New Ansari; Operation Reciprocity; Da Afghanistan Bank; Nasir PAK AFG; protection payment.**
  - Relevant documents may be found by running the aforementioned search terms on the documents held by the following custodians:
    - Gen. John Allen
    - Tim Jones
    - Kirk Meyer
    - Frank Caestino
- In addition, we request all DEA-6 and IIR documents (as well as related reports) produced by the DEA/AFTC under country code **“XY”**, or written by the **“Kabul Country Office”** or **“KCO”** that hit upon any of the same search terms: **“MTN Group Limited”** or **“MTN Afghanistan”** or **“Middle East and North Africa (MENA) Group”** or **“MTN (Dubai) Limited”** or **“Areeba”** or **“Areeba Afghanistan LLC”** or **“MTN”**; **tower; cell tower; mobile phone tower; cell phone provider; mobile phone provider; transmission mast; night letter; Khorasan; New Ansari; Operation Reciprocity; Da Afghanistan Bank; Nasir PAK AFG; protection payment.**
  - Responsive documents would include, but would not be limited to, documents relating to the following cases:
    - XY-07-0010 - New Ansari
    - XY-13-0041 - Nasir PAK AFG CO LTD
    - XY-13-0050 - Da Afghanistan Bank
  - Relevant documents may be found by running the aforementioned search terms on the documents held by the following custodians:
    - Gen. John Allen
    - Tim Jones

- Dave Fishing
- Kirk Meyer
- Frank Calestino
- Keith Bishop
- Mark Bertsch
- Frank Hornyak
- John Beasley
- Dave Keekan
- Mike Marsac
- John Seaman
- Rod Millingsly
- Randall Breaux

The relevant date range for this request is **January 1, 2008 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. Pursuant to 32 eCFR §286.5(c) my

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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/ Nicholas Reddick