

FILED

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

2023 SEP -6 A 8:48

NICHOLAS HARRISON, et al.,

Plaintiffs,

v.

LLOYD J. AUSTIN, Secretary of Defense,  
et al.,

Defendants.

Civil Action No. 1:18-cv-641  
(LMB/IDD)

**PLAINTIFF'S REPLY TO DEFENDANTS' OPPOSITION  
TO MOTION TO SHOW CAUSE**

**COMES NOW**, Plaintiff, Nicholas Harrison, to offer this Reply to Defendant's Opposition to the Motion for an Order to Show Cause against the Defendants, and in support thereof alleges and states as follows:

**I. The Defendants are not in compliance with the Court's order.**

Contrary to the arguments raised by the Defendants, they are not in compliance with this Court's order. The Court directed that the military must reconsider Plaintiff's application, which inherently means that all accompanying rights and privileges linked to the appointment must be accorded to Plaintiff. The Court should not be required to specify each and every administrative step that the Defendants must take, including modifications to IPPS, DEERS, CAC, DCC, and JAOBC systems. Defendants' failure to make these reasonable inferences, and

instead claim ignorance by arguing, "But, you said nothing about...", is tantamount to contempt for this Court's order.

**II. The Plaintiff has been harmed.**

The Court has already addressed and rejected Defendants' assertions that the Plaintiff has not suffered any damage. To reiterate, the delay in Plaintiff's commissioning has resulted in a delay in his eligibility for subsequent promotion, an issue acknowledged by this Court at the last hearing (ECF No. 401 at 5). The Defendants have not made satisfactory arrangements for Plaintiff's training courses, thus further delaying his promotion eligibility. This delay violates the Court's previous findings and exacerbates the Plaintiff's ongoing harm.

**III. The Defendants are trying to get around the Court's injunction.**

The Defendants have not offered clear assurances that they are complying with the spirit of the Court's injunction, especially in relation to AR 27-1, Paragraph 7-9. This absence of clarity presents a substantial risk of ongoing harm to the Plaintiff and undermines the Court's directive. Despite the Plaintiff's proactive stance, the Defendants have been slow to act and have not presented reasonable alternatives. Importantly, the Plaintiff has expressed a willingness to accept a waiver for DCC in order to maintain his JAOBC reservation and adhere to the timeline that the Defendants had previously represented to the Court. The Defendants' failure to consider this option or act swiftly further demonstrates their intent to find loopholes in the Court's order.

**IV. The Plaintiff was not offered the chance to drive to Fort Monroe.**

The Defendants claim that the Plaintiff had the option to drive to Fort Monroe, an assertion thoroughly debunked by the Plaintiff's own records and communications. Not only is there an absence of any documented communication from MAJ Strickland offering such an option on August 13, 2023, but the alleged arrangement also falls short on multiple fronts of practicality and reasonableness. The Plaintiff would be incurring personal risk and financial burden in the absence of formal orders, while also being expected to rely solely on the recollection of verbal conversations that were never committed to writing. Moreover, had MAJ Strickland actually communicated with the Plaintiff, he would have known that suggesting the Plaintiff drive to Fort Monroe was not even a viable option. The Plaintiff resides in Washington DC and does not own a vehicle, making the proposition absurd on its face. Exhibits showing the Plaintiff's phone records and emails, which corroborate the absence of any such communication from MAJ Strickland on the stated date, are attached herewith. If MAJ Strickland does not amend his declaration to correct this erroneous claim, the Plaintiff respectfully requests that the Defendants produce MAJ Strickland before the Court for cross-examination.

**V. The Defendants continue to show contempt for the Court's order.**

The systemic failure to provide necessary orders, airline tickets, and course registrations demonstrates that the military is not treating this Court's order with the gravity it demands. Rather than putting forth a coordinated and serious effort to comply, the military appears to be relying on bureaucratic inefficiencies and staffing issues as excuses for its non-compliance. Such behavior shows a

lack of respect for this Court's authority and creates an unacceptable risk of ongoing harm to the Plaintiff. The Defendants' persistent laxity in this matter goes beyond mere inefficiency or understaffing issues; it suggests a willful contempt for this Court's orders. The Court has explicitly charged the Secretary of Defense and the Secretary of the Army with enforcement of its order. This alone warrants immediate and serious action at the highest levels.

**WHEREFORE**, the Plaintiff respectfully requests that this Court grant the Motion to Show Cause, require the named Defendants to appear in person to show cause as to why they should not be held in contempt, and provide all other relief that the Court deems just and proper.

Respectfully Submitted.

*Nicholas A. Harrison*

**Nicholas A. Harrison**  
Plaintiff (DC Bar #1024439)  
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Web: <https://harrison-stein.com/>

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria DIVISION

FILED

2023 SEP -6 A 8:50

Nicholas Harrison, et. al.  
Plaintiff(s),

v.

Civil Action Number: 1:18-cv-611  
(LMB/IDD)

Lloyd Austin, et. al.  
Defendant(s).

LOCAL RULE 83.1(M) CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of Reply.  
(Title of Document)

Nicholas Harrison  
Name of *Pro Se* Party (Print or Type)

Nicholas Harrison  
Signature of *Pro Se* Party

Executed on: 06 Sept 2023 (Date)

OR

The following attorney(s) prepared or assisted me in preparation of \_\_\_\_\_.  
(Title of Document)

\_\_\_\_\_  
(Name of Attorney)

\_\_\_\_\_  
(Address of Attorney)

\_\_\_\_\_  
(Telephone Number of Attorney)  
Prepared, or assisted in the preparation of, this document

\_\_\_\_\_  
(Name of *Pro Se* Party (Print or Type)

\_\_\_\_\_  
Signature of *Pro Se* Party

Executed on: \_\_\_\_\_ (Date)

# **Exhibit 1**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

NICHOLAS HARRISON, et al.,

Plaintiffs,

v.

