



U.S. Department of Justice

Federal Bureau of Investigation
Washington, D.C. 20535

November 23, 2020

MR. JOHN GREENEWALD JR.
SUITE 1203
27305 WEST LIVE OAK ROAD
CASTAIC, CA 91384-4520

FOIPA Request No.: 1385180-000
Subject: Torres Advanced Enterprise Solutions

Dear Mr. Greenewald:

The enclosed documents were reviewed under the Freedom of Information/Privacy Acts (FOIPA), Title 5, United States Code, Section 552/552a. Below you will find check boxes under the appropriate statute headings which indicate the types of exemptions asserted to protect information which is exempt from disclosure. The appropriate exemptions are noted on the enclosed pages next to redacted information. In addition, a deleted page information sheet was inserted to indicate where pages were withheld entirely and identify which exemptions were applied. The checked exemption boxes used to withhold information are further explained in the enclosed Explanation of Exemptions.

Section 552

☐ (b)(1)

☐ (b)(2)

☐ (b)(3)

☐ (b)(4)

☐ (b)(5)

☒ (b)(6)

☐ (b)(7)(A)

☐ (b)(7)(B)

☒ (b)(7)(C)

☒ (b)(7)(D)

☒ (b)(7)(E)

☐ (b)(7)(F)

☐ (b)(8)

☐ (b)(9)

Section 552a

☐ (d)(5)

☐ (j)(2)

☐ (k)(1)

☐ (k)(2)

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☐ (k)(4)

☐ (k)(5)

☐ (k)(6)

☐ (k)(7)

497 pages were reviewed and 61 pages are being released.

Please see the paragraphs below for relevant information specific to your request as well as the enclosed FBI FOIPA Addendum for standard responses applicable to all requests.

- ☒ Document(s) were located which originated with, or contained information concerning, other Government Agency (ies) [OGA].
- ☒ This information has been referred to the OGA(s) for review and direct response to you.
- ☒ We are consulting with another agency. The FBI will correspond with you regarding this information when the consultation is completed.

Please refer to the enclosed FBI FOIPA Addendum for additional standard responses applicable to your request. "Part 1" of the Addendum includes standard responses that apply to all requests. "Part 2" includes additional standard responses that apply to all requests for records about yourself or any third party individuals. "Part 3" includes general information about FBI records that you may find useful. Also enclosed is our Explanation of Exemptions.

For questions regarding our determinations, visit the www.fbi.gov/foia website under "Contact Us." The FOIPA Request Number listed above has been assigned to your request. Please use this number in all correspondence concerning your request.

If you are not satisfied with the Federal Bureau of Investigation's determination in response to this request, you may administratively appeal by writing to the Director, Office of Information Policy (OIP), United States Department of Justice, 441 G Street, NW, 6th Floor, Washington, D.C. 20530, or you may submit an appeal through OIP's FOIA STAR portal by creating an account following the instructions on OIP's website: <https://www.justice.gov/oip/submit-and-track-request-or-appeal>. Your appeal must be postmarked or electronically transmitted within ninety (90) days of the date of my response to your request. If you submit your appeal by mail, both the letter and the envelope should be clearly marked "Freedom of Information Act Appeal." Please cite the FOIPA Request Number assigned to your request so it may be easily identified.

You may seek dispute resolution services by contacting the Office of Government Information Services (OGIS). The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, e-mail at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769. Alternatively, you may contact the FBI's FOIA Public Liaison by emailing foipaquestions@fbi.gov. If you submit your dispute resolution correspondence by email, the subject heading should clearly state "Dispute Resolution Services." Please also cite the FOIPA Request Number assigned to your request so it may be easily identified.



See additional information which follows.

The enclosed documents represent the first interim release of information responsive to your Freedom of Information/Privacy Acts (FOIPA) request.

This release is being provided to you free of charge.

Duplicate copies of the same document were not processed.

As previously indicated, document(s) were located which originated with, or contained information concerning another agency (ies). We are consulting with the other agency (ies) and are awaiting their response. Our office has processed all other information currently in our possession. The FBI will correspond with you regarding those documents when the consultation is completed.

Inquiries regarding your OGA referral(s) designated within the release as "Referral/Direct" may be directed to the following agency(ies) at:

Office of Information Programs and Services
A/GIS/IPS
U.S. Department of State
HST Room B266
2201 C Street, NW
Washington, DC 20520

Sincerely,



Michael G. Seidel
Section Chief
Record/Information
Dissemination Section
Information Management Division

Enclosure(s)

FBI FOIPA Addendum

As referenced in our letter responding to your Freedom of Information/Privacy Acts (FOIPA) request, the FBI FOIPA Addendum provides information applicable to your request. Part 1 of the Addendum includes standard responses that apply to all requests. Part 2 includes standard responses that apply to requests for records about individuals to the extent your request seeks the listed information. Part 3 includes general information about FBI records, searches, and programs.

Part 1: The standard responses below apply to all requests:

- (i) **5 U.S.C. § 552(c).** Congress excluded three categories of law enforcement and national security records from the requirements of the FOIPA [5 U.S.C. § 552(c)]. FBI responses are limited to those records subject to the requirements of the FOIPA. Additional information about the FBI and the FOIPA can be found on the www.fbi.gov/foia website.
- (ii) **Intelligence Records.** To the extent your request seeks records of intelligence sources, methods, or activities, the FBI can neither confirm nor deny the existence of records pursuant to FOIA exemptions (b)(1), (b)(3), and as applicable to requests for records about individuals, PA exemption (j)(2) [5 U.S.C. §§ 552/552a (b)(1), (b)(3), and (j)(2)]. The mere acknowledgment of the existence or nonexistence of such records is itself a classified fact protected by FOIA exemption (b)(1) and/or would reveal intelligence sources, methods, or activities protected by exemption (b)(3) [50 USC § 3024(i)(1)]. This is a standard response and should not be read to indicate that any such records do or do not exist.

Part 2: The standard responses below apply to all requests for records on individuals:

- (i) **Requests for Records about any Individual—Watch Lists.** The FBI can neither confirm nor deny the existence of any individual's name on a watch list pursuant to FOIA exemption (b)(7)(E) and PA exemption (j)(2) [5 U.S.C. §§ 552/552a (b)(7)(E), (j)(2)]. This is a standard response and should not be read to indicate that watch list records do or do not exist.
- (ii) **Requests for Records about any Individual—Witness Security Program Records.** The FBI can neither confirm nor deny the existence of records which could identify any participant in the Witness Security Program pursuant to FOIA exemption (b)(3) and PA exemption (j)(2) [5 U.S.C. §§ 552/552a (b)(3), 18 U.S.C. 3521, and (j)(2)]. This is a standard response and should not be read to indicate that such records do or do not exist.
- (iii) **Requests for Records for Incarcerated Individuals.** The FBI can neither confirm nor deny the existence of records which could reasonably be expected to endanger the life or physical safety of any incarcerated individual pursuant to FOIA exemptions (b)(7)(E), (b)(7)(F), and PA exemption (j)(2) [5 U.S.C. §§ 552/552a (b)(7)(E), (b)(7)(F), and (j)(2)]. This is a standard response and should not be read to indicate that such records do or do not exist.

Part 3: General Information:

- (i) **Record Searches.** The Record/Information Dissemination Section (RIDS) searches for reasonably described records by searching systems or locations where responsive records would reasonably be found. A standard search normally consists of a search for main files in the Central Records System (CRS), an extensive system of records consisting of applicant, investigative, intelligence, personnel, administrative, and general files compiled by the FBI per its law enforcement, intelligence, and administrative functions. The CRS spans the entire FBI organization, comprising records of FBI Headquarters, FBI Field Offices, and FBI Legal Attaché Offices (Legats) worldwide; Electronic Surveillance (ELSUR) records are included in the CRS. Unless specifically requested, a standard search does not include references, administrative records of previous FOIPA requests, or civil litigation files. For additional information about our record searches, visit www.fbi.gov/services/information-management/foipa/requesting-fbi-records.
- (ii) **FBI Records.** Founded in 1908, the FBI carries out a dual law enforcement and national security mission. As part of this dual mission, the FBI creates and maintains records on various subjects; however, the FBI does not maintain records on every person, subject, or entity.
- (iii) **Requests for Criminal History Records or Rap Sheets.** The Criminal Justice Information Services (CJIS) Division provides Identity History Summary Checks – often referred to as a criminal history record or rap sheet. These criminal history records are not the same as material in an investigative “FBI file.” An Identity History Summary Check is a listing of information taken from fingerprint cards and documents submitted to the FBI in connection with arrests, federal employment, naturalization, or military service. For a fee, individuals can request a copy of their Identity History Summary Check. Forms and directions can be accessed at www.fbi.gov/about-us/cjis/identity-history-summary-checks. Additionally, requests can be submitted electronically at www.edo.cjis.gov. For additional information, please contact CJIS directly at (304) 625-5590.
- (iv) **National Name Check Program (NNCP).** The mission of NNCP is to analyze and report information in response to name check requests received from federal agencies, for the purpose of protecting the United States from foreign and domestic threats to national security. Please be advised that this is a service provided to other federal agencies. Private Citizens cannot request a name check.

EXPLANATION OF EXEMPTIONS

SUBSECTIONS OF TITLE 5, UNITED STATES CODE, SECTION 552

- (b)(1) (A) specifically authorized under criteria established by an Executive order to be kept secret in the interest of national defense or foreign policy and (B) are in fact properly classified to such Executive order;
- (b)(2) related solely to the internal personnel rules and practices of an agency;
- (b)(3) specifically exempted from disclosure by statute (other than section 552b of this title), provided that such statute (A) requires that the matters be withheld from the public in such a manner as to leave no discretion on issue, or (B) establishes particular criteria for withholding or refers to particular types of matters to be withheld;
- (b)(4) trade secrets and commercial or financial information obtained from a person and privileged or confidential;
- (b)(5) inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than an agency in litigation with the agency;
- (b)(6) personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy;
- (b)(7) records or information compiled for law enforcement purposes, but only to the extent that the production of such law enforcement records or information (A) could reasonably be expected to interfere with enforcement proceedings, (B) would deprive a person of a right to a fair trial or an impartial adjudication, (C) could reasonably be expected to constitute an unwarranted invasion of personal privacy, (D) could reasonably be expected to disclose the identity of confidential source, including a State, local, or foreign agency or authority or any private institution which furnished information on a confidential basis, and, in the case of record or information compiled by a criminal law enforcement authority in the course of a criminal investigation, or by an agency conducting a lawful national security intelligence investigation, information furnished by a confidential source, (E) would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law, or (F) could reasonably be expected to endanger the life or physical safety of any individual;
- (b)(8) contained in or related to examination, operating, or condition reports prepared by, on behalf of, or for the use of an agency responsible for the regulation or supervision of financial institutions; or
- (b)(9) geological and geophysical information and data, including maps, concerning wells.

