

Exhibit 1



May 20, 2022

FBI Records Information Dissemination Section
Attn: FOIPA request
170 Marcel Drive
Winchester, VA 22602-4843

SENT CERTIFIED MAIL/RETURN RECEIPT REQUESTED MAIL
7018 2290 0000 7703 2006

RE: Freedom of Information Act (FOIA) Request of John Christian Wilson

Dear Federal Bureau of Investigation FOIA Officer,

I, C. Peter Sorenson, am writing on behalf of our law firm's client, John Christian Wilson. Our law firm address is PO Box 10836, Eugene, Oregon 97440 and Mr. Wilson's address is 27 Manns Avenue, Greenwich NSW 2065 Australia. My email address is: peter@sorensonfoialaw.com. My phone number is 541-606-9173.

Mr. Wilson has asked me to represent him on the matter of making this FOIA request. His Declaration authorizing me to make the request is attached.

A. REQUEST

John Christian Wilson requests, pursuant to the Freedom of Information Act (hereafter FOIA):

1) All records, documents, or communications prepared by, received by or maintained by the FBI which mention the following terms:

John Christian Wilson

John C. Wilson

John Wilson

2) All records describing FBI informant or FBI agent contacts with

John Christian Wilson

John C. Wilson

John Wilson

3) All records describing FBI contractors, or others operating on behalf of the FBI or other DOJ element, contacts with

John Christian Wilson

John C. Wilson

John Wilson

4) The 1996 securities analyst report on NYSE listed U.S. mining company Freeport McMoran Copper and Gold Inc (which trades on the NYSE under the symbol FCX) written by John Wilson. This report is entitled, "FCX: Grasberg Closure Highlights Political Risks." Mr. Wilson wrote the report as an analyst working for S.G. Warburg & Co. Inc. and the report was dated March 12, 1996.

5) All records describing the attendance of John Wilson at the Freeport McMoran Copper and Gold Inc. May 1996 annual analyst briefing at Freeport McMoran Copper and Gold Inc's headquarters in New Orleans, Louisiana. In particular, records are sought concerning n interaction between John Wilson and James R. Moffett (known as Jim Bob), CEO and Chairman of Freeport McMoran Copper and Gold Inc, in the boardroom alcove after the analyst question period that was held in Freeport McMoran's boardroom.

6) All records describing an interaction between John Wilson and an unnamed person, apparently a federal agent or FBI operative, also in Freeport's boardroom alcove after the analyst question period in Freeport's boardroom mentioned above at the Freeport headquarters in New Orleans, Louisiana in May 1996.

7) All records describing or documenting interactions between John Wilson and people operating on behalf of the FBI or other DOJ element, in particular by Steve Garber.

8) All records, including notes, recordings or transcripts of interviews, made by Steve Garber in early 1999 during the several days when Mr. Wilson visited Garber at his home in Prescott, AZ.

9) All records, including notes, recordings or transcripts, of a discussion or interview involving Mr. Wilson and Steve Garber in June 2004 in New York, New York.

10) All records, including notes, recordings or transcripts, of a discussion or interview involving Mr. Wilson and Steve Garber in September 2004, including at Tibet House, and also the Blue Water Grill both in the vicinity of the Union Square neighborhood of New York, New York.

11) All records of the attendance involving John Wilson in connection with a presentation that Dave Foreman gave in New York, New York in late 1997. David Foreman (usually referred to as Dave) is a well-known American environmental activist and co-founder of environmental group Earth First! Dave Foreman was a subject of Susan Holmes for her work for the FBI.

12) All records pertaining to John Wilson concerning his attendance, or discussions with Susan Holmes or Dave Foreman on, a raft trip on the Colorado River in July or August 1997 with journalists, including a reporter for Time Magazine, Ms. Holmes and Mr. Foreman.

13) All records of discussions between John Wilson and Susan Ackerson Holmes. All records describing or documenting interactions between John Wilson and people operating on behalf of the FBI or other DOJ element, in particular Susan Ackerson Holmes.

14) All records of discussions between John Wilson and Susan Holmes during the three years that they dated in New York, New York, calendar years 1994, 1995, 1996 and 1997.

15) All records of discussions between John Wilson and Susan Holmes in a May 10, 2003 (on or about) dinner conversation between Susan Holmes and John Wilson in New York, New York.

16) All telephone wiretaps on telephones used by John Wilson.

17) All records showing any applications for surveillance or wiretaps of telephones used by John Wilson.

18) All records showing any applications for search warrants for properties owned or leased by John Wilson.

