



U.S. Department of Justice

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March 1, 2019

BY EMAIL

Jacqueline Stevens
601 University Place
Political Science Department
Northwestern University
Evanston, Illinois 60208

Re: *Stevens v. U.S. Department of State*, 17 C 2494 (N.D. Ill.)

Dear Ms. Stevens:

Per Judge Lee's order on December 20, 2018, below is an explanation of the State Department's process for searching for records responsive to the three FOIA requests that precipitated the above-captioned lawsuit.

I. Request F-2015-03180

You submitted the following FOIA request to the Department on February 11, 2015, seeking:

All State HQ and consular Qatar materials in all systems [sic] records and elsewhere referencing Northwestern University's Qatar campus. Material requested includes but is not limited to memorandums, cables or e-mails, notes, reports, correspondence with other agencies, members of Congress (or staff), and private firms or individuals.

The timeframe of the request was January 1, 2005, to present.

The Department assigned the request a case control number of F-2015-03180. The Department made two productions of responsive documents before this lawsuit was filed. The first production occurred on March 23, 2016, and the second occurred on June 13, 2016. The Department also referred a single document to the Defense Intelligence Agency, which replied on June 28, 2017, denying in full the document's release.

After this lawsuit was filed, the Department informed you in August 2017 that the search for responsive documents had located a large number of potentially responsive documents. The parties agreed that the Department could further narrow the results of these searches—and reduce

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the number of documents that needed to be processed—by applying certain additional keywords to the initial search results.

The additional keywords included: “offset*,” “contract*,” “agreement*,” “censor*,” “Al Jazeera,” “request for Proposal*,” “intelligence,” “boeing,” “natural gas,” “optics,” “RFP,” “sales,” “weapons,” “train*,” “Bienen,” “Dennis,” “arrest,” “jail,” “image,” “general dynamics,” and “caterpillar.”

After applying the keywords, the Department made ten additional productions of responsive documents, by letters dated June 9, 2017; July 7, 2017; August 7, 2017, September 6, 2017; October 5, 2017; November 6, 2017; December 5, 2017; January 4, 2018; February 5, 2018; and May 17, 2018.

II. Request F-2015-03181

You submitted the following FOIA request to the Department on February 11, 2015:

[A]ll *policy and planning materials* pertaining to *establishing U.S. university campuses in Qatar, Abu Dhabi, South Korea, China, and Singapore.

The timeframe of the request was January 1, 2003, to present.

The Department assigned the request a case control number of F-2015-03181.

On December 5, 2017, the Department informed you that it had completed its search and found no responsive records.

III. Request F-2015-03575

You submitted a FOIA request to the Department on February 18, 2015, seeking documents maintained by either the U.S. Agency International Development (USAID) and its components, or the Middle East Partnership Initiative (MEPI) and its components, concerning government funds transferred to the Independent Center of Journalists, Northwestern University and its components, and the Center(s) for Journalism Excellence.

The Department assigned the request a case control number of F-2015-03575.

After this lawsuit was filed, you acknowledged that the request for documents generated by USAID needed to be directed to USAID, and you agreed to narrow the request to the following:

- 1) All contracts, memoranda, reports, notes, email, documents/correspondence sent to and from USAID and any other material in any medium produced, received or maintained by the Middle East Partnership Initiative and its components from January 1, 2004 to present concerning U.S. Government funds transferred to the Independent Center of Journalists.

- 2) All contracts, memoranda, reports, notes, email, documents/correspondence sent to and from USAID or any other material in any medium produced, received or maintained by the Middle East Partnership Initiative and its components from January 1, 2004 to present concerning Northwestern University and its components, including but not limited to the Medill School of Journalism.
- 3) All contracts, memoranda, reports, notes, email, documents/correspondence sent to and from USAID and any other material in any medium produced, received or maintained by the Middle East Partnership Initiative and its components from January 1, 2004 to present concerning Center(s) of Journalism Excellence.

The Department made four productions of responsive documents, by letters dated June 9, 2017; July 7, 2017; January 4, 2018; and May 17, 2018.