SUBSECTIONS OF TITLE 5, UNITED STATES CODE, SECTION 552a

- (d)(5) information compiled in reasonable anticipation of a civil action proceeding;
- (j)(2) material reporting investigative efforts pertaining to the enforcement of criminal law including efforts to prevent, control, or reduce crime or apprehend criminals;
- (k)(1) information which is currently and properly classified pursuant to an Executive order in the interest of the national defense or foreign policy, for example, information involving intelligence sources or methods;
- (k)(2) investigatory material compiled for law enforcement purposes, other than criminal, which did not result in loss of a right, benefit or privilege under Federal programs, or which would identify a source who furnished information pursuant to a promise that his/her identity would be held in confidence;
- (k)(3) material maintained in connection with providing protective services to the President of the United States or any other individual pursuant to the authority of Title 18, United States Code, Section 3056;
- (k)(4) required by statute to be maintained and used solely as statistical records;
- (k)(5) investigatory material compiled solely for the purpose of determining suitability, eligibility, or qualifications for Federal civilian employment or for access to classified information, the disclosure of which would reveal the identity of the person who furnished information pursuant to a promise that his/her identity would be held in confidence;
- (k)(6) testing or examination material used to determine individual qualifications for appointment or promotion in Federal Government service the release of which would compromise the testing or examination process;
- (k)(7) material used to determine potential for promotion in the armed services, the disclosure of which would reveal the identity of the person who furnished the material pursuant to a promise that his/her identity would be held in confidence.

This document is made available through the declassification efforts
and research of John Greenewald, Jr., creator of:

The Black Vault



The Black Vault is the largest online Freedom of Information Act (FOIA) document clearinghouse in the world. The research efforts here are responsible for the declassification of hundreds of thousands of pages released by the U.S. Government & Military.

Discover the Truth at: **<http://www.theblackvault.com>**

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DELETED PAGE INFORMATION SHEET
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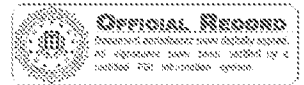
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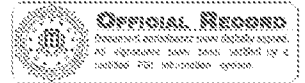
FEDERAL BUREAU OF INVESTIGATION

Date of entry 01/20/2015 (Protect Identity), Date of Birth cellular telephone number was interviewedb6
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Torres Advanced Enterprise Solutions (TORRES AES) was an international company with offices in the Middle East, Europe, Africa, Asia and throughout the Americas.

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b7DInvestigation on 01/16/2015 at File # 345-HQ-1662769Date drafted 01/18/2015by b6
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**FEDERAL BUREAU OF INVESTIGATION****Electronic Communication**

Title: (U) [redacted] Interview

Date: 01/22/2015

CC: [redacted]

From: [redacted]

Contact: [redacted]

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: [redacted]

Synopsis: (U) To document interview of [redacted] regarding International Corruption.

Details:

On 1/9/15, A/CID ALAT [redacted] met with [redacted] dob [redacted] and Attorney [redacted] previously sent an email to [redacted]

[redacted]

[redacted]

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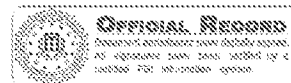
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Title: (U) [REDACTED] Interview
Re: [REDACTED] 01/22/2015

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UNCLASSIFIED//~~FOUO~~**FEDERAL BUREAU OF INVESTIGATION****Electronic Communication**

Title: (U//~~FOUO~~) DOJ authorization for FCPA investigation

Date: 03/03/2015

From: CRIMINAL INVESTIGATIVE

D6-ICU

Contact: [REDACTED]

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Approved By: [REDACTED]

Drafted By: [REDACTED]

Case ID #: 205-HQ-6117076

(U) [REDACTED]

Torres Advanced Enterprise Solutions;
FCPA

Synopsis: (U//~~FOUO~~) DOJ authorization for FCPA investigation

Full Investigation Initiated: 02/10/2015

Enclosure(s): Enclosed are the following items:

1. (U//~~FOUO~~) [REDACTED].pdf

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Details:

On 03/02/2015, [REDACTED] Deputy Chief, FCPA Unit, Fraud Section, Criminal Division, U.S. Department of Justice, provided authorization to further investigate captioned matter for FCPA violations.

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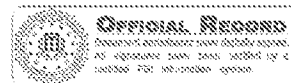
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[redacted] (CID) (FBI)

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From: [redacted]
Sent: Monday, March 02, 2015 8:22 PM
To: [redacted] (CID) (FBI)
Subject: RE: Torres AES

Is an email sufficient for you to open the case? If so, consider this approved for opening. Once we know a little more detail, I'll decide whether to assign the case. Thanks.

UNCLASSIFIED//~~FOUO~~**FEDERAL BUREAU OF INVESTIGATION****Dissemination of Information to Other Agencies**

Title: (U//~~FOUO~~) Documents Provided to Department
of State OIG

Date: 03/12/2015

Approved By: [REDACTED]

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Drafted By: [REDACTED]

Case ID #: 205-HQ-6117076

(U) [REDACTED]

Torres Advanced Enterprise Solutions;
FCPA

Full Investigation Initiated: 02/10/2015

Responsible Organization: CRIMINAL INVESTIGATIVE

Agency Contacted: U.S. Department of State on 03/10/2015 via In
Person

POC: Assistant Special Agent in Charge [REDACTED]

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Work: [REDACTED]

E-mail: [REDACTED]

Disseminated On: 03/10/2015 (Ongoing)

Dissemination Details: (U//~~FOUO~~) Reporting related to this
investigation. This is a joint investigation and dissemination will be
on-going.

Method: Written

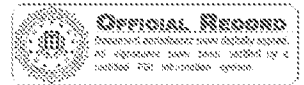
Follow-up Required (SSTF): No

Disseminated Serials:

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UNCLASSIFIED//~~FOUO~~

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION****Electronic Communication****Title:** (U) Request for Country Clearance - [REDACTED]**Date:** 03/31/2015**CC:** [REDACTED]**From:** CRIMINAL INVESTIGATIVE**Contact:** [REDACTED]**Approved By:** A/UC [REDACTED]

SC SALLETT JEFFREY S

Drafted By: [REDACTED]**Case ID #:** [REDACTED]

205-HQ-6117076

(U) [REDACTED]

Torres Advanced Enterprise Solutions;
FCPA

Synopsis: (U) To request approval and country clearance for travel to [REDACTED] for an FCPA investigation. Travel is requested for 4/15/2015 through 4/22/2015.

Preliminary Investigation Initiated: 08/25/2010, set to expire 02/21/2011; extension granted 01/09/2014, set to expire 03/31/2014; extension granted 04/16/2014, set to expire 06/30/2014; extension granted 07/03/2014, set to expire 09/30/2014; extension granted 12/01/2014, set to expire 12/30/2014; extension granted 12/18/2014, set to expire 03/30/2015

Enclosure(s): Enclosed are the following items:

1. (U) Clearance Passage Worksheet [REDACTED]

Details:

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UNCLASSIFIED

Title: (U) Request for Country Clearance [REDACTED]

Re: [REDACTED] 03/31/2015

b7E

The International Corruption Unit (ICU) requests Country Clearance and travel authorization for SSA [REDACTED] for travel to [REDACTED] during the period of 4/15/2015 to 4/22/2015.

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b7DPurpose of Travel:

FBI SSA [REDACTED] is traveling to [REDACTED] to conduct an interview on a pending investigation regarding alleged FCPA violations by a U.S. citizen, [REDACTED] who has a contract for security services with the US Embassy. In early January, 2015, [REDACTED]

[REDACTED]

International Corruption Unit (ICU) SSA [REDACTED] is working with DOS/OIG on this investigation, and they will be traveling to [REDACTED] [REDACTED] to interview the former employee in person and to locate/interview other individuals familiar with [REDACTED] and the [REDACTED] contract with the US Embassy. SSA [REDACTED] will meet with the Legat office and Embassy personnel to talk about our efforts at ICU regarding FCPA violations.

b6
b7CTraveler's personal data is as follows:

NAME: [REDACTED]

DIVISION/FIELD OFFICE: FBIHQ/CID/PCCRS/ICU

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Title: (U) Request for Country Clearance - [REDACTED]

Re: [REDACTED] 03/31/2015

b7E

TITLE: SUPERVISORY SPECIAL AGENT

DATE OF BIRTH: [REDACTED]

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PLACE OF BIRTH: [REDACTED]

SSAN#: [REDACTED]

PASSPORT #: [REDACTED]

ISSUE DATE: 10/01/2010

EXPIRATION DATE: 09/30/2015

TRAVEL ITINERARY: 4/15/2015 - 4/22/2015

(Wed) 4/15 8:40AM: Depart Washington, D.C.

(Wed) 4/15 2:17PM: [REDACTED]

b7E

(Wed) 4/22 7:20AM: [REDACTED]

(Wed) 4/22 5:07PM: Arrive in Washington, D.C.

CURRENT CLEARANCE/ACCESS: TS/SCI

PRIMARY PHONE NUMBER: [REDACTED]

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EMAIL ADDRESS: [REDACTED]

DO YOU NEED THE LEGAT OFFICE TO COORDINATE ACCOMMODATIONS?

No.

Budget Information:

Name of Traveler: [REDACTED]

Dates of Travel: 4/15/2015 - 4/22/2015

Specific Destination: [REDACTED]

b7E

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Title: (U) Request for Country Clearance -
Re: 03/31/2015

b7E

Overall Initiative: FCPA

Approved Dollar Amount for Trip: All expenses paid by the ICU.

Rental Car Authorized for Reimbursement: Yes.

