

EXHIBIT A

Email from Plaintiff
Re: Search Keywords for 2015-03180

search protocols

Sent:  August 18, 2017 1:54 PM

From: Jackie Stevens jackiestevens@protonmail.com

To: Hartzler, Alex (USAILN) Alex.Hartzler@usdoj.gov

Hi Alex,

Thanks for flagging the size of the release at present.

How about using search terms of:

"offset"

"contract"

"agreement"

"censor"

Please note that *denotes wildcard for these terms and suffices, such as "censors."

In addition please search for the following as well.

"Al Jazeera"

"Request for Proposal"

"intelligence"

Boeing

"natural gas"

"optics"

"RFP"

sales

weapons

train*

Bienen

Dennis

arrest

jail

image

If you could also request the number of documents/year I would appreciate it.

I have a current release that is actually larger than this for the ICE contracts and I am not waiving my right to the entire release but providing these terms for purposes of prioritization, in addition to the most recent 750 pages.

Thanks so much for your help with this.

Jackie

Jacqueline Stevens

Professor

Northwestern University

(847) 467-2093

----- Original Message -----

Subject: Quick call?

Local Time: August 18, 2017 10:12 AM

UTC Time: August 18, 2017 3:12 PM
From: Alex.Hartzler@usdoj.gov
To: Jackie Stevens <jackiestevens@protonmail.com>

Jackie,

Do you have time for a quick call today? I have a question I want to run by you. Should just take a minute.

I have to leave the office at 1:00 today; if you don't get this by then or aren't free, maybe we can talk Monday or Tuesday? My schedule is pretty open both days.

Thanks,
Alex

Alex Hartzler
Assistant United States Attorney
Northern District of Illinois
219 South Dearborn Street, Fifth Floor
Chicago, Illinois 60604
(312) 886-1390
alex.hartzler@usdoj.gov

EXHIBIT B

Email from Alexander Hartzler:
Wildcard Search in Question

RE: search protocols

Received: Tuesday, August 22, 2017 10:31 AM

From: Hartzler, Alex (USAILN) Alex.Hartzler@usdoj.gov

To: Jackie Stevens jackiestevens@protonmail.com

Jackie, just to follow up quickly, State is running these terms to see what turns up. There is some question of whether they can do the wildcard searches. Will follow up again when I know more.

You may have just seen our 9/14 hearing get bumped by the court to 9/20. I might be unavailable on 9/20, in which case maybe we can agree on some alternate dates and I'll call the courtroom deputy to see if we can reschedule. No need to do anything just yet.

From: Hartzler, Alex (USAILN)
Sent: Friday, August 18, 2017 12:58 PM
To: 'Jackie Stevens' <jackiestevens@protonmail.com>
Subject: RE: search protocols

Thanks. Will get back to you early next week.

From: Jackie Stevens [<mailto:jackiestevens@protonmail.com>]
Sent: Friday, August 18, 2017 12:55 PM
To: Hartzler, Alex (USAILN) <AHartzler@usa.doj.gov>
Subject: search protocols

Hi Alex,

Thanks for flagging the size of the release at present.

How about using search terms of:

"offset"

"contract"

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Jackie

Jacqueline Stevens

Professor

Northwestern University

(847) 467-2093

----- Original Message -----

Subject: Quick call?

Local Time: August 18, 2017 10:12 AM

UTC Time: August 18, 2017 3:12 PM

From: Alex.Hartzler@usdoj.gov

To: Jackie Stevens <jackiestevens@protonmail.com>

Jackie,

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Thanks,

Alex

Alex Hartzler

Assistant United States Attorney

Northern District of Illinois

219 South Dearborn Street, Fifth Floor

Chicago, Illinois 60604

(312) 886-1390

alex.hartzler@usdoj.gov

EXHIBIT C

**Email from NU CEO/Dean Everette Dennis to U.S. Ambassador in
Qatar, from FOIA No. F-2015-03180**

Dear Ambassador Dana-

I had hoped to see you at U.S. National Day last evening, but was delayed and unable to come. I had hoped to thank you personally for the important role you played in the extension of our contract with the Qatar Foundation which occurred last week. The meeting you had some months back with our Board Chairman and Provost was critical in providing necessary information that helped make all this happen. Well beyond that, your support for us here and our other American schools is important and sustaining.