IV. The Search Process for Request F-2015-03180

After reviewing your requests and consulting with several offices and bureaus within the Department, the Department determined that the following offices or records systems were reasonably likely to have documents responsive to request F-2015-03180:

The State Archiving System, the Retired Records Inventory Management System, the U.S. Embassy in Doha, the Bureau of Diplomatic Security, the Bureau of Near Eastern Affairs, the Bureau of International Information Programs, the Policy and Planning Staff, and the Office of the Undersecretary for Management.

The **State Archiving System** gives the Department the ability to query over 40 million records through a single interface. These records include documents that discuss or define foreign policy, set precedents, or require action or use by more than one office. The system provides search capability and access to (a) the official record copies of almost all incoming and outgoing cables between the Department and Foreign Service posts; (b) diplomatic notes; (c) correspondence to and from the White House, members of Congress, and other federal agencies; (d) position papers and reports; (e) memoranda of conversations; (f) interoffice memoranda; and (g) retired permanent records maintained in the electronic Records Service Center. The system generally allows the Department to conduct full-text searches of records. For documents that are not full-text searchable, such as older correspondence, the system searches the text of a customized reference index that directs the person searching to a full copy of the document. Here, a Department specialist knowledgeable of both the system and the request conducted a search using the term "Northwestern." The search returned 25 responsive documents.

The **Retired Records Inventory Management System** is a searchable database that automates the processing of records that have been retired to the Records Service Center and tracks

the status of all boxes received at the Records Service Center from receipt to disposition. A Department specialist can search the full text of the retired file manifests, as well as any metadata in the system's database. The retired file manifests serve as an index of the contents of retired paper and electronic files and are used to direct a researcher to particular file folders or documents in retired files. Occasionally, a manifest does not contain sufficient detail to indicate the exact contents. In that scenario, if potentially responsive files are identified, the file(s) or box(es) must be retrieved for a more detailed manual inspection. Here, a Department specialist knowledgeable of both the system and the request conducted a search using the term "Northwestern." No responsive records were identified.

U.S. Embassies and Consulates generally conduct activities aimed at promoting U.S. foreign policy objectives and protecting U.S. interests and U.S. citizens living abroad. These embassies and consulates employ Foreign Service Officers and Specialists, as well as local staff. Each embassy and consulate has unique staffing patterns and record management systems. Every person who conducts a search of a relevant U.S. embassy or consulate is knowledgeable about the relevant record management system. Here, at the **U.S. Embassy in Doha, Qatar**, an Information Management Officer knowledgeable of both the record management system and the request searched the electronic unclassified and classified email records of employees in the Public Affairs Section, Economic Section, and Political Section using the term "Northwestern." He also searched the Embassy's shared drives and all print and exchange servers using the term "Northwestern." No date restrictions were applied to these searches. After applying the additional keywords you provided, the search yielded 396 responsive documents.

The **Bureau of Diplomatic Security** is responsible for providing a safe and secure environment for the conduct of U.S. foreign policy. Every U.S. diplomatic mission operates under a security program designed and maintained by the Bureau. The Bureau's Freedom of Information and Privacy Act Office reviews all incoming FOIA requests, determines which components are reasonably likely to have responsive records, and tasks those components with searching for responsive records. Here, the Bureau identified two components as reasonably likely to have responsive records: the Overseas Security Advisory Council and the Office of the Executive Director's Office of Management. A policy analyst knowledgeable of both the relevant record management systems and the request conducted a search of the unclassified and classified network shared drives at the Overseas Security Advisory Council and the Office of Management, using the search terms "Northwestern" or "University." The search of the Overseas Security Advisory Council was limited to January 2010 (the earliest date that records were available) to the date of the search. The search of the Office of Management was not date-restricted. The searches retrieved no responsive documents.

The **Bureau of Near Eastern Affairs** is charged with advising the Secretary of State on matters in North Africa and the Middle East. Within the Bureau, the Office of Arabian Peninsula Affairs is responsible for assisting and promoting diplomatic issues associated with Bahrain, Kuwait, Oman, Qatar, Saudi Arabia, the United Arab Emirates, and Yemen. Here, a special adviser responsible for Qatari affairs at the Office of Arabian Peninsula Affairs, who was knowledgeable of the relevant record systems and the request, searched his unclassified and classified email records and the Office's network shared drive using the term "Northwestern University." The search was limited to January 1, 2003, through the date of the search. After applying the additional keywords you provided, the search returned no responsive records.

