Case 1:22-cv-00101 Document 1-12 Filed 01/14/22 Page 1 of 3

Law Offices of David P. Sheldon, PLLC

David P. Sheldon - Admitted in DC, MD & MT
Tami L. Mitchell - Admitted in CO & WI
Corey D. Bean - Admitted in MD
Shannon M. James - Admitted in AZ
James J. McNally - Admitted in DC
Natasha K. Campbell - Admitted in WA

June 25, 2020

SECNAV DON CIO 1000 Navy Pentagon Washington, DC 20350-1000

SENT BY EMAIL TO: donfoia-pa@navy.mil

RE: FOIA/PA Request-Expedited

Dear Sir/Ma'am:

My office represents Captain Terry Morris, USN, DOB ****** SS # XXX-XX-****. On CAPT Morris's behalf and under the Freedom of Information Act (FOIA), 5 U.S.C. § 552(a), and the Privacy Act, 5 U.S.C. § 552a, I am requesting a copy of any and all documents the Navy maintains on CAPT Morris, including but not limited to, any investigations into alleged misconduct, and all documentation sent or received regarding CAPT Morris to and/or from the following offices between October 2015-July 2018:

Chief of Naval Operations
Secretary of the Navy
Vice Chief of Naval Operations
Naval District Washington
Naval Personnel Command
Assistant Secretary of the Navy (Manpower and Reserve Affairs)
Under Secretary of Defense for Personnel and Readiness
Director of Navy Staff
Naval Personnel Command

I am also requesting a copy of any and all documents the Navy maintains on CAPT Morris which were sent or received to and/or from the following personnel between October 2015-July 2018:

Maria Kurta-Civ
Anthony Kurta-Civ
Estella Murcia-Civ
Maren Leed-Civ
Susan Adams-Civ
CAPT Sam Paparo
CAPT Will Triplett
CAPT John Springett
CAPT Sharon Ruest
LCDR James Raymond
CDR Christopher Mullen
LCDR Shelby Nikitin
CDR Curt Larson
RDML Johnny Wolfe
RDML Moises Deltoro

RDML Francis Morley

The word "document" as used in this request, is intended to have the broadest possible meaning, to include all notes, memoranda, e-mails and other electronic messages, audio or videotape recordings, and any other data compilations, in whatever form.

We will pay for fees and costs up to \$250 for any reproduction entailed in obtaining these documents. I respectfully request a response within 20 days, as provided for by the FOIA. As provided for under FOIA, I am requesting that you waive fees for my client. I have also enclosed a release that authorizes you to release the documents to me. Please expedite this request.

We are requesting an expedited response as the documents are required to respond to a BCNR Advisory Opinion.

If you have questions about this request, please contact me directly me at (202) 546-9575 or by email at davidsheldon@militarydefense.com. Thank you.

Sincerely,

David P. Sheldon
David P. Sheldon, Esq.

Enclosure

AUTHORIZATION FOR RELEASE OF RECORDS AND INFORMATION

DIRECTED TO:

I, CAPT Terry S. Morris, SSN 264-89-2199, DOB May 07,1965, hereby authorize David P. Sheldon, Esq., or his representative to obtain copies of any and all records and information in the possession of the above entity or its associated entities relating to me. Such records should be released immediately upon request by the above named person or his representative. This Authorization to Release Records and Information is to remain in effect until such time as I revoke it in writing.

Under 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 22, 2018.

Terry S. Morris