TR# for FCPA: 5R5J31506003

Fund Code: SEWX

Agreement #: 15XX-RA9578H

Line #: N/A

BBFY: 2015

The above information is approved by: ICU Acting Unit Chief.

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Clearance Passage Worksheet

DATE OF REQUEST: <u>3/27/2015</u>				
NAME OF REQUESTOR: <input type="text"/>				
TELEPHONE/EXTENSION: <input type="text"/>		BUILDING/ROOM: <input type="text"/>		
REQUESTOR'S DIVISION: <u>CID</u>				
AGENCY TO BE VISITED: <input type="text"/>				
OFFICIAL BUREAU NAME	SSN	DATE OF BIRTH	PLACE OF BIRTH CITY STATE	
<input type="text"/>				
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
CLEARANCE TO BE PASSED: <u>TS</u>				
ACCESS(ES) TO BE PASSED: <u>SCI</u>				
BEGINNING DATE: <u>4/15/2015</u>		END DATE: <u>4/22/2015</u>		
PURPOSE: <u>For operational travel to</u> <input type="text"/>				
SPONSOR/POINT OF CONTACT (POC): SSA <input type="text"/>		SECURITY POC: <input type="text"/>		
POC PHONE: <input type="text"/>		SECURITY POC PHONE: <input type="text"/>		
POC FAX NUMBER: <input type="text"/>		SECURITY POC FAX: <input type="text"/>		
POC OFFICE SYMBOL/PLA: <input type="text"/>		<input type="text"/>		

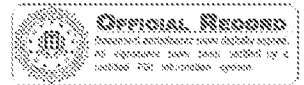
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TO BE COMPLETED BY CPSU PERSONNEL ONLY

AGENCY PASSED TO: <input type="text"/>	RECEIVER: <input type="text"/>
DATE/TIME: <input type="text"/>	COMMUNICATION NEEDED: Yes <input type="checkbox"/> No <input type="checkbox"/>

CLASSIFICATION
Unclassified



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FEDERAL BUREAU OF INVESTIGATION

Electronic Communication

Title: (U) Sabre International Security vs.
Torres Advanced Enterprise Solutions LLC,
et al

Date: 03/31/2015

From: CRIMINAL INVESTIGATIVE

D6-PCIU

Contact:

Approved By:

Drafted By:

Case ID #: 205-HQ-6117076

(U)

Torres Advanced Enterprise Solutions;
FCPA

Synopsis: (U) Documents from civil case 1:11-cv-00806-GK-DAR, Sabre International Security vs. Torres Advanced Enterprise Solutions LLC, et al

Full Investigation Initiated: 02/10/2015

Enclosure(s): Enclosed are the following items:

1. (U) Docket #276 Motion to Dismiss
2. (U) 276-1 [REDACTED] Declaration
3. (U) 276-2 [REDACTED] Declaration
4. (U) 276-3 [REDACTED] Declaration

Details:

On 10 January 2014, three defendants in the Sabre International Security vs. Torres Advanced Enterprise Solutions LLC (Torres AES) et al filed to dismiss counts brought against them for lack of personal jurisdiction. Attached to to 1A file are the declarations of [REDACTED]

According to the court documents, the defendants made the following declarations:

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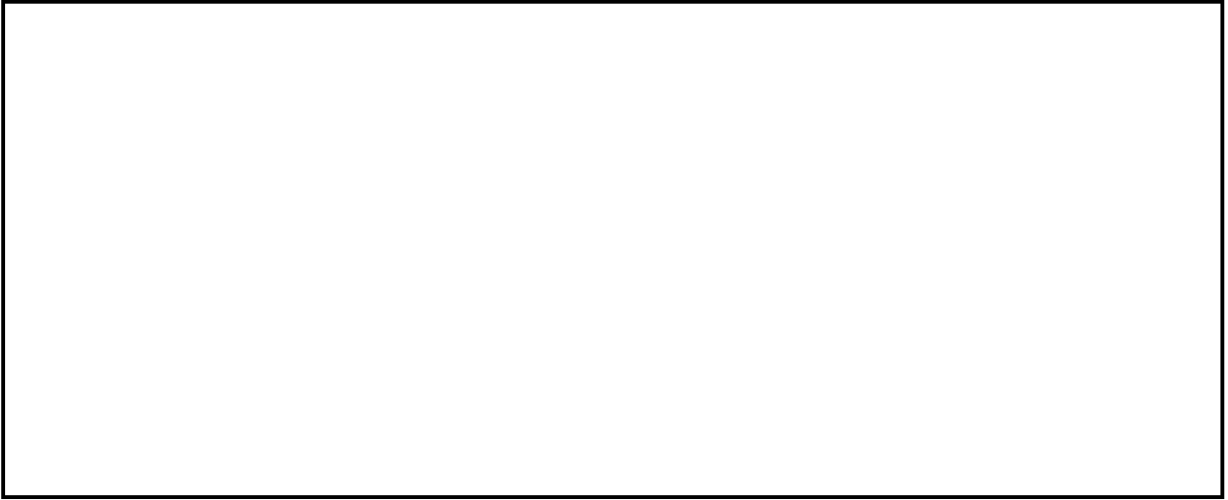
Title: (U) Sabre International Security vs. Torres Advanced Enterprise
Solutions LLC, et al

Re: 205-HQ-6117076, 03/31/2015

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UNCLASSIFIED

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

SABRE INTERNATIONAL SECURITY

Street 14, House 41
Al Harthiyah, Baghdad, Iraq

Plaintiff,

vs.

**TORRES ADVANCED ENTERPRISE
SOLUTIONS, LLC**

2755 Hartland Road Suite 300
Falls Church, VA 22043;

JERRY TORRES

In His Individual Capacity,

3822 Papaya Street
St. James City, Florida, 33956

SCOTT TORRES

In His Individual Capacity,

842 Woodland Avenue
Minneapolis, Kansas 67467-1726

REBEKAH DYER,

In Her Individual Capacity,

4337 Runabout Lane, Unit 177
Fairfax, Virginia 22030-7944; and

KATHY JONES,

In Her Individual Capacity,

3702 Krysia Court
Annandale, Virginia 22003

Defendants.

Case 1:11-cv-00806-GK-DAR

**SPECIALLY APPEARING DEFENDANTS REBEKAH DYER'S, SCOTT TORRES'S
AND KATHRYN JONES'S MOTION TO DISMISS PLAINTIFF'S FIRST AMENDED
COMPLAINT AND INCORPORATED MEMORANDUM OF LAW**

I. Introduction

The Specially Appearing Defendants, Ms. Rebekah Dyer (“Ms. Dyer”), Mr. Scott Torres and Ms. Kathryn Jones (“Ms. Jones”) (collectively the “Defendants”), by and through their undersigned counsel, respectfully move this Court, pursuant to Fed. R. Civ. P. 12(b)(2), to dismiss those counts brought against them for lack of personal jurisdiction, specifically Counts Fifteen through Nineteen and Count Twenty-One of Plaintiff’s First Amended Complaint (“FAC”) as to Ms. Dyer; Counts Fifteen through Nineteen of the FAC as to Mr. Scott Torres and Ms. Jones.

It is Sabre International Security's (“Sabre”) burden to plead sufficient jurisdictional facts that would bring this case within the scope of the District of Columbia's (“the District”) (1) general jurisdiction statute, D.C. Code § 13-422; or (2) long-arm statute, D.C. Code § 13-423, and (3) satisfy the constitutional requirements of due process. Sabre had failed to meet this burden. Therefore, the Defendants' motion to dismiss should be granted.

II. Legal Standards

The plaintiff bears the burden of establishing personal jurisdiction over each defendant. In order to meet this burden, the plaintiff must allege specific facts upon which personal jurisdiction can be based; it cannot rely upon bare allegations and conclusory allegations. *See GTE New Mexico Servs., Inc. v. Ameritech Corp.*, 21 F. Supp. 2d 27, 36 (D.D.C. 1998), *remanded on other grounds sub nom. GTE New Media Servs., Inc. v. BellSouth Corp.*, 199 F.3d 1343 (D.C. Cir. 2000).

Moreover, the plaintiff cannot aggregate factual allegations concerning multiple defendants in order to demonstrate personal jurisdiction over any individual defendant. *See Rush v. Savchuk*, 444 U.S. 320, 331-32 (1980). When considering personal jurisdiction, the Court need not treat all of the plaintiff's allegations as true. Instead, the court "may receive and weigh affidavits and other relevant matter to assist in determining the jurisdictional facts." *United States v. Philip Morris*, 116 F. Supp. 2d 116, 120 n.4 (D.D.C. 2000).

For the Court to exercise personal jurisdiction over a defendant, the Due Process Clause requires that the plaintiff show "'minimum contacts' between the defendant and the forum establishing that 'the maintenance of the suit does not offend traditional notions of fair play and substantial justice.'" *GTE New Media Servs., Inc.*, 199 F.3d at 1347 (quoting *Int'l Shoe Co. v. Washington*, 326 U.S. 310, 316 (1945)). Moreover, "the defendant's conduct and connection with the forum State" should be such that the defendant should "reasonably anticipate being haled into court there." *World-Wide Volkswagen Corp. v. Woodson*, 444 U.S. 286, 297 (1980). "[T]his 'fair warning' requirement is satisfied if the defendant has purposefully directed' his activities at residents of the forum ... and the litigation results from the alleged injuries that 'arise out of or relate to' those activities." *Burger King Corp. v. Rudzewicz*, 471 U.S. 462 (1985).

"[A]s a general rule, courts cannot exert jurisdiction over individual corporate officers and employees 'just because the court has jurisdiction over the corporation.'" *Kopff*, 425 F. Supp. 2d at 76, 84 (D.D.C. 2006) (quoting *Flocco v. State Farm Mu. Auto. Ins. Co.*, 752 A.2d 147, 162 (D.C. 2000)); *see also Richards v. Duke Univ.*, 480 F. Supp. 2d 222 (D.D.C. 2007) (dismissing claims against Bill Gates for lack of personal jurisdiction). The "plaintiff bears the burden of demonstrating that the individual defendants are subject to personal jurisdiction in

their own right apart from any jurisdiction that might exist over their employers.” *D’Onofrio*, 534 F. Supp. 2d at 90-91 (citing *Keeton v. Hustler Magazine, Inc.*, 465 U.S. 770, 781 n.13 (1984); *see also Richard v. Bell Atlantic Corp.*, 976 F. Supp. 40, 50 (D.D.C. 1997) (dismissing claims against Chairman and CEO “because acts committed within the scope of employment cannot be imputed to the individual defendants to establish personal jurisdiction”).