The **Bureau of International Information Programs** provides the Department with a worldwide outreach platform for public diplomacy. The Bureau partners with policy experts and missions abroad to design and execute programs to engage foreign audiences to advance U.S. foreign policy. Here, a special adviser in the Bureau who was knowledgeable of both the relevant records systems and the request conducted a search of his unclassified email records, cloud-based platforms, and the Bureau's network shared drive using the term "Northwestern University." The search was limited to January 1, 2005 through the date of the search. Within the Bureau, the Office of the U.S. Speaker Program works to arrange in-country and virtual programs to enable more than 600 American experts to engage foreign audiences directly on U.S. foreign policy priorities. The Office's director, who was knowledgeable of the Office's record systems and the request, conducted a search of her unclassified email records and the Office's shared database using the terms "Qatar," "Doha," "Northwestern," "Film," or "Richard Pena." The search was limited to January 1, 2005, through the date of the search. After applying the additional keywords you provided, the searches returned no responsive records.

The **Policy Planning Staff** office serves as a source of independent policy analysis and advice for the Secretary of State. The office's mission is to take a longer-term, strategic view of global trends and to frame recommendations for the Secretary to advance U.S. interests and American values. An employee knowledgeable of the office's record systems and the request conducted a search of the office's unclassified and classified network shared drives using the following search terms: "Northwestern," "University," "Campus," "Qatar," or "Doha." The search was limited to January 1, 2005, through the date of the search. The search returned no responsive records.

The **Office of the Undersecretary for Management** oversees the activities of ten bureaus and offices that are responsible for management-improvement initiatives, security, the Department's information technology infrastructure, support services for domestic and overseas operations, consular affairs, and personnel matters (including recruitment, career development, training, medical services, and retirement programs). The Undersecretary for Management, who was knowledgeable of the office's records systems and the request, conducted a search of unclassified state.gov email records and Everest¹ using the term "Northwestern." The search was limited to December 19, 2005, through June 28, 2015. The search returned no responsive records.

The Department also contacted the following offices and bureaus, all of which confirmed that they were not reasonably likely to maintain records responsive to the request because the topic of the request was not within the scope of their work:

- The Policy, Planning, and Resources Office of the Office of the Undersecretary for Public Diplomacy
- The Office of the Chief of Protocol
- The Bureau of Intelligence and Research

¹ Everest is a Microsoft SharePoint based enterprise system used to task, track, control, and archive documents containing substantive foreign policy information passing to, from, and through the offices of the Secretary of State, the Deputy Secretaries of State, and other Department principal officers. The documents in Everest are full-text searchable.

- The Office of Overseas Schools in the Bureau of Administration
- The Office of Language Services in the Bureau of Administration
- The White House Liaison's Office, which reports to the Office of the Undersecretary for Management
- The Office of Management Policy, Rightsizing, and Innovation, which reports to the Office of the Undersecretary for Management
- The Bureau of Budget and Planning, which reports to the Office of the Undersecretary for Management
- The Bureau of the Comptroller and Global Financial Services, which reports to the Office of the Undersecretary for Management
- The Bureau of Educational and Cultural Affairs

(In the Department's letter to you dated March 23, 2016, the Department incorrectly wrote that it had conducted searches of the Bureau of Budget and Planning, the Bureau of Educational and Cultural Affairs, and the Office of the Comptroller and Global Financial Services. In fact, these offices had not conducted searches; they had confirmed to the Department that they were not reasonably likely to have records responsive to the request.)

V. The Search Process for Request F-2015-03181

After reviewing your requests and consulting with several offices and bureaus within the Department, the Department determined that the following offices or records systems were reasonably likely to have documents responsive to Request F-2015-03181:

The State Archiving System, the Retired Records Inventory Management System, the Bureau of Diplomatic Security, the U.S. Embassy in Doha, the U.S. Embassy in Abu Dhabi, the U.S. Embassy in Beijing, the U.S. Consulate in Shanghai, the U.S. Embassy in Seoul, the U.S. Embassy in Singapore, the Bureau of East Asian and Pacific Affairs, and the Bureau of Near Eastern Affairs.