19) All records showing any applications for surveillance of John Wilson.

B. TIME FRAME OF THIS REQUEST

The time frame for this request includes records created or received on or after January 1, 1994 to present.

C. INFORMATION HELPFUL TO THE FBI IN FULFILLING THIS REQUEST

My client, John Christian Wilson, was a securities expert and was based in New York, New York. His work was involved in international mining finance, with a focus on equity research. He later worked in Australia, where he now lives.

My client has signed DOJ Form 361 and has signed a Declaration of John Christian Wilson. These documents are attached to and made part of this request.

Mr. Wilson was working for S.G. Warburg & Co. in 1996. He wrote a report "FCX: Grasberg Closure Highlights Political Risks" The report was dated March 12, 1996.

As part of Mr. Wilson's request, records about his analyst report March 12, 1996 on U.S. mining company Freeport McMoran Copper and Gold Inc and attendance at Freeport's annual analyst briefing in New Orleans in May 1996 are pertinent. Mr. Wilson was a securities analyst in 1996. As part of his duties, he traveled from New York to New Orleans to attend the annual analysts briefing of Freeport McMoran Copper and Gold Inc. The meeting was held in May 1996. Mr. Wilson asked, during the analyst question time, a question of Jim Bob Moffet, Freeport McMoran's Chairman and CEO. The question was about the next phase of the U.S. State Department's investigation into Freeport, following eyewitness allegations the company was involved in the killing of indigenous protestors and other human rights violations in the vicinity of its massive copper and gold mine, the Grasberg mine, in West Papua, Indonesia. Mr. Wilson alluded to a recent New York Times article that stated that an interim report had been completed by the State Department, although it had not been publicly released. Jim Bob Moffett acknowledged the existence of the State Department investigation into the company and completion of the interim report. Mr. Wilson asked the CEO of Freeport McMoran, "What can investors expect?" After the meeting a shadowy figure who had been sitting among the analysts but whom Mr. Wilson did not recall having ever seen before and did not know, approached Mr. Wilson and suggested he not ask more questions on this subject and threatened him.

Mr. Wilson visited Steve Garber early in 1999 in Prescott, AZ. Mr. Wilson believes, by Mr. Garber's own admission, and as attested by Susan Holmes, that Mr. Garber worked for the FBI as an undercover operative, co-operating with the FBI in some capacity such as an FBI contractor, informant or in some other capacity. Mr. Wilson wants records from the report or recording that may have been made.

Mr. Wilson visited New York, New York in June 2004. He went on a long walk, through Central Park and the Upper West Side with Steve Garber. During this time Mr. Wilson said Steve Garber strongly insinuated that Mr. Wilson had been targeted by the FBI on account of Mr. Wilson's 1996 analyst report. Mr. Garber revealed many things that he knew about Mr. Wilson's background, from his own sources.

Mr. Wilson visited New York in September 2004. He again met with Steve Garber, this time at Tibet House and they walked to the Blue Water Grill, a restaurant in the Union Square neighborhood of New York, New York. Mr. Garber confirmed in this discussion that he worked for the FBI and that Mr. Wilson was being targeted for the report that Mr. Wilson published on Freeport McMoran Copper and Gold Inc. Mr. Wilson asked Mr. Garber if the FBI was responsible for the attack (comprising aggressive intrusions and interference in Mr. Wilson's life) on Mr. Wilson and Mr. Garber said yes. Mr. Garber said he occasionally did this type of work for the FBI and would likely deny the existence of his work.

On around ten or more occasions, from 1994 to 1997, the period in which Holmes and Wilson dated, Holmes informed Wilson that she worked for the FBI and several times discussed in extensive detail her background work for the FBI, including but not limited to her role, training, and past operations. Mr. Wilson was present or accompanied her on several FBI related undertakings. Some of these details are described below.

On several occasions, Holmes asked Mr. Wilson to accompany her on trips and to social gatherings that she later informed him had been part of her FBI assignments. One involved an unofficial Sierra Club volunteers after work drinks gathering around 1995-6 in a restaurant in NYC with a Montana tree spiking suspect James B. who was subsequently prosecuted, and at which a number of other undercover FBI agents were present.

Holmes showed Mr. Wilson her FBI wire device used for covert recording, with two leads, one running over each shoulder and joining at the front. She used this on the above gathering with a suspected tree spiker from Missoula, Montana visiting NYC around 1995-96.

Holmes told Wilson that she had received firearms training from the FBI, that she had an FBI issued handgun that she kept in her apartment, and that she regularly attended FBI training programs at Quantico.