There are two distinct forms of personal jurisdiction: (1) general jurisdiction, which provides authority for the court to hear a suit against a defendant “without regard to the claim’s relationship *vel non* to the defendant’s forum-linked activity”; and (2) specific jurisdiction for “controversies based on acts of a defendant that touch and concern the forum.” *See Kopff*, 425 F. Supp. 2d at 81.

General jurisdiction “sets a high bar” and requires that the defendant maintain “continuous and systematic” contacts within the forum. *See D’Onofrio v. SFX Sports Group, Inc.*, 534 F. Supp. 2d 86, 90 (D.D.C. 2008) (dismissing plaintiff’s claims against corporate executives for lack of personal jurisdiction) (internal citations omitted). Specific jurisdiction requires a two-step inquiry, as follows: “first, jurisdiction over the defendant must be authorized by the forum’s long-arm statute, here D.C. Code § 13-423”; and second, the “exercise of that jurisdiction must satisfy the federal requirement of constitutional due process.” *Id.* at 90 (citing *United States v. Ferrara*, 54 F.3d 825, 828 (D.C. Cir. 1995)). The D.C. long-arm statute provides, in pertinent part, that:

A District of Columbia court may exercise personal jurisdiction over a person, who acts directly or by an agent as to a claim for relief arising from the person’s –

- 1) transacting any business in the District of Columbia;
- 2) contracting to supply services in the District of Columbia;
- 3) causing tortious injury in the District of Columbia by an act or omission in the District of Columbia; [or]

- 4) causing tortious injury in the District of Columbia by an act or omission outside the District of Columbia if he regularly does or solicits business, engages in any other persistent course of conduct, or derives substantial revenue from goods used or consumed, or services rendered, in the District of Columbia.

D.C. Code § 13-423(a)(1)-(4).

III. Sabre has failed to allege any facts that would make the Defendants in each of their individual capacities subject to this Court's jurisdiction.

Sabre has not alleged a *single* fact in its 116 page, 500-plus paragraph FAC linking Ms. Dyer, Mr. Scott Torres or Ms. Jones to the District in either his or her personal or corporate capacity. Sabre merely states in a conclusory allegation, without any factual basis, that “each of the defendants is subject to the Court's personal jurisdiction with respect to this action.” FAC ¶ 8. Sabre apparently is relying upon the forum selection clause contained in the Teaming Agreement between Torres Advanced Enterprise Solutions, LLC (“TAES”) and Sabre (the “Teaming Agreement”) as its *sole* basis for asserting that each of the Defendants is subject to the Court's personal jurisdiction. It alleges that the Teaming Agreement provides that “Torres and Sabre each shall submit to the venue of any court of competent jurisdiction located in the District of Columbia.” FAC ¶ 9. Sabre's reliance upon the Teaming Agreement's governing jurisdiction provision is misplaced and simply does not support the exercise of jurisdiction over the Defendants in their individual capacities.

The Teaming Agreement provides: “Should any dispute arise under, relating to or concerning this Agreement, each *party* shall submit to the jurisdiction and venue of any court of competent jurisdiction located in the District of Columbia, United States of America, and shall not object to the exercise of jurisdiction and venue of any such court.” FAC, Ex. A at 5, § 3.2 (emphasis added).

The operative word here is “party.” Sabre has not alleged, and cannot allege, that any of the Defendants, in their individual capacities, is a party to the Teaming Agreement and is

therefore bound by it. *See e.g., Shaheen v. Smith*, No. 12-1168, 2013 WL 5995619 at *3 (D.D.C. Nov. 13, 2013) (holding that forum selection clauses are exclusive to action between parties to the clause). Ms. Dyer, Mr. Scott Torres and Ms. Jones are not parties to the Teaming Agreement, and therefore they are not bound by that agreement's provisions.

Sabre has not and cannot present a *prima facie* case establishing personal jurisdiction over the Defendants on the basis of the forum selection clause in that agreement. Sabre's failure to establish that each of the individual Defendants is subject to personal jurisdiction apart from any jurisdiction that might exist over TAES is fatal here. For this reason, the Defendants' motion to dismiss should be granted.

IV. The Defendants individually do not have contacts within the District to support the Court's exercise of either specific or general personal jurisdiction over each of them.

For the following reasons, this Court lacks personal jurisdiction over Ms. Dyer, Mr. Scott Torres and Ms. Jones in each of their personal capacities.

Ms. Dyer simply has no contacts within the District to support the Court's exercise of general jurisdiction pursuant to D.C. Code § 13-422 or specific personal jurisdiction pursuant to D.C. Code § 13-423: she lives in Virginia, owns real property in Virginia and has been a resident of Virginia since 2000; she has never lived in the District; she does not own real property in the District; she has never worked in the District; neither her company, Global Language Strategies, LLC, nor her employer, Northern Virginia Community College, maintains any offices in the District; and while she is enrolled in evening classes in the District and occasionally visits for leisure purposes, those actions are not sufficient to support this Court's exercise of personal jurisdiction over her. Declaration of Rebekah Dyer dated January 1, 2014 ("Dyer Declaration") ¶¶ 1-6, 10-11. Moreover, she has not personally transacted any business or

committed any acts in the District that would give rise to the allegations in the FAC. Declaration of Rebekah Dyer dated January 1, 2014. *Id.* ¶ 12.

Similarly, Mr. Scott Torres has no contact within the District to support general or specific personal jurisdiction over him: he lives in Kansas, owns real property in Kansas and has been a resident of Kansas for over 29 years; he does not own any real property in the District; he has never lived in the District; he has never worked in the District; his employers do not maintain any offices in the District; and his last visit to the District was over three years ago. Declaration of Scott Torres dated January 2, 2014 ¶¶ 2-4, 8-9 (“Scott Torres Declaration”). Moreover, he has not personally transacted any business or committed any acts in the District that would give rise to the allegations in the FAC. *Id.* ¶ 10.

Finally, Ms. Jones has no contacts within the District that would support general or specific personal jurisdiction over her: she lives in Virginia, owns real property in Virginia and has been a resident of Virginia since 1997; she does not own any real property in the District and has not lived in the District; she occasionally visits the District for leisure purposes; and while Ms. Jones was employed from February 1, 2011 to November 18, 2013 in the District by TSymmetry, Inc. (“TSymmetry”), as discussed below in Section IV.B., that fact alone does not form the basis for the Court's exercise of general jurisdiction over her. Declaration of Kathryn Jones dated January 4, 2014 ¶¶ 2-4, 9-10. Moreover, she has not personally transacted any business or committed any acts in the District that would give rise to the allegations in the FAC. *Id.* ¶ 11.

A. The Court lacks specific personal jurisdiction over Ms. Dyer, Mr. Scott Torres and Ms. Jones.

Sabre does not allege the basis of specific jurisdiction over Ms. Dyer, Mr. Scott Torres and Ms. Jones. Sabre does not cite the D.C. long-arm statute, D.C. Code § 13-423, nor does it

identify what section of the D.C. long-arm statute it believes applies to the Defendants. Sabre simply makes the conclusory and unsupported assertion that “[e]ach of the defendants is subject to the Court's personal jurisdiction with respect to this action.” FAC at ¶¶ 8-9. Sabre has failed to present a *prima facie* case establishing specific personal jurisdiction over the Defendants. *See Kopff*, 425 F. Supp. 2d at 81 (“In order to establish specific jurisdiction over a non-resident defendant in a diversity case such as this, plaintiffs must plead facts that (1) bring the case within the scope of the District of Columbia's long-arm statute, D.C. Code § 13-423, and (2) satisfy the constitutional requirements of due process.”).

Sabre has failed to demonstrate that the individual Defendants are subject to personal jurisdiction “apart from any jurisdiction that might exist over [TAES].” *D’Onofrio*, 534 F. Supp. 2d at 90-91. Any personal jurisdiction conferred upon TAES pursuant to the Teaming Agreement's governing jurisdiction provision cannot be a basis of jurisdiction over the individual Defendants in this matter.

As a general rule, “[p]ersonal jurisdiction over the employees or officers of a corporation in their individual capacities must be based on their *personal* contacts with the forum and not their acts and contacts carried out solely in a corporate capacity.” *Wiggins v. Equifax*, 853 F. Supp. 500, 503 (D.D.C. 1994) (emphasis added); *see also Richards v. Bell Atlantic Corp.*, 976 F. Supp. 40 (D.D.C. 1997) (“[P]laintiffs have failed to plead sufficient jurisdictional facts, because acts committed within the scope of employment cannot be imputed to the individual defendants to establish personal jurisdiction over them.”). For example, in *D’Onofrio*, a plaintiff brought a discrimination action against her former employer and two company executives – the former Chief Financial Officer and the Head of Human Resources – in their individual capacities, alleging the executives participated in the alleged discriminatory and retaliatory act of

terminating the plaintiff. *Id.* at 88-89. The court granted the executives' motion to dismiss for lack of personal jurisdiction because the plaintiff's factual assertions did not involve the executives "doing business with the District in their personal capacities," and instead, "[f]ll squarely within [the executives'] scope of employment" because they were actions "taken pursuant to [the executives'] official corporate duties and responsibilities." *Id.* at 92. Here, Sabre fails to assert a single contact that Ms. Dyer, Mr. Scott Torres or Ms. Jones has within the District in either his or her personal or corporate capacity.