We will soon complete our 8 year mark here and have been assured of a contract that takes us to the year 2028, signaling not only support for us and what we've done, but to our peer schools here as well. Good news for all—and for us, a new lease of life.

My thanks to you for all you did to help make this happen.

Warm regards,

Ev

Everette E. Dennis
Dean and CEO
Northwestern University in Qatar

T:
M:

B6

www.qatar.northwestern.edu

EXHIBIT D

**Email from Plaintiff
Responsive Documents not Produced**

RE: Stevens v. State - February 5, 2018 - "-80"

Received: February 6, 2018 1:36 PM

From: Hartzler, Alex (USAILN) Alex.Hartzler@usdoj.gov

To: Jackie Stevens jackiestevens@protonmail.com

Hi Jackie,

- 1) Yes.
- 2) Paragraph 2 of the cover letter lists the exemptions.
- 3) I will get back to you on this one—will try to respond by early next week.

-Alex

From: Jackie Stevens [mailto:jackiestevens@protonmail.com]

Sent: Monday, February 05, 2018 3:46 PM

To: Hartzler, Alex (USAILN) <AHartzler@usa.doj.gov>

Subject: Re: Stevens v. State - February 5, 2018 - "-80"

Alex,

Thanks for this. Three questions:

- 1) In December I believe you informed me that the final production would be at the beginning of February. Is it the position of your client that as of today the State Department has either produced or withheld all documents responsive to my requests for cases -03180, -03185, and -03575?
- 2) The cover letter from Mr. Stein indicates two documents were withheld in full but provides no explanation for this. Are you aware of the exemption(s) being claimed?
- 3) As I mentioned on previous occasions, it is obvious from internal references that there are additional responsive documents that have not been produced; I have shared these specific concerns with you since last spring and yet do not see the documents referenced, e.g., contracts, disbursements, and email associated with the EAD operation at NU-Q. Last month's release included an email from the NU Dean thanking the Ambassador for meeting with the Chair of NU's Board of Trustees and Provost and sharing information useful for NU's contract negotiations with Qatar, but none of the information about the meeting itself was shared with me, including its arrangements, memoranda, email, etc.

Do you have any information about these missing items?

Thanks so much for your help with this.

Jackie

Jacqueline Stevens
Professor
Northwestern University
(847) 467-2093

----- Original Message -----


On February 5, 2018 3:02 PM, Hartzler, Alex (USAILN) <Alex.Hartzler@usdoj.gov> wrote:

Jackie,

Attached is the State Department's February 5, 2018 production in response to the request ending in -80.

Alex Hartzler
Assistant United States Attorney
Northern District of Illinois
219 South Dearborn Street, Fifth Floor
Chicago, Illinois 60604
(312) 886-1390
alex.hartzler@usdoj.gov

RE: meeting with Ambassador

Sent:  February 23, 2018 4:40 PM

From: Jackie Stevens jackiestevens@protonmail.com

To: Hartzler, Alex (USAILN) Alex.Hartzler@usdoj.gov

Dear Alex,

Yes, and also background policies and other materials about Qatar and the NU campus on which the Ambassador was relying for the information she was conveying to NU.

I have the reference to the EAD in a much earlier communication with you that I'll look for now. Finally, I want to confirm that you are of course right and will wait for your MSJ along the lines suggested by Judge Lee.

Jackie

Jacqueline Stevens
Professor
Northwestern University
(847) 467-2093

----- Original Message -----

On February 23, 2018 4:28 PM, Hartzler, Alex (USAILN) <Alex.Hartzler@usdoj.gov> wrote:

Thanks. OK, so I see that the email in document number C06341564 describes a meeting between Dana Shell Smith (U.S. Ambassador to Qatar) and NU Qatar's Board Chairman and Provost. Do I have it right that your basic question is, where is the other correspondence relating to that meeting?