Holmes showed Wilson several T-shirts and other clothing items bearing the FBI's initials in large letters at her New York City apartment in and around 1997.

Holmes told Wilson several times between 1994 and 1997 that she focused on eco-extremists for the FBI in the eastern half of the U.S.A. She said she was not directly involved with the western half and its handling of the Unabomber case, a high-profile case that had been successfully closed in 1996 with the arrest of Ted Kaczynski in Montana, though on occasion she had discussed the matter in general terms with him or in his presence with others, mainly her FBI peers.

During 1994 to 1997, the period in which Holmes and Wilson dated, Holmes disclosed and discussed at least two of her FBI work targets. One was Dave Foreman, founder of the Wildlands Network and co-founder of Earth First! who is a high-profile environmentalist and author. The other was Paul Winter, who performs the annual winter solstice concert at The Cathedral of St John the Divine in NYC, which at Holmes invitation, they used to attend annually. Holmes said Winter had been a student environmental activist and leader years before at college. Ms. Holmes invited Mr. Wilson to a presentation by Dave Foreman in New York, New York. This presentation was made in 1997. Mr. Wilson had no contact or association with any of these individuals on any occasion who were subjects of Holmes FBI work, other than through Ms. Holmes FBI work.

Mr. Wilson, in 1997, went on a rafting trip on the Colorado River, with Ms. Susan Holmes. Holmes was Mr. Wilson's girlfriend at the time, and introduced Mr. Wilson to Dave Foreman, a famous environmental activist and, a onetime person of interest to the FBI and subject of Holmes' work. There were about 20 or so people on the raft trip. Journalists were part of the rafting party, including a reporter from Time Magazine. Mr. Wilson had been invited by Holmes on the pretext everyone's partners were invited to attend. However, Mr. Wilson was surprised to find later when he arrived for the trip that of all the participants, he was the only domestic partner invited. The trip organizers arranged to have Mr. Wilson placed in the same raft with Mr. Foreman.

Mr. Wilson has had a lot of contact with persons who were aware of many of his private personal details and appeared to be undercover FBI agents. His former girlfriend, Susan Holmes, told Mr. Wilson that she worked as an undercover agent. She showed Mr. Wilson her black FBI identification card. She apparently said she was not an employee or a special agent of the agency. Rather her work for the FBI was on a contract basis more akin to an independent contractor. She told Mr. Wilson that the color of the ID card was significant, hers being black, whereas the regular day to day FBI employees have white background ID cards. Depending on her work capacity for the FBI, this may have some bearing as to which of the FBI databases the information is held in and that should be searched.

On or around Saturday, May 10th, 2003, Susan Holmes subjected Mr. Wilson to a series of intense questioning at Cafe Fiorello, 1900 Broadway, in New York City. During the roughly two and a half hours, Holmes acknowledged to Mr. Wilson that she was undertaking an interview at the behest of a U.S. government agency. During the interview, Holmes detailed a myriad of specific details of Mr. Wilson's life spanning many decades, continents, and people. These details included but were not limited to information regarding: personal conversations of Wilson's with current and former peers and colleagues going back decades; content of phone calls Mr. Wilson had had on his private home phone; minor traffic offenses incurred in Australia; work records from various companies Mr. Wilson had worked at over the years; records of school and university grades; records of purchases; records of state tests; medical history; and camping records at US national parks. During the interview, Holmes also asked a large number of questions about Mr. Wilson's background, family members, contacts and opinions including seeking information on any crimes or misdemeanors – a systematic interrogation. Of all the analyst reports that Mr. Wilson had published over the years, the only one she asked about was concerning Freeport McMoran published 12 March 1996. Ms. Holmes asked if Mr. Wilson remembered the report on Freeport McMoran he had published about the killings, the threat that Mr. Wilson received in the boardroom alcove, the state department investigation, and loss of OPIC political risk insurance and subsequent interactions experienced by Mr. Wilson in relation to the report and analyst meeting.

D. HOW RESPONSIVE RECORDS SHOULD BE PROVIDED

My client requests copies of the responsive records for this FOIA request be provided in a digital format, either via email, or stored on a thumb drive, CD or other electronic data storage device. See 5 U.S.C. §552 (a)(3) B). Providing these records in an electronic format will save agency

staff processing time, as well as reducing the cost of making paper copies of all responsive records.