The **State Archiving System** gives the Department the ability to query over 40 million records through a single interface. These records include documents that discuss or define foreign policy, set precedents, or require action or use by more than one office. The system provides search capability and access to (a) the official record copies of almost all incoming and outgoing cables between the Department and Foreign Service posts; (b) diplomatic notes; (c) correspondence to and from the White House, members of Congress, and other federal agencies; (d) position papers and reports; (e) memoranda of conversations; (f) interoffice memoranda; and (g) retired permanent records maintained in the electronic Records Service Center. The system generally allows the Department to conduct full-text searches of records. For documents that are not full-text searchable, such as older correspondence, the system searches the text of a customized reference index that directs the person searching to a full copy of the document. Here, a specialist knowledgeable of the system and the request conducted searches using the following terms or combinations of terms and returned no responsive records:

- “Abu Dhabi” and “University”
- “New York University”
- “University” and “Singapore”
- “Wharton”
- “University of Chicago”
- “Stanford”
- “Georgia Tech”
- “Johns Hopkins”
- “MIT”
- “Duke”
- “Qatar” and “University”
- “Weill”
- “Cornell Medical College”
- “Texas A&M”
- “Carnegie Mellon University”
- “Georgetown”
- “Education City” and “Qatar”
- “Northwestern”
- “SUNY Korea”
- “George Mason Korea”
- “University of Utah” w/2 “Asia”
- “Wenzhou-Kean”
- “Duke” w/2 “Kunshan”
- “NYU-Shanghai”
- “New York University” w/2 “Shanghai”
- “Hopkins w/2 “Nanjing”
- “University of Chicago” w/2 “Shanghai”
- “Savannah College” w/2 “Hong Kong”

The **Retired Records Inventory Management System** is a searchable database that automates the processing of records that have been retired to the Records Service Center and tracks the status of all boxes received at the Records Service Center from receipt to disposition. A Department specialist can search the full text of the retired file manifests, as well as any metadata in the system’s database. The retired file manifests serve as an index of the contents of retired paper and electronic files and are used to direct a researcher to particular file folders or documents in retired files. Occasionally, a manifest does not contain sufficient detail to indicate the exact contents. In that scenario, if potentially responsive files are identified, the file(s) or box(es) must be retrieved for a more detailed manual inspection. Here, a specialist knowledgeable of the system and the request conducted a search using the following terms or combinations of terms and returned no responsive records:

- “Abu Dhabi” and “University”
- “New York University”
- “University” and “Singapore”
- “Wharton”

- “University of Chicago”
- “Stanford”
- “Georgia Tech”
- “Johns Hopkins”
- “MIT”
- “Duke”
- “Qatar” and “University”
- “Weill”
- “Cornell Medical College”
- “Texas A&M”
- “Carnegie Mellon University”
- “Georgetown”
- “Education City” and “Qatar”
- “Northwestern”
- “SUNY Korea”
- “George Mason Korea”
- “University of Utah” and “Asia”
- “Wenzhou-Kean”
- “Duke” and “Kunshan”
- “NYU-Shanghai”
- “New York University” and “Shanghai”
- “Hopkins” and “Nanjing”
- “University of Chicago” and “Shanghai”
- “Savannah College” and “Hong Kong”

The **Bureau of Diplomatic Security** is responsible for providing a safe and secure environment for the conduct of U.S. foreign policy. Every U.S. diplomatic mission operates under a security program designed and maintained by the Bureau. The Bureau’s Freedom of Information and Privacy Act Office reviews all incoming FOIA requests, determines which components are reasonably likely to have responsive records, and tasks those components with searching for responsive records. Here, a policy analyst knowledgeable of both the relevant record management systems and the request conducted a search of the unclassified and classified shared drives at the Bureau’s Office of Management’s Policy and Planning Division using the search terms (“University” or “College Campus Overseas”) and (“Creation” or “Establishment” or “Setup” or “Assistance”). The search was limited to January 2003 through the date of the search. The search returned no responsive records. Similarly, a foreign affairs officer knowledgeable of the relevant record management systems and the request conducted a search of the unclassified and classified shared drives of the Bureau’s Overseas Advisory Council using the search terms (“Education City” or “Qatar Foundation” or “Abu Dhabi” or “Singapore”) and (“University” or “College Campus”). The officer also conducted searches using the terms “Assistance” and “University.” The search was limited January 2010 (the earliest date that records were available) through the date of the search. The search returned no responsive records.

