

REPLY TO:

SMITHCURRIE

SARAH K. CARPENTER

ATTORNEY AT LAW
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November 11, 2020

Stephanie Carr
Chief
Office of the Secretary of Defense and Joint Staff (OSD/JS)
FOIA Requester Service Center
Defense Freedom of Information Center
1155 Defense Pentagon
Washington, DC 20301-1155

RE: Freedom of Information Act (“FOIA”) Request

Dear Sir or Madam:

This is a request under the Freedom of Information Act, 5 U.S.C. § 552. I request that a copy of the following documents be provided to me:

1. All contracts between the United States, acting by and through the Defense Human Resources Activity, 480 Mark Center Drive, Alexandria, VA, and Robert D. Niehaus, Inc. (“RDN”), 140 E. Carillo Street, Santa Barbara, CA 93191-2111 (Commercial and Government Entity Code No.: 0CXJ5), from January 1, 2016 through November 9, 2020 including, without limitation, Contract No. H9821018D0001, H9821020F0001, H9821018F0002, H9821019F0007, H9821018F0221. This includes all amendments and modifications to such contracts.
2. All solicitations or purchase requests, including all amendments thereto, between August 14, 2012 and November 9, 2020, issued by the Defense Human Resource Activity to which RDN submitted a bid or proposal including, without limitation H9821017R0016. This request does not seek bid or proposal pricing from RDN or other bidders; instead, it only seeks copies of the actual solicitation(s).
3. All bids or proposals, excluding pricing, submitted by RDN to the Defense Human Resource Activity from August 14, 2012 to November 9, 2020 including specifically, but without limitation, any bid or proposal submitted in response to H9821017R0016.



SMITHCURRIE.COM

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1025 CONNECTICUT AVE NW
WASHINGTON, DC 20036

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Civil Case No.: 1:21-cv-00394

Exhibit K

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4. All rental housing data collected and furnished by RDN to the Defense Travel Management Office (“DTMO”) and/or Military Housing Offices (“MHOs”) for the years 2016, 2017, 2018, 2019, and 2020 for Military Housing Area (“MHA”) NJ 204 BAH. This includes all updates to such data collection. For purposes of this FOIA request, the “MHA NJ 204 BAH” means the Basic Allowance for Housing (“BAH”) for each category of military service member and qualified non-service member and each type of housing unit related to each for MHA NJ 204. For purposes of this FOIA request, “rental housing data” includes without limitation, data, reports, tables, maps, surveys, samples, MHA maps, Effective Market Areas data and maps, BAH collection timelines, Approved Units lists, rental unit listings, newspaper listings, multiple listing service (“MLS”) listings and/or summaries, property listings, rental housing referrals, rental unit summary tables, summary and rental listing reports, housing profiles, anchor points, regional reports, list of characteristics of unsuitable/inappropriate units, rent estimates, unit size guidelines, housing standards tables, MHA boundaries, census track exclusion summaries, site visit request forms and reports, and materials evidencing verification of rental housing data including RDN Verification and Flag Review decisions.
5. All rental housing data collected and furnished by DTMO and/or MHOs to RDN for the years 2016, 2017, 2018, 2019, and 2020 for MHA NJ 204. This includes all updates to such data collection.
6. All rental housing data relied upon in calculating the weighted average BAH and pro forma BAH for the years 2016, 2017, 2018, 2019, and 2020 for MHA NJ 204. This includes all updates to such data collection.
7. Correspondence by and between DTMO, MHOs, and/or RDN from January 1, 2016 to November 9, 2020 regarding rental housing data and/or the data collection for the MHA NJ 204 BAH.
8. All BAH Primers for the years of 2016, 2017, 2018, 2019, and 2020.
9. All data collection plans and/or guides prepared by RDN and submitted to DTMO for the years of 2016, 2017, 2018, 2019, and 2020.
10. All training materials for BAH data collection prepared by RDN and submitted to DTMO for the years of 2016, 2017, 2018, 2019, and 2020 including, without limitation, plans, guides, and briefs.
11. All documents memorializing RDN’s, DTMO’s, and/or MHOs’ analysis of the rental housing data and information requested by this FOIA Request.

In order to help you determine my status for the purpose of assessing fees, you should know that I am affiliated with a private business and am seeking information for use in the company’s business. I am willing to pay fees for this request up to a maximum of \$1,000. If you estimate that the fees will exceed this limit, please inform me first.

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I also include in the Reply To section of this letter (above) a telephone number at which I can be contacted if necessary to discuss any aspect of my request.

Sincerely,

SMITH, CURRIE & HANCOCK LLP

A handwritten signature in blue ink that reads "Sarah Carpenter". The signature is written in a cursive, flowing style.

Sarah K. Carpenter