E. PROCESSING FEES

My client is pre-authorizing payments up to \$30 for the processing of this request but only if the FBI complies with all statutory deadlines in FOIA. Congress amended FOIA in 2007. An effect of the 2007 Amendments was to impose consequences on agencies that fail to comport with FOIA's requirements. See S.Rep. No. 110-59. To underscore Congress's belief in the importance of the statutory time limit, the 2007 Amendments declare that "[a]n agency shall not assess search fees ... if the agency fails to comply with any time limit" of FOIA. § 552(a)(4)(A)(viii) (emphasis added). *Bensman v National Park Service*, 806 F.Supp.2d 31 (DCD 2011).

F. POLICY AND LEGAL DIRECTION FOR OPEN GOVERNMENT

Disclosure of the above referenced agency records are also sought in order to promote government transparency, and to reflect the Administration's policy to support our nation's fundamental commitment to open government. As the Supreme Court has observed, "virtually every document generated by an agency is available in one form or another, unless it falls within one of the Act's nine exemptions." *NLRB v. Sears, Roebuck & Co.*, 421 U.S. 132, 136 (1975). FOIA was designed to "pierce the veil of administrative secrecy and to open agency action to the light of public scrutiny," see, e.g., *Dept. of the Air Force v. Rose*, 425 U.S. 352, 361 (1976), and in order "to ensure an informed citizenry, vital to the functioning of a democratic society, needed to check against corruption and to hold the governors accountable to the governed." *NLRB v. Robbins Tire & Rubber Co.*, 437 U.S. 214, 242 (1978); see also *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1310 (D.C. Cir. 2003); *United States Dept. of Justice v. Reporters Comm. for Freedom of the Press*, 489 U.S. 749, 773 (1989).

The above-described agency records are subject to disclosure under FOIA, and are not otherwise exempt from disclosure pursuant to FOIA's nine statutory exemptions. See 5 U.S.C. § 552(b)(1) - (9). To the extent that a determination is made by your FOIA office staff that any limited portions of the records listed above will be withheld from disclosure for this request, FOIA expressly requires all agencies to disclose "[a]ny reasonably segregable portion of a record . . . after deletion of the portions of the record which are exempt." 5 U.S.C. §552(b). See, e.g., *Oglesby v. U.S. Dept. of Army*, 79 F.3d 1172, 1178 (D.C. Cir. 1996); see also *Abdelfattah v. U.S. Dept. Of Homeland Security*, 488 F.3d 178, 186-187 (3rd Cir).

The 2007 Openness Promotes Effectiveness in our National Government Act amendments to FOIA (the "OPEN Government Act") requires identification of the amount of any material withheld, the location of any withholdings, a direct reference to the specific statutory exemption supporting each withholdings asserted, and if technically possible, also require that this information shall "be indicated at the place in the record where such deletion is made." See 5 U.S.C. § 552(b). Therefore, I would appreciate your assistance in expressly identifying any exempt responsive records (or portions thereof) and the applicable FOIA exemptions for any responsive materials withheld for this FOIA request.

Please inform my office in writing if there are any “unusual circumstances” that will cause delay in responding to this FOIA request, or providing the records which are requested, and in addition, please provide the approximate date that you anticipate a final response will be provided.

G. AUTHORIZATION

Attached to this request is a Declaration of John Christian Wilson and the DOJ Form 361 signed by John Christian Wilson.

The declaration, in particular, authorizes C. Peter Sorenson and the Sorenson Law Office to make this request and to receive records on behalf of John Christian Wilson. The declaration expressly waives privacy rights – as they may apply to C. Peter Sorenson and the Sorenson Law Office – relating to this FOIA request and any records that the FBI has in response to this request. Furthermore, the declaration establishes that John Christian Wilson is willing and able to sign any forms the agency may require to formalize the waiver of privacy rights to C. Peter Sorenson and the Sorenson Law Office.

H. ESTIMATED DATE OF COMPLETION REQUESTED

The Sorenson Law Office, on behalf of our client, specifically requests the agency to provide an estimated date of completion for this request.

I. CONTACT

Please provide a receipt for this request and provide a tracking number so that we may inquire about the status of this request.

If you have any questions regarding this FOIA request or need help locating documents, or if I can be of any other assistance, please feel free to contact me at (541) 606-9173, or via email to: peter@sorensonfoialaw.com.

Thank you in advance for your assistance.

Best,

C. Peter Sorenson
Sorenson Law Office
PO Box 10836
Eugene, Oregon 97440

Attachments: 1) Declaration of John Christian Wilson; 2) DOJ Form 361 signed by John Christian Wilson.