There is an exception to the general rule that courts cannot exert jurisdiction over individual corporate officers just because the court has jurisdiction over the corporation, called the "more than an employee" exception, but it does not apply here. Courts have applied this "more than an employee" to very limited cases where (1) the corporation has sufficient contacts within the District to meet the D.C. long-arm statute and due process requirements; and (2) the employee is a senior executive who controls all aspects of the relevant corporate policies. *See, e.g., Covington & Burling v. Int'l Mktg. & Research, Inc.*, 2003 WL 21384825 (D.C. Super. Ct. Apr. 17, 2003) (extending personal jurisdiction over the only two corporate officers involved in all aspects of a fax company which "purposefully availed itself of the privilege of conducting activities in the District of Columbia" by sending 1,634 unsolicited faxes to a D.C.-based law firm in violation of the Telephone Consumer Protection Act); *Nat'l Cmty Reinvestment Coal. v. NovaStar Fin., Inc.*, 631 F. Supp. 2d 1, 3-4 (D.D.C. 2009) (extending personal jurisdiction to the President/Chief Operating Officer/co-founder of a mortgage company where he personally developed and implemented the discriminatory lending policies which lead to only 1,230 of 3,021 loan applications from District of Columbia residents being approved); *The Family Fed. For World Peace and Unification Int'l v. Moon*, 2012 WL 3070965 (D.C. Super. June 19, 2012)

(“[I]f a court finds the “more than an employee” exception applies, a court can *impute* the corporation's *contacts with the District* to the individual defendants who control the corporation.”) (emphasis added).

During her employment with TAES, Ms. Dyer held several positions including marketing coordinator, director of marketing and communications, and vice president and chief operating officer. Dyer Decl. ¶ 7. Mr. Scott Torres is currently a TAES pricing analyst. He previously held the positions of project manager, project coordinator and program and security contracts manager. Scott Torres Decl. ¶ 5. During Ms. Jones employment with TAES, she held the position of chief financial officer. Jones Decl. ¶ 6. None of the Defendants had or has any ownership interest in TAES, nor were any of them a member or manager of TAES pursuant to its operating agreement. Dyer Decl. ¶ 8; Scott Torres Decl. ¶ 6; Jones Decl. ¶ 7. Moreover, none of the Defendants were given authority by TAES to direct or control the creation of TAES's corporate policies, procedures or operations. Dyer Decl. ¶ 9; Scott Torres Decl. ¶ 7; Jones Decl. ¶ 8. Based on the foregoing, the “more than an employee” exception does not apply to these Defendants. *NovaStar*, 631 F. Supp. 2d at 13 (“It is clear from these decisions that an individual's role as a corporate officer, without more, is not a sufficient basis for exercising personal jurisdiction over the officer in his individual capacity.”); *see also D'Onofrio*, 534 F. Supp. 2d at 93, n.6 (refusing to confer personal jurisdiction where the Chief Financial Officer and Head of Human Resources were “most certainly not the only corporate officers of their respective companies” and did not “control all aspects of the relevant corporations”); *Richards v. Duke Univ.*, 480 F. Supp. 2d at 230 (refusing to confer personal jurisdiction over Bill Gates of Microsoft).

Sabre has cited no case, and we can find none, where a court has extended personal jurisdiction to a corporate executive under this “more than an employee” exception where the plaintiff failed to allege a *single contact* of either the corporation or the executive within the District and the executive has transacted no business in the District in his/her corporate capacity.¹ In fact, courts have defined the “more than an employee” exception itself as “*attribut[ing]*” or “*imputing*” the corporation's *connections* with the District of Columbia to certain corporate executives. *Novastar*, 631 F. Supp. 2d at 6; *Moon*, 2012 WL 3070965 at *5. Sabre has not alleged that TAES has even minimal contacts within the District, and none of the Defendants' actions alleged in the FAC are within the scope of the D.C. long-arm statute or involve contacts with the District.

The D.C. long-arm statute does not reach the Defendants in their personal capacities. Sabre has not alleged, nor can it allege, that any of the Defendants has personally transacted any business or caused tortious injury in the District of Columbia that gave rise to Sabre's claims. *See* D.C. Code § 13-423(a)(1) and (3)-(4); Dyer Decl. ¶ 6; Scott Torres Decl. ¶ 6; Jones Decl. ¶ 11. The only contact that any of the Defendants have with the District is Ms. Jones' employment with TSymmetry in the District from February 1, 2011 through November 18, 2013. This contact is not relevant for purposes of the Court's jurisdictional analysis under the D.C. long-arm statute because Sabre has not alleged, and cannot allege, that any of its claims in the FAC arise from Ms. Jones' employment with TSymmetry. D.C. Code § 13-423(b).

¹ *Cf. Novastar*, 631 F. Supp. 2d at 6 (“[B]ecause this Court has already held that the due process cause has been satisfied through [defendant corporation's] transactions with District residents, subsection of (a)(1) of the longarm statute is satisfied as well.”); *Azamar v. Stern*, 662 F. Supp. 2d 166, 173 (2009) (holding that the individual defendant “had continuous and systematic business activity in the District of Columbia sufficient for the Court to exercise general jurisdiction” over him); *The Family Fed. For World Peace and Unification Int'l v. Moon*, 2012 WL 3070965 (D.C. Super. Ct. June 19, 2012) (exercising personal jurisdiction over individual employees of DC-based corporation who conducted sufficient business within the District and whose tortious conduct within the District caused plaintiff's injury).

Sabre claims that each of the Defendants is liable in their individual capacities with respect to the Counts brought against them in the FAC, but none of the factual allegations underlying these Counts have a nexus with the District of Columbia. Sabre has not alleged any actions that fall within the purview of the D.C long-arm statute. Sabre's failure to plead *any* facts regarding the Defendants that bring the case within the scope of the District of Columbia's long-arm statute, D.C. Code § 13-423, and satisfy the constitutional requirements of due process is fatal here.

B. The Court does not have general personal jurisdiction over Ms. Dyer, Mr. Scott Torres or Ms. Jones.

Sabre has alleged “no facts to satisfy the steep requirement of continuous and systematic contacts with the District of Columbia sufficient to impose general jurisdiction.” *D’Onofrio v. SFX Sports Group, Inc.*, 534 F. Supp. 2d 86, 90 (D.D.C. 2008). Sabre has not, and cannot, establish a basis for general personal jurisdiction over Ms. Dyer, Mr. Scott Torres or Ms. Jones. A District of Columbia court may exercise general personal jurisdiction as to any claim for relief over a person who is domiciled in, organized under the laws of, or maintains a principal place of business in the District of Columbia. D.C. Code § 13-422.

None of those factors exist here. Rebekah Dyer resides in Virginia. Dyer Decl. ¶ 2. She has never worked or lived in the District. Dyer Decl. ¶ 10. Mr. Scott Torres resides in Kansas. Scott Torres Decl. ¶ 2. He has never worked or lived in the District of Columbia. Scott Torres Decl. ¶ 8. There is no basis for the exercise of general jurisdiction over Ms. Dyer and Mr. Scott Torres pursuant to D.C. Code § 13-422.

Ms. Jones resides in Virginia. Jones Decl. ¶ 2. She has never lived in the District of Columbia. *Id.* ¶ 9. Following her employment with TAES, Ms. Jones was employed in the District of Columbia from February 1, 2011 through November 18, 2013 by TSymmetry. *Id.* ¶ 4.

There is a paucity of case law addressing the application of the provisions of D.C. Code § 13-422 in situations where a person who resides outside of the District of Columbia commutes to work for an employer within the District.² However, in *Higgins v. State Loan Co.*, 114 F.2d 25, 27 (D.C. Cir. 1940), the court in deciding what constitutes a “principal place of business” pursuant to the jurisdictional statute governing bankruptcy filings, held that an individual does not have a place of business in a jurisdiction because he is employed by another there. Other jurisdictions have found that mere employment does not constitute “having a place of business.” See e.g., *In re Lippart, D.C.*, 201 F.103, 105 (D.N.Y. 1912) (“[A] clerk or employee cannot be said to be in business or to have a place of business solely by virtue of the fact that he earns his living in the employment of another at a place other than his residence.”). The fact that Ms. Jones, who has never lived in the District, was employed by TSymmetry in the District does not give rise to this Court's general personal jurisdiction over her.

V. Conclusion

For the foregoing reasons, Rebekah Dyer, Scott Torres and Kathryn Jones each respectfully submits that this Court lacks personal jurisdiction over them in their personal

²In the only case we found applying D.C. Code § 13-422 to a commuter employee, *T.M.P. v. G. C.M.*, 124 WLR 233 (D.C. Super. Ct. Feb. 8 1996), a paternity and child support action, the court held that commuting into the District for employment purposes did not qualify as “maintaining a principal place of business” for purposes of the statute. The respondent claimed that the court did not have jurisdiction over him on the grounds that he lived in Virginia and was working in the District. The court addressed the question of whether it had specific jurisdiction over the respondent pursuant to the D.C. long-arm statute and general jurisdiction based on an “enduring relationship” with the District as required by D.C. Code § 13-422. The court found that the paternity in the matter was not derivative of any transaction of business in the District and that the respondent's “mere employment” in the District could not fairly be said to constitute transacting business under the D.C. long-arm statute or maintaining a principal place of business in the district under D.C. Code § 13-422. The court held that:

Likewise, D.C. Code § 13-422, respecting personal jurisdiction based on an ‘enduring relationship’ with the District, is inapplicable because . . . the Respondent is not ‘a person domiciled in . . . or maintaining . . . his principal place of business in’ D.C. for these purposes.

capacities; therefore, Sabre's claims against Ms. Dyer, Mr. Scott Torres and Ms. Jones should be dismissed.

January 10, 2014

Respectfully submitted,

/s/ Patricia E. Bruce

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R. Scott Caulkins, Esq., DC Bar No. 369068

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scaulkins@caulkinsbruce.com

jdahnke@caulkinsbruce.com

Counsel for Specially Appearing Defendants

Rebekah Dyer, Scott Torres and Kathryn Jones

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of January 2014, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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*Counsel for Specially Appearing Defendant
Jerry Torres*

/s/ Patricia E. Bruce

Patricia E. Bruce

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

SABRE INTERNATIONAL SECURITY

Street 14, House 41
Al Harthiyah, Baghdad, Iraq

Plaintiff,

vs.

**TORRES ADVANCED ENTERPRISE
SOLUTIONS, LLC**

2755 Hartland Road Suite 300
Falls Church, VA 22043;

JERRY TORRES

In His Individual Capacity,

3822 Papaya Street
St. James City, Florida, 33956

SCOTT TORRES

In His Individual Capacity,

842 Woodland Avenue
Minneapolis, Kansas 67467-1726

REBEKAH DYER,

In Her Individual Capacity,

4337 Runabout Lane, Unit 177
Fairfax, Virginia 22030-7944; and

KATHY JONES,

In Her Individual Capacity,

3702 Krysia Court
Annandale, Virginia 22003

Defendants.