At the **U.S. Embassy in Doha, Qatar**, an information management officer knowledgeable of the embassy’s records systems and the request searched the unclassified and classified email

records of employees in the Public Affairs Section, Economic Section, and Political Section, as well as the embassy's shared drives and print and exchange servers, using the terms "Education City" or "Qatar Foundation." No date restrictions were applied. The search returned no responsive records.

At the **U.S. Embassy in Abu Dhabi, United Arab Emirates**, a cultural affairs officer and a cultural specialist who were both knowledgeable of the embassy's records systems and the request searched their unclassified email records, shared drives, and paper files of the embassy's Public Affairs and Public Diplomacy Sections (which is where educational and cultural matters are handled) using the terms "University," "U.S. University," "Branch Campus," "Education City," or "Campus." The search was restricted to January 1, 2013 (the earliest date records were available), through the date of the search. The search returned no responsive records.

At the **U.S. Embassy in Beijing, China**, an information systems officer and an office management specialist who both were knowledgeable of the embassy's record systems and the request, searched the paper files of the Public Affairs Officers, Education Officer, and Grant Files; the unclassified email and .pst files of the Senior Cultural Affairs Officer, Public Affairs Officer, and Educational Officer; and the shared drives of the Public Affairs Section, Economic Section, Political Section, and Executive Office using the following terms, with the search being restricted to January 1, 2003, through the date of the search, and returned no responsive records:

- "Kean University"
- "Wenzhou-Kean"
- "Duke University"
- "Duke-Kunshan"
- "NYU-Shanghai"
- "New York University"
- "Hopkins-Nanjing"
- "University of Chicago"
- "Savannah College"

At the **U.S. Consulate in Shanghai, China**, an information management specialist, an acting cultural affairs officer, and a program assistant, all of whom were knowledgeable of the consulate's records systems and the request, conducted searches of their unclassified email records and the shared drives of the consulate's Public Affairs Section, Economic Section, Political Section, and Executive Office using the following search terms, and returned no responsive records:

- "Kean University"
- "Wenzhou-Kean"
- "Duke University"
- "Duke-Kunshan"
- "NYU-Shanghai"
- "New York University"
- "Hopkins-Nanjing"

At the **U.S. Embassy in Seoul, South Korea**, the Public Affairs Section's cultural affairs officer, who was knowledgeable of the embassy's records systems and the request, conducted searches of his unclassified email records and the Section's shared drive using the search terms "Songdo," "SUNY Korea," "George Mason Korea," or "Utah Asia." No date restriction was applied to the shared drive search, but the email search was limited to June 1, 2015 (when the officer arrived at the embassy) through the date of the search. No paper records were searched because they would have been captured in an electronic search. The search returned no responsive records.

At the **U.S. Embassy in Singapore**, an information management officer, who was knowledgeable of the embassy's records systems and the request, conducted searches of the paper files, unclassified email records, and shared drives of the Public Affairs Section, Economic Section, Political Section, and Executive Office using the search terms ("College" or "University") and ("Establish" or "Assistance" or "Agreement") and "Campus" and "Singapore." The search returned no responsive records.

The **Bureau of East Asian and Pacific Affairs** advises the Secretary of State on U.S. foreign policy and U.S. relations with countries in the Asia-Pacific region. Within the Bureau, the Office of Korean Affairs manages U.S. foreign policy regarding the Republic of Korea and the Democratic People's Republic of Korea. The office's deputy director, who was knowledgeable of the office's records systems and the request, conducted a search of the office's network shared drive using the search term "University." The search was limited to January 1, 2000, through the date of the search. No paper files were searched because all records are maintained electronically. The search returned no responsive records. Similarly, an officer in the Office of Maritime of Southeast Asia who was knowledgeable of that office's records systems and the request conducted a search of her unclassified and classified email records and the office's unclassified and classified shared drives using the search term "University." The email search was limited to January 1, 2017 (when the officer began employment) through the date of the search; the shared drives search was limited to January 1, 2003, through the date of the search. The search returned no responsive records.

