

**Jerry T. Blackburn
1286 Remus
Kalamazoo, Michigan 49004**

July 19, 2000

VIA FACSIMILE

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Willie Mitchell
United States Postal Inspection Service
Michiana Division
Division Headquarters
Post Office Box 330119
Detroit, Michigan 48232-6119

Re: Denise P. Blackburn
1286 Remus
Kalamazoo, Michigan 49004
Social Security No. 375-58-0626

Dear Mr. Mitchell:

This letter is being written for and on behalf of Denise P. Blackburn, my wife, who has provided me with a Durable Power of Attorney, a copy of which is enclosed.

For the period from January 1, 1991 to and including the date of the last production of records made pursuant to this request under the Freedom of Information Act (FOIA), 5 U.S.C. § 552, and applicable amendments thereto and implementing regulations, and the Privacy Act, 5 U.S.C. § 552a, and applicable amendments thereto and implementing regulations, this letter is to request copies of all records in the care, custody or control of the United States Postal Inspection Service that may in any way relate to Denise P. Blackburn. Her social security number is 375-58-0626, and her date of birth is May 29, 1952.

So that there is no misunderstanding, these records shall include but not be limited to:

1. Any and all records in support of the statement made by Brett M. Schwartz in a letter, dated May 18, 2000, a copy of which is enclosed, to Robert M. Sullivan:

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Our investigation indicates in reviewing Ms. Blackburn's medical information as compared to video surveillance and observation there appears to be numerous inconsistencies between her stated inabilities and her observed physical activities.

2. Any and all records in support of the Investigative Memorandum signed by Brett M. Schwartz, dated May 18, 2000, a copy of which is enclosed, concerning Denise P. Blackburn.
3. Any and all records relating to Case No. 902-1311464FWC(1);
4. Any and all records relating to Case No. A9-361981;
5. Any and all photographs, undeveloped photographs, and video tapes (including the audio portions thereof), portions of video tapes edited out (including the audio portions thereof);
6. Records of any communications with the U.S. Department of Labor or any entity or individuals associated with the U.S. Department of Labor, including but not limited to:
 - 1.) Office of Workers' Compensation Programs;
 - 2) Robert M. Sullivan;
 - 3) Karen R. Spence; and
 - 4) Aimee Brosch;
7. Records of any communications with Mr. John Rideout or anyone associated with his office;
8. Records of any communications with Ms. Helen R. Boberek or anyone associated with her office;
9. Records of any communications with any physicians, including but not limited to Dr. Magdi Gabriel, Dr. John Milcu, Dr. George Fuksa, or their staffs, or both;
10. Records of any communications with anyone else associated with the U.S. Postal Service.
11. Records of any authorization for the surveillance referenced in the Investigative

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regardless of the form in which such record may have been made or kept, and shall include but not be limited to e-mails, photographs, videos, videos with audio, tape recordings, handwritten notes, memoranda, correspondence, records on hard drives or floppy disks, telephone logs and telephone bills. It should be further noted and emphasized that "record" also includes records that have been placed in storage and records maintained by subcontractors, consultants, physicians employed, retained by or under some sort of contract, whether written, verbal or informal, with the United States Postal Inspection Service or any of its subsidiary offices and, in this regard, shall include but not be limited to all responsive records in the care, custody or control of any of the foregoing.

I request that responsive records be produced in their entirety, including all attachments, enclosures and exhibits. In the event that you determine that a record contains material or information that falls within the statutory exemptions to mandatory disclosure, it is requested that such material or information be reviewed for possible discretionary disclosure. Similarly, in the event that you determine that a record contains material or information that falls within the statutory exemptions to mandatory disclosure, it is requested that, in accordance with the provisions of 5 U.S.C. § 552(b), and any other applicable law, that all segregable portions of such records be produced.


Additionally, please provide me with your position as to which exemption you believe covers the material that you are not releasing, your reasons for invoking the exemption in each particular case, and an index of the withheld records. My wife has an urgent need for the requested records, which are for a personal and not a commercial use. Accordingly, pursuant to 5 U.S.C. § 552(a)(6)(A), we request your determination on release within twenty (20) days of receipt of this request.

If you have any questions relative to this request, any inquiries should be directed to our attorney, Stuart H. Deming of Inman Deming LLP, who we have had to retain for the purpose of pursuing my wife's claim and now to secure full access to all of her records. Mr. Deming's address and telephone numbers are as follows:

259 East Michigan Avenue, Suite 406
Kalamazoo, Michigan 49007-5902
(616) 382-8080/(616) 382-8083 - Fax
(202) 347-6800/(202) 347-6013 - Fax

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Sincerely,


Jerry T. Blackburn

Enclosures

cc: (w/encl.)

Denise P. Blackburn
Stuart H. Deming, Esq.

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and conditions as my said attorney shall deem best; and to execute any and all listing agreements, deed, contracts of sale, bills of sale, assignments, leases, options, land contracts, or any other papers or documents necessary or desirable in connection therewith.

5. To invest and reinvest any money belonging to me in any property, real or personal, of any kind whatsoever, and on such terms, prices, covenants and conditions as my said attorney shall deem best.

6. To borrow from time to time for my benefit from any bank or anyone else, and to secure the loan or loans by mortgage on any real estate which I may own, the pledge of any