Case 1:11-cv-00806-GK-DAR

DECLARATION OF REBEKAH DYER

I, Rebekah Dyer, declare under penalty of perjury as follows:

1. I am duly competent to make this Declaration. I have personal knowledge of all the facts stated herein, and all stated facts are true and accurate.

2. I am a resident of the Commonwealth of Virginia. I currently reside at 4337 Runabout Lane, Fairfax, VA 22030. I have maintained my residence in the Commonwealth of Virginia since January 2000. I have a Virginia drivers' license and my car is registered in Virginia.

3. I own real property located in the Commonwealth of Virginia.

4. I have been self-employed since April 10, 2013. I am president and chief executive officer of Global Language Strategies, LLC ("GLS"), a Virginia limited liability company, located at 3911 Old Lee Highway, Suite 41-A, Fairfax, VA 22030. I have also been an adjunct professor at Northern Virginia Community College ("NVCC") in Manassas, Virginia since August 2013. Neither GLS nor NVCC maintains an office in the District of Columbia.

5. I am currently enrolled in Georgetown University's doctoral program in liberal studies. On average, I attend classes in the District of Columbia one evening per week during the program year.

6. My previous employer was Torres Advanced Enterprise Solutions, LLC ("Torres AES"). I worked for Torres AES from January 2008 to April 2013 both at its former office located at 2111 Wilson Blvd., Arlington, Virginia 22201 and its current office located at 2755 Hartland Road, Falls Church, Virginia 22043.

7. I held several positions at Torres AES including marketing coordinator, director of marketing and communications, vice president and chief operating officer in the Commonwealth of Virginia.

8. I was not and am not an owner, member or manager of Torres AES pursuant to its operating agreement.

9. In my positions with Torres AES, I was not given authority to direct or control the creation of Torres AES's corporate policies, procedures or operations.

10. I have never worked or lived in the District of Columbia.

11. I occasionally visit the District of Columbia for leisure purposes. The last time I did so was in mid-November 2013.

12. I have not personally transacted any business or committed any acts in the District of Columbia that would give rise to the allegations in Plaintiff's First Amended Complaint. I have not had any contact or communication with Plaintiff in the District of Columbia other than my depositions in this matter on March 21 and 22, 2013.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 1, 2014


Rebekah Dyer

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

SABRE INTERNATIONAL SECURITY

Street 14, House 41
Al Harthiyah, Baghdad, Iraq

Plaintiff,

vs.

**TORRES ADVANCED ENTERPRISE
SOLUTIONS, LLC**

2755 Hartland Road Suite 300
Falls Church, VA 22043;

JERRY TORRES

In His Individual Capacity,

3822 Papaya Street
St. James City, Florida, 33956

SCOTT TORRES

In His Individual Capacity,

842 Woodland Avenue
Minneapolis, Kansas 67467-1726

REBEKAH DYER,

In Her Individual Capacity,

4337 Runabout Lane, Unit 177
Fairfax, Virginia 22030-7944; and

KATHY JONES,

In Her Individual Capacity,

3702 Krysia Court
Annandale, Virginia 22003

Defendants.

Case 1:11-cv-00806-GK-DAR

DECLARATION OF SCOTT TORRES

I, Scott Torres, declare under penalty of perjury as follows:

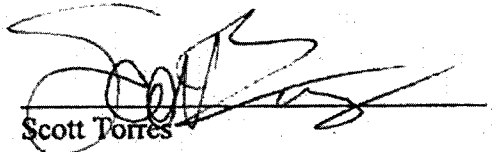
1. I am duly competent to make this Declaration. I have personal knowledge of all the facts stated herein, and all stated facts are true and accurate.
2. I am a resident of the State of Kansas. I currently reside at 842 Woodland Avenue, Minneapolis, Kansas 67467. I have maintained my residence in the state of Kansas for over 29 years. I have a Kansas drivers' license and my car is registered in Kansas.
3. I own real property located in the State of Kansas.
4. I am employed by Torres Advanced Enterprise Solutions, LLC ("Torres AES") located at 217 West 2nd Minneapolis, Kansas 67467. I am also employed by Good Samaritan Society ("Good Samaritan") located at 815 North Rothsay Avenue, Minneapolis, Kansas 67467. I have worked for Torres AES since January 2006 and for Good Samaritan for the past three months. Neither of my employers maintains an office in the District of Columbia.
5. I am currently a pricing analyst for Torres AES. In that position I build pricing models and calculate manning and equipment requirements for contracts. In regard to the TWISS program, I have held positions as Torres AES's project manager, project coordinator and program and security contracts manager. In those positions I recruited personnel, built pricing models and calculated manning requirements.
6. I was not and am not an owner, member or manager of Torres AES pursuant to its operating agreement.
7. In my positions with Torres AES, I was not given authority to direct or control the creation of Torres AES's corporate policies, procedures or operations.
8. I have never worked or lived in the District of Columbia.

9. The last time I visited the District of Columbia was over three years ago when I flew into Reagan National Airport on my way to Arlington, Virginia for business. During that trip, I briefly visited the District of Columbia for leisure purposes.

10. I have not personally transacted any business or committed any acts in the District of Columbia that would give rise to the allegations in Plaintiff's First Amended Complaint. I have not had any contact or communication with Plaintiff in the District of Columbia. My only contact with Plaintiff since the filing of the Complaint in this matter was during my deposition in this matter on March 14, 2013 which took place in Kansas City, Missouri.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 2, 2014


Scott Torres

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

SABRE INTERNATIONAL SECURITY

Street 14, House 41
Al Harthiyah, Baghdad, Iraq

Plaintiff,

vs.

**TORRES ADVANCED ENTERPRISE
SOLUTIONS, LLC**

2755 Hartland Road Suite 300
Falls Church, VA 22043;

JERRY TORRES

In His Individual Capacity,

3822 Papaya Street
St. James City, Florida, 33956

SCOTT TORRES

In His Individual Capacity,

842 Woodland Avenue
Minneapolis, Kansas 67467-1726

REBEKAH DYER,

In Her Individual Capacity,

4337 Runabout Lane, Unit 177
Fairfax, Virginia 22030-7944; and

KATHY JONES,

In Her Individual Capacity,

3702 Krysia Court
Annandale, Virginia 22003

Defendants.

Case 1:11-cv-00806-GK-DAR

DECLARATION OF KATHRYN JONES

I, Kathryn Jones, declare under penalty of perjury as follows:

1. I am duly competent to make this Declaration. I have personal knowledge of all the facts stated herein, and all stated facts are true and accurate.

2. I am a resident of the Commonwealth of Virginia. I currently reside at 3702 Krysia Court, Annandale, VA 22003. I have maintained my residence in the Commonwealth of Virginia since 1997. I have a Virginia drivers' license and my car is registered in Virginia.

3. I own real property located in the Commonwealth of Virginia and the State of Maryland.

4. I am not currently employed. My previous employer was TSymmetry, Inc. ("TSymmetry") located at 1700 K Street, NW, Washington, DC 20006. I was employed by TSymmetry from February 1, 2011 through November 18, 2013 as Vice President, Finance and Administration. In that position, I reported to the Chief Executive Officer and took direction from the Chief Operating Officer and Chief Executive Officer. I was not and am not an owner, shareholder or director of TSymmetry. In my position with TSymmetry, I was not given authority to direct or control the creation of TSymmetry's corporate policies, procedures or operations.

5. On November 18, 2013, I was told that my position with TSymmetry was being eliminated due to a loss of business. TSymmetry terminated my employment on November 18, 2013.

6. My previous employer was Torres Advanced Enterprise Solutions, LLC ("Torres AES"). I was employed by Torres AES from January 2009 through January 2011 at its office

located at 2111 Wilson Blvd., Arlington, Virginia 22201. I held the position of Chief Financial Officer.

7. I was not and am not an owner, member or manager of Torres AES pursuant to its operating agreement.

8. In my position with Torres AES, I was not given authority to direct or control the creation of corporate policies, procedures or operations.

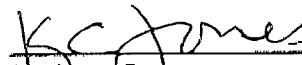
9. I have never lived in the District of Columbia.

10. I occasionally visit the District of Columbia for leisure purposes.

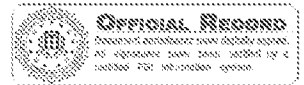
11. I have not personally transacted any business or committed any acts in the District of Columbia that would give rise to the allegations in Plaintiff's First Amended Complaint. I have not had any contact or communication with Plaintiff in the District of Columbia other than my deposition in this matter on February 14, 2013.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 04, 2014


Kathryn Jones

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION****Electronic Communication****Title:** (U) Country Clearance concurrence for SSA [redacted]**Date:** 04/09/2015**CC:** [redacted]**From:** [redacted]**Contact:** [redacted]**Approved By:** [redacted]**Drafted By:** [redacted]**Case ID #:** [redacted]

205-HQ-6117076

(U) [redacted]

Torres Advanced Enterprise Solutions;
FCPA**Synopsis:** (U) Country Clearance concurrence for SSA [redacted]
from 4/15/2015 to 4/22/2015, to [redacted]**Preliminary Investigation Initiated:** 08/25/2010, set to expire 02/21/2011; extension granted 01/09/2014, set to expire 03/31/2014; extension granted 04/16/2014, set to expire 06/30/2014; extension granted 07/03/2014, set to expire 09/30/2014; extension granted 12/01/2014, set to expire 12/30/2014; extension granted 12/18/2014, set to expire 03/30/2015**Details:****Details:** 1. [redacted] concurs with requested travel to [redacted] between 4/15/2015 to 4/22/2015.

To facilitate mandatory accountability with SIOC, FBI traveler(s) are

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b7E

UNCLASSIFIED

Title: (U) Country Clearance concurrence for SSA [REDACTED]

Re: [REDACTED] 04/09/2015

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to contact Legat [REDACTED] upon arrival to the Legat AOR, or advise the POC if the travel is postponed or canceled (see Item 6, below, for further information). Legat requests to be included as an addressee in any "after-action" report, EC, or email.