The **Bureau of Near Eastern Affairs** is charged with advising the Secretary of State on matters in North Africa and the Middle East. Within the Bureau, the Office of Arabian Peninsula Affairs is responsible for assisting and promoting diplomatic issues associated with Bahrain, Kuwait, Oman, Qatar, Saudi Arabia, the United Arab Emirates, and Yemen. Here, a desk officer in the Office of Arabian Peninsula Affairs who was knowledgeable of both the office's record systems and the request searched her unclassified and classified email records, the office's paper files, and the office's shared drive using the search terms ("University" and "Abu Dhabi") or ("Campus" and "Abu Dhabi"). The search was limited to January 1, 2003, through the date of the search. The search returned no responsive records.

The Department also contacted the following offices and bureaus, all of which confirmed that they were not reasonably likely to maintain records responsive to the request because the topic of the request was not within the scope of their work:

- The Policy, Planning, and Resources Office of the Office of the Undersecretary for Public Diplomacy
- The Office of the Chief of Protocol
- The Bureau of Intelligence and Research
- The Office of Overseas Schools in the Bureau of Administration
- The Office of Language Services in the Bureau of Administration
- The White House Liaison's Office, which reports to the Office of the Undersecretary for Management
- The Bureau of Budget and Planning, which reports to the Office of the Undersecretary for Management
- The Bureau of International Information Programs
- The Bureau of Educational and Cultural Affairs
- The Office of Policy Planning Staff in the Office of the Secretary

VI. The Search Process for Request F-2015-03575

After reviewing your requests and consulting with several offices and bureaus within the Department, the Department determined that the following offices or records systems were reasonably likely to have documents responsive to request F-2015-03575:

The Retired Records Inventory Management System, and the Bureau of Near Eastern Affairs in which the Middle Eastern Partnership Initiative is located.

The **Retired Records Inventory Management System** is a searchable database that automates the processing of records that have been retired to the Records Service Center and tracks the status of all boxes received at the Records Service Center from receipt to disposition. A Department specialist can search the full text of the retired file manifests, as well as any metadata in the system's database. The retired file manifests serve as an index of the contents of retired paper and electronic files and are used to direct a researcher to particular file folders or documents in retired files. Occasionally, a manifest does not contain sufficient detail to indicate the exact contents. In that scenario, if potentially responsive files are identified, the file(s) or box(es) must be retrieved for a more detailed manual inspection. Here, a Department specialist knowledgeable of both the system and the request conducted a search using the terms "MEPI," "Northwestern," "Medill," "Center of Journalism Excellence," or "Independent Center of Journalists." The search returned no responsive records.

The **Bureau of Near Eastern Affairs**, Office of Assistance Coordination, was created in 2014 to coordinate and align U.S. assistance in the Middle East and Africa with U.S. foreign policy priorities and regional economic, security, governance, and stabilization needs. The Office also directly programs and oversees critical projects across the region. The Office houses the Middle Eastern Partnership Initiative. Office staff are also assigned to two regional Middle Eastern Partnership Initiative offices at the U.S. embassies in Kuwait and Rabat, to program and oversee \$9 million in annual grants to local civil-society organizations. Award documents from the Office are stored on the Office's shared drives and a system called the Assistance Coordination Performance Reporting System. Here, a grants management specialist knowledgeable of these

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records systems and the request conducted searches of the relevant Program Officer's email records, the Office's network shared drive, and the Assistance Coordination Performance Reporting System using the search terms "Northwestern," "Medill," or "Independent Center of Journalists." The specialist also searched the Office's network shared drive and the Assistance Coordination Performance Reporting System using the search terms "Center of Journalism Excellence," "Center," or "Journalism." The search was limited to January 1, 2003, through the date of the search. The searched located 33 responsive documents.

VII. The Search Beginning in December 2018

In December 2018, in response to one of the arguments in your brief in response to the Department's motion for summary judgment, specifically the argument about the email records of the U.S. Ambassador to Qatar (Dana Shell Smith), the Department initiated another records search in the hope of resolving the issue without the need for the court's intervention. The Department conducted a search of the ambassador's archived classified and unclassified emails using the keyword "Northwestern." The search was limited to August 20, 2015, the date of her earliest archived emails, through July 1, 2017, the date by which her tenure with the Department ended. The Department's review of the potentially responsive records was delayed by the five-week government shutdown, but the Department anticipates making an initial production of responsive records on March 5, 2019, with a supplemental production to follow by April 5, 2019.

Sincerely,

JOHN R. LAUSCH, Jr.
United States Attorney

By: s/ Alex Hartzler

ALEX HARTZLER
Assistant United States Attorney