And then, I really apologize for any obtuseness, but regarding the EAD issue, can you clarify for me which request you are asking about, and what documents missing? I think this is the one where you are saying there should be underlying contracts, etc.—is that right?

One other question I have is whether you know which (b)(6) redactions you *are* going to challenge. Will be helpful to know as we begin the Vaughn process.

Thanks,
Alex

From: Jackie Stevens [<mailto:jackiestevens@protonmail.com>]
Sent: Thursday, February 22, 2018 4:13 PM
To: Hartzler, Alex (USAILN) <AHartzler@usa.doj.gov>
Subject: RE: meeting with Ambassador

Sorry, it's 03180! and the page is C06341564 (it's page one of part 3 of 4 in the most recent release). Thanks!

Jacqueline Stevens
Professor
Northwestern University
(847) 467-2093

----- Original Message -----

On February 22, 2018 3:20 PM, Hartzler, Alex (USAILN) <Alex.Hartzler@usdoj.gov> wrote:

Thanks. Did you mean to attach the email referenced in the first paragraph? Or you can refer me to the production/page number, if you have it handy.

From: Jackie Stevens [<mailto:jackiestevens@protonmail.com>]
Sent: Thursday, February 22, 2018 3:18 PM
To: Hartzler, Alex (USAILN) <AHartzler@usa.doj.gov>
Subject: meeting with Ambassador

Alex,

Here are my notes on 03181:

The response to 03181 is contradicted by other documents, including the email in this release from the Dean of NU's Qatar campus thanking the Ambassador for providing information to NU's Chair of the Board and NU's Provost that helped them renew their contract with the Qatar Foundation.

That email makes it clear that:

- a) the US does have a policy around establishing U.S. campuses in Qatar and the large number of other communications make it clear that the State Dept. is working with these campuses; and
- b) also, there is a cable from an earlier time frame that specifically connects State Dept. concerns about Al Jazeera with establishing campuses--so there should be policy and other reports about this that have not been produced;
- c) the other documents associated with the planning for that meeting have not been produced, either -- which they should have been either because of the general parameters of the request or because these documents are responsive to my request

In addition, there are contracts and other documents including disbursements referenced for an organization called EAD that was contracted to train Gulf state journalists at Northwestern and these were not produced. I wrote to you about this much earlier but am unable to find the specific reference at present. I'll keep looking and let you know by tomorrow.

Jackie

Jacqueline Stevens

Jackie,

Got the spreadsheet in your other email—thanks.

Do I have it right that you are challenging: **(a)** all documents withheld in full, and **(b)** all redactions that are listed in column H (“Redactions in Question”) on the spreadsheet?

For example, in lines 24 through 29 on the spreadsheet, nothing appears in column H—does that indicate no challenged redactions?

Assuming so, then we will address at summary judgment the documents withheld in full and the redactions mentioned in column H, and we’ll note that you are not challenging any other withholdings. OK?

If I have it wrong just let me know.

Hope to get back to you soon re: reimbursement.

-Alex

From: Jackie Stevens [<mailto:jackiestevens@protonmail.com>]
Sent: Tuesday, March 06, 2018 12:03 PM
To: Hartzler, Alex (USAILN) <AHartzler@usa.doj.gov>
Subject: tracking documents withheld and objections to redactions, and fee question

Alex,

The attached spread sheet indicates my objections to redactions. As we discussed, we are not objecting to personal information withheld under b(5) but to large chunks redacted and entire documents withheld. It is my position that the FOIA law requires the release of segregable information. I am therefore objecting to the withholding of all documents in their entirety, as well as those portions indicated in the attached spread sheet.

Finally, I wanted to follow up to see if your office will object to reimbursing me for payments to student research assistants and other other administrative support for the litigation. If your office will not object to this, then I will continue to represent myself pro se. Otherwise, I will need to turn the case over to an attorney and he will be eligible for payment of his fees and expenses. I of course reserve the right to do this at any time, though obviously the longer I do this pro se, the less money the taxpayers are charged for this.

Jackie
Jacqueline Stevens
Professor
Northwestern University
(847) 467-2093

 **Redaction Challenges for USSD.xlsx** (34.51 KB)