The POC for this travel is CID SA [REDACTED] cell phone number [REDACTED]

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[REDACTED]
[REDACTED] telephone

[REDACTED] **Direct telephone line to the Legat Office is** [REDACTED]

When possible, traveler(s) should notify the Legat Office in advance of arrival if planning to visit the Embassy so that an Access Request form can be submitted to the RSO office.

2. Hotel arrangements are hard to find on short notice and are frequently above per diem, especially during the "high season" (Dec-April). Current lodging/per diem rates for [REDACTED]

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Hotel/Address/Telephone No. [REDACTED] country code)/Websites

b7E

UNCLASSIFIED

UNCLASSIFIED

Title: (U) Country Clearance concurrence for SSA [REDACTED]

Re: [REDACTED] 04/09/2015

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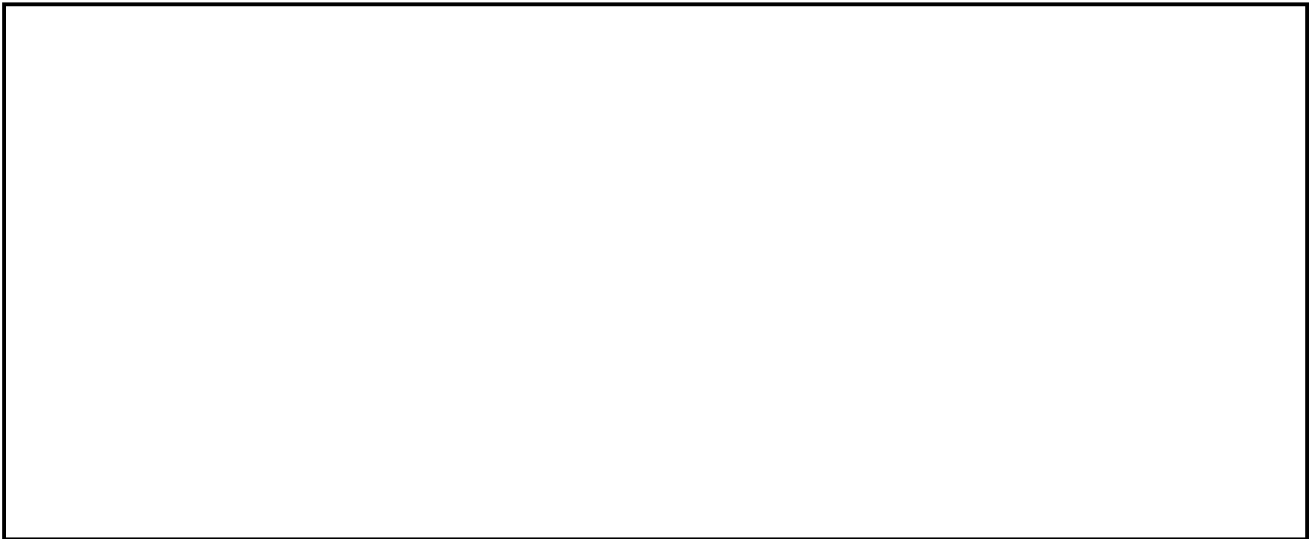


Other hotel options may be found by visiting an Internet web-browser, such as www.hotels.com or www.expedia.com, for example.

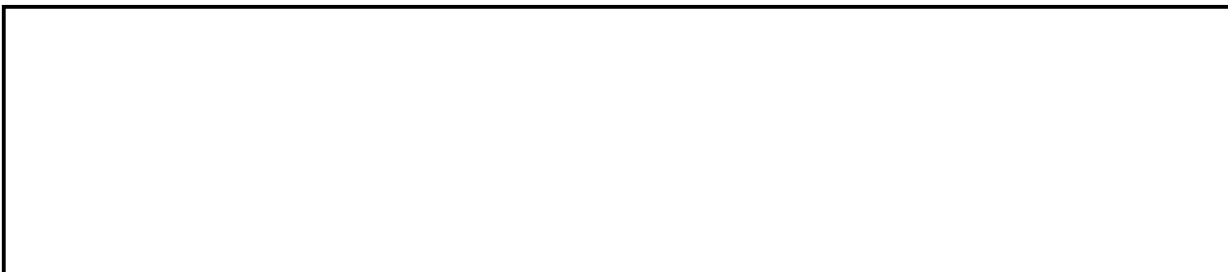
3. In an effort to protect IOD and TDY FBI personnel supporting IOD abroad, IOD policy states that all personnel serving abroad in an official capacity must prepare and submit a DD-1833 form Isolated Personnel Report (ISOPREP). The form may be found via the following link on the FBI Intranet website:



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UNCLASSIFIED

UNCLASSIFIED

Title: (U) Country Clearance concurrence for SSA [REDACTED]

Re: [REDACTED] 04/09/2015

b6
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Telephone - [REDACTED]

Telephone - [REDACTED]

Telephone - [REDACTED]

Telephone - [REDACTED]

Facsimile - General Use 202-323-2079

Facsimile - Secure 202-323-2081

7. Special Agents are reminded that they have no investigative authority in [REDACTED] and traveling to [REDACTED] with weapons is prohibited.

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8. U.S. currency is accepted in [REDACTED] and major credit cards are widely accepted. However, visitors are warned that large denominational bills (\$50 and larger) are often closely scrutinized or refused due to counterfeiting fears.

9. All official USG travelers to [REDACTED] should enter on diplomatic or official passports- no visa is required for stays less than 90 days.

10. Use taxis for transportation between the Embassy and the hotel unless other arrangements are made. Taxis in [REDACTED] do not use meters and fares should be agreed upon in advance. Travel by bus (known as a [REDACTED]) is not advised.

b7E

11. During the April-to-December rainy season, [REDACTED] experiences heavy rain most days, often with brief flooding in the streets or walkways. During the rest of the year, rains are less frequent. The temperature is warm and during the rainy season, very humid. Travelers are advised to pack accordingly.

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UNCLASSIFIED

UNCLASSIFIED

Title: (U) Country Clearance concurrence for SSA [REDACTED]

Re: [REDACTED] 04/09/2015

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13. Medical assessment: Yellow Fever Vaccine: There are no required vaccinations for entry into [REDACTED] from the United States. Yellow fever vaccination is recommended for all travelers over 9 months of age destined for [REDACTED]

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Malaria: There is no risk of malaria in [REDACTED] or in the former [REDACTED]. Risk exists in the rural areas of [REDACTED]. Chloroquine-resistant malaria has been confirmed in [REDACTED] rural areas.

Dengue: Risk exists in [REDACTED]. There is no vaccine available to prevent dengue or dengue hemorrhagic fever. Visitors must prevent mosquito bites through the use

UNCLASSIFIED

UNCLASSIFIED

Title: (U) Country Clearance concurrence for SSA [REDACTED]

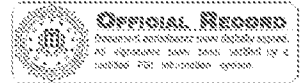
Re: [REDACTED] 04/09/2015

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of personal protection measures such as insect repellents
containing 30-35% DEET concentration.

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FEDERAL BUREAU OF INVESTIGATION

Date of entry 05/06/2015

On 04/20/2015, [REDACTED] DOB: [REDACTED]
[REDACTED] was interviewed in [REDACTED] Also
present for the interview was Department of State(DOS)/OIG/Investigations,
Assistant Special Agent in Charge [REDACTED]
[REDACTED]

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After being advised of the identity of the interviewing Agent and the
nature of the interview, [REDACTED] provided the following information:

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[REDACTED]

[REDACTED]

[REDACTED]

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At the meeting, [REDACTED] told the group that TORRES AES was
trying to obtain the gun permits and said, in substance, that the company

UNCLASSIFIED//~~FOUO~~Investigation on 04/20/2015 at [REDACTED]File # 205-HQ-6117076Date drafted 04/21/2015

by [REDACTED]

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205-HQ-6117076

Continuation of FD-302 of Interview of [REDACTED]

, On 04/20/2015 , Page 2 of 2

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[REDACTED]

[REDACTED] stated that it was an open question as to how TORRES AES obtained the guns in the first instance when there were purportedly no guns available in [REDACTED] at that time.

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[REDACTED]

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✓

4/20/15

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[Redacted]

ustg.

[Redacted]

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[Redacted]

where permits are obtained.

[Redacted]

initial K.
No guns were
allowed. US company

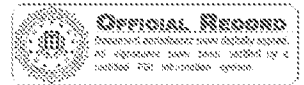
Would never let them have permits -
> questions regarding how T obtained
guns when there were no guns in
country.

[Redacted]

[Redacted]

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[Redacted]

UNCLASSIFIED//~~FOUO~~

FEDERAL BUREAU OF INVESTIGATION

Date of entry 05/15/2015

On 04/20/2015 [redacted] DOB: [redacted]
telephone [redacted] Also present for the
interview was Department of State (DOS)/OIG/Investigations, Assistant
Special Agent in Charge [redacted]
[redacted]

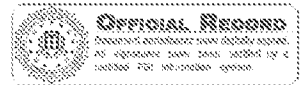
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After being advised of the identity of the interviewing Agent and the
nature of the interview, [redacted] provided the following information:

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b7Cb6
b7CUNCLASSIFIED//~~FOUO~~Investigation on 04/20/2015 at [redacted]File # 205-HQ-6117076Date drafted 04/29/2015

by [redacted]

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UNCLASSIFIED//~~FOUO~~

FEDERAL BUREAU OF INVESTIGATION

Date of entry 05/15/2015

On 04/17/2015, [REDACTED]

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[REDACTED] was interviewed in

[REDACTED] Also present for the interview was Department of
State(DOS)/OIG/Investigations, Assistant Special Agent in Charge [REDACTED]
[REDACTED]After being advised of the identity of the interviewing Agent and the
nature of the interview, [REDACTED] provided the following information:b6
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[REDACTED]

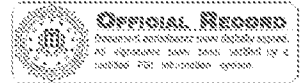
[REDACTED]

[REDACTED]

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b7CUNCLASSIFIED//~~FOUO~~Investigation on 04/17/2015 at [REDACTED]File # 205-HQ-6117076Date drafted 05/01/2015

by [REDACTED]

b6
b7C

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FEDERAL BUREAU OF INVESTIGATION

Date of entry 05/19/2015

On 03/10/2015, [redacted] (Protect Identity), Date of Birth [redacted]
[redacted] was interviewed [redacted] Also present for the interview was [redacted]
[redacted] Assistant Special Agent in Charge [redacted]
[redacted] Department of State/Office of Inspector General
/Office of Investigations to discuss the allegations regarding [redacted]
[redacted] ASAC
[redacted] was also present for this interview. The purpose of the
re-interview [redacted] was to clarify portions of information provided by
[redacted]

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[redacted] had been interviewed previously. Those statements will not be
repeated in this report unless required for the context of the statements.

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After being advised of the identity of the interviewing Agent and the
nature of the interview, [redacted] provided the following information:

TORRES AESb6
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b7DUNCLASSIFIED//~~FOUO~~

Investigation on 03/10/2015 at [redacted]
File # 205-HQ-6117076 Date drafted 03/10/2015
by [redacted]

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Physical 1A/1C Cover Sheet for Serial Export

Created From: 205-WF-6804950

Serial 16

Package:

1A17

Stored Location:

None

Summary:

(U//~~FOUO~~)

Acquired By:

Acquired On:

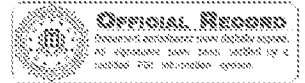
2015-04-27

Attachment:

(U//~~FOUO~~)

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**FEDERAL BUREAU OF INVESTIGATION****Electronic Communication****Title:** (U) Request for Country Clearance [REDACTED]**Date:** 05/19/2015**CC:** [REDACTED]b6
b7C
b7E**From:** CRIMINAL INVESTIGATIVE

D6-ICU

Contact: [REDACTED]**Approved By:** UC [REDACTED]

SC SALLET JEFFREY S

Drafted By: [REDACTED]**Case ID #:** [REDACTED]

205-HQ-6117076

(U) [REDACTED]

Torres Advanced Enterprise Solutions;
FCPAb6
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b7E

Synopsis: (U) To document a request for clearance passage for operational travel for SSA [REDACTED] Travel is planned for 5/22/2015 through 5/30/2015.

Enclosure(s): Enclosed are the following items:

1. (U) Clearance Passage Worksheet

Details:**Purpose of Travel:**

The Criminal Division (CID)/International Corruption Unit (ICU)

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Title: (U) Request for Country Clearance [REDACTED]

Re: [REDACTED] 05/19/2015

requests Country Clearance (CC) and travel authorization for ICU SSA [REDACTED] for operational travel to [REDACTED] Travel is planned for 5/22/2015 through 5/30/2015.

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b7EPurpose of Travel:

(U) International Corruption Unit (ICU) SSA [REDACTED] will be traveling to [REDACTED] to meet with the RSO and Legat to conduct interviews of individuals familiar with [REDACTED] and the [REDACTED] contract with the US Embassy.

(U//~~FOUO~~) Torres Advanced Enterprise Solutions (AES), based in Falls Church Virginia, provides security services, language services, and information technology services to governmental and non-governmental agencies. Torres AES currently holds the U.S. Department of State local guard force (LGF) contracts in Peru, Argentina, Paraguay, and Panama. [REDACTED]

b7D

(U//~~FOUO~~) In February 2015, the FBI initiated a joint investigation with Department of State. FBI SSA [REDACTED]

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Title: (U) Request for Country Clearance [REDACTED]

Re: [REDACTED] 05/19/2015

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[REDACTED]

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1.

2.

3.

[REDACTED]

Traveler's personal data is as follows:

NAME:

[REDACTED]

DIVISION/FIELD OFFICE: FBIHQ/CID/PCCRS/ICU

TITLE: SUPERVISORY SPECIAL AGENT

DATE OF BIRTH:

[REDACTED]

PLACE OF BIRTH:

[REDACTED]

SSAN#:

[REDACTED]

PASSPORT #:

[REDACTED]

ISSUE DATE: 10/01/2010

EXPIRATION DATE: 09/30/2015

TRAVEL ITINERARY: 5/22/2015 - 5/30/2015

CURRENT CLEARANCE/ACCESS: TS/SCI

PRIMARY PHONE NUMBER:

[REDACTED]

(M)

(D)

EMAIL ADDRESS:

[REDACTED]

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DO YOU NEED THE LEGAT OFFICE TO COORDINATE ACCOMMODATIONS?

No.

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Title: (U) Request for Country Clearance

Re: 05/19/2015

Budget Information:

Name of Traveler:

Dates of Travel: 5/22/2015 - 5/30/2015

Specific Destination:

Overall Initiative: FCPA

Approved Dollar Amount for Trip: All expenses paid by the ICU.

Rental Car Authorized for Reimbursement: Yes.

TR# for FCPA: 5R5J31506003

Fund Code: SEWX

Agreement #: 15XX-RA9578H

Line #: N/A

BBFY: 2015

The above information is approved by: ICU Unit Chief.

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Unclassified

Clearance Passage Worksheet

DATE OF REQUEST: <u>5/18/2015</u>				
NAME OF REQUESTOR: <input type="text"/>				
TELEPHONE/EXTENSION: <input type="text"/>		BUILDING/ROOM <input type="text"/>		
REQUESTOR'S DIVISION: <u>CID</u>				
AGENCY TO BE VISITED: <input type="text"/>				
OFFICIAL BUREAU NAME	SSN	DATE OF BIRTH	PLACE OF BIRTH CITY STATE	
<input type="text"/>				
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
CLEARANCE TO BE PASSED: <u>TS</u>				
ACCESS(ES) TO BE PASSED: <u>SCI</u>				
BEGINNING DATE: <u>5/22/2015</u>		END DATE: <u>5/30/2015</u>		
PURPOSE: <u>For operational travel to</u> <input type="text"/>				
SPONSOR/POINT OF CONTACT (POC): SSA <input type="text"/>		SECURITY POC: _____		
POC PHONE: <input type="text"/>		SECURITY POC PHONE: _____		
POC FAX NUMBER: _____		SECURITY POC FAX: _____		
POC OFFICE SYMBOL/PLA: _____				

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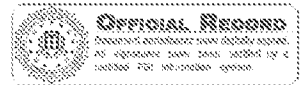
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TO BE COMPLETED BY CPSU PERSONNEL ONLY

AGENCY PASSED TO: _____	RECEIVER: _____
DATE/TIME: _____	COMMUNICATION NEEDED: Yes <input type="checkbox"/> No <input type="checkbox"/>

CLASSIFICATION
Unclassified

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION****Electronic Communication****Title:** (U) Request for Country Clearance [REDACTED]**Date:** 05/20/2015**CC:** [REDACTED]**From:** SANTIAGO**Contact:** [REDACTED]**Approved By:** [REDACTED]**Drafted By:** [REDACTED]**Case ID #:**

205-HQ-6117076

(U) [REDACTED]

Torres Advanced Enterprise Solutions;
FCPA

Synopsis: (U) To grant country clearance for operational travel for SSA [REDACTED] Travel is planned for 5/22/2015 through 5/30/2015.

Details:

[REDACTED] grants Country Clearance and travel authorization for ICU SSA [REDACTED] for operational travel to [REDACTED] Travel is planned for 5/22/2015 through 5/30/2015. The purpose of this travel is for SA [REDACTED] to meet with the RSO and Legat to conduct interviews of individuals familiar with [REDACTED] and the [REDACTED] contract with the US Embassy.

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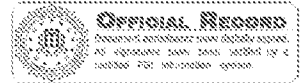
Title: (U) Request for Country Clearance - [REDACTED]

Re: [REDACTED] 05/20/2015

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FEDERAL BUREAU OF INVESTIGATION

Date of entry 06/02/2015

On 04/17/2015, [redacted] DOB: [redacted] telephone [redacted] was interviewed in [redacted]. Also present for the interview was Department of State (DOS) /OIG/Investigations, [redacted] Assistant Special Agent in Charge [redacted]. After being advised of the identity of the interviewing Agent and the nature of the interview, [redacted] provided the following information:

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[redacted] provided the following information:

[Redacted content]

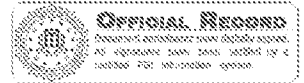
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[Redacted content]

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b7CUNCLASSIFIED//~~FOUO~~Investigation on 04/17/2015 at [redacted]File # 205-HQ-6117076Date drafted 04/21/2015

by [redacted]

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b7C

UNCLASSIFIED//~~FOUO~~

FEDERAL BUREAU OF INVESTIGATION

Date of entry 06/29/2015

On 05/28/2015, [REDACTED]
[REDACTED] e-mail [REDACTED] was interviewed
in [REDACTED] Also present for the interview was Department of
State(DOS)/OIG/Investigations, Assistant Special Agent in Charge [REDACTED]
[REDACTED] After being advised of the
identity of the interviewing Agent and the nature of the interview, [REDACTED]
provided the following information:

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[REDACTED] stated that the U.S. Embassy local guard force (LGF) contractor,
currently TORRES, is responsible for obtaining weapons licenses for the
guard force and that the process is different for guards verses Embassy
diplomats. One difference is that guards are require to pass a training
test and have documentation certifying the training.

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Approximately one year ago, [REDACTED]
[REDACTED]
[REDACTED]

UNCLASSIFIED//~~FOUO~~Investigation on 05/28/2015 at [REDACTED]File # 205-HQ-6117076Date drafted 06/02/2015

by [REDACTED]

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205-HQ-6117076

Continuation of FD-302 of Interview of [REDACTED], On 05/28/2015, Page 3 of 3

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[REDACTED] also provided documents related to the Torres contract, such as the Undisbursed Voucher Detail Report, Invoices, Torres contract Amendment, requisition documents, and two hand drawn organizational charts depicting [REDACTED] recollection of the SUCAMEC organization structure under General [REDACTED] (2012 -2013) and then [REDACTED] (7/2013). All documents provided by [REDACTED] are attached to this report.

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Physical 1A/1C Cover Sheet for Serial Export

Created From: 205-WF-6804950
Serial 22

Package: 1A26

Stored Location: None

Summary: (U//~~FOUO~~) notes of
interview, SUCAMEC Org
Charts., email from [REDACTED]
regarding SUCAMEC and
[REDACTED] contract
documents

Acquired By: [REDACTED]

Acquired On: 2015-06-24

Attachment: (U//~~FOUO~~) notes of
interview, SUCAMEC Org
Charts., email from [REDACTED]
regarding SUCAMEC and
[REDACTED] contract
documents

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FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1385180-0

Total Deleted Page(s) = 36

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