LLOYD J. AUSTIN, Secretary of Defense, et al.,

Defendants.

Civil Action No. 1:18-cv-641 (LMB/IDD)

**DECLARATION OF NICHOLAS HARRISON**

1. Preliminary Statement: My name is Nicholas Harrison, one of the plaintiffs in Harrison v. Austin. I am over eighteen years of age, I am competent to testify about the information contained in this declaration, and I offer this declaration based on my own actual, personal knowledge.
2. Contradiction to MAJ Strickland's Statement: In his Declaration, MAJ Strickland falsely asserts that he communicated with me on August 13 and offered me the opportunity to drive to Fort Monroe without orders or travel arrangements.
3. Phone Records: I have attached my phone records for the month of August. I am on a Verizon family plan with my domestic partner, Baraq Stein. My number is (202) 297-5057. (Exhibit 2). MAJ Strickland's phone number is (202) 821-7694. There is no record of a call from him on August 13.
4. Last Communication: The last call I received from MAJ Strickland was on August 10, when he gave me coordinating instructions to draw equipment from the Armory the next day. There is no record of any other calls until August 15.

5. **Conversation with LTC Mayo:** The last person I spoke to on August 11 was the DC National Guard's Inspector General, LTC Mayo. His number is (407) 451-1395 and there is a record of an eight-minute call at 4:14 p.m. on August 11. During this call, I was advised that it was unlikely that the situation would be resolved over the weekend due to staffing issues at the USPFO and that it not advisable to travel without official orders.
6. **E-mail Correspondence:** The last e-mail I received from MAJ Strickland was on August 11, forwarding instructions on how to apply for a Government Travel Card (Exhibit 3). I followed up with an email on August 12 but received no response (Exhibit 4).
7. **Attempt to Reach Others in Chain of Command:** I reached out by e-mail to COL Berlin, LTC Collier, and LTC Grandpierre - the Officers in Charge (OICs) of the JAG units that I was billeted with. I received only a single response from LTC Grandpierre on August 11 (Exhibit 5).
8. **Notification of Instructors:** On August 13, I still had not heard anything from my chain of command. Consequently, I reached out to my course instructors, who confirmed that my situation could result in course delays (Exhibit 6).
9. **Unresponsiveness of Command:** I took proactive measures by sending an email to MAJ Strickland, alerting him that the course instructors had informed me I would be moved to another course if I could not obtain official orders and travel arrangements that day. I also warned him of the potential legal repercussions of this failure to act (Exhibit 7). MAJ Strickland did not respond to that e-mail over the weekend.
10. **Impracticality of Travel Proposals:** Had MAJ Strickland actually communicated with the Plaintiff, he would have learned that the suggestion of driving to Fort Monroe is inherently flawed. The Plaintiff resides in Washington, D.C., and does not own a vehicle, rendering the

notion of spontaneously driving to Fort Monroe without official orders impractical and absurd on its face.

11. **Lack of Good Faith on Military's Part:** Despite my repeated attempts to resolve this matter amicably, the military has not taken the Court's orders seriously, neither in terms of organizational nor legal obligations. It also appears to be using AR 27-1, Paragraph 7-9 as a loophole to get around the Court's injunction.
12. **Lack of Assurance for Alternative Courses:** The military has not provided any confirmation that another JAIBC course will be available to meet the training requirements within the mandated twelve-month period following the receipt of my commission. Adding to the uncertainty, I have not even been reenrolled in the next available DCC course scheduled for October 5. The military now stipulates that I must complete a new set of prerequisites, including an Army Combat Fitness Test (ACFT), an update of my height and weight, and another Periodic Health Assessment (PHA). Notably, these requirements cannot be fulfilled until November of 2023, adding further delays to the original timeline that the Defendants had previously represented to the Court. (Exhibit 8)
13. **Impact on Civilian Employment:** Due to the ongoing issues with my National Guard status, I have lost my civilian job and the protections under the Servicemembers' Civil Relief Act do not apply because no official orders were ever issued. In spite of the repercussions resulting from the Defendants' negligence, no one has even confirmed that I can go on Annual Training orders to get these issues sorted out (Exhibit 9).
14. **Failure to Manage Personnel:** The military's apparent inability to manage key personnel in a manner consistent with fundamental military principles raises serious questions about the Defendants' commitment to complying with the Court's orders. According to the Army's first general order, personnel are not typically permitted to desert their posts without proper

relief. The notion that multiple servicemembers would simultaneously be granted extended leaves, thereby incapacitating the DC National Guard from fulfilling its mission training requirements, is in direct contradiction to established military doctrine. Such a scenario would ordinarily be unacceptable and unpermitted. However, the Defendants' actions and lack of corrective measures seem to imply that compliance with the Court's order is not considered important enough to warrant the execution of their responsibilities in a traditional military manner.

15. Conclusion: This pattern of neglect and lack of urgency, especially after ten years of fighting unconstitutional discrimination, reflects a problem that goes beyond just my case and speaks to the military's attitude towards Court's orders and servicemembers' rights.

I declare under penalty of perjury that the foregoing is true and correct and this declaration was executed on September 7, 2023.

Respectfully Submitted.

*Nicholas A. Harrison*

**Nicholas A. Harrison**  
Plaintiff (DC Bar #1024439)  
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E-Mail: [nick@harrison-stein.com](mailto:nick@harrison-stein.com)  
Web: <https://harrison-stein.com/>

# **Exhibit 2**



PO BOX 489  
NEWARK, NJ 07101-0489

Account: 425623101-00001

Invoice: 8547578503

Billing period: Jul 25 - Aug 24, 2023

KEYLINE



BARAQ STEIN  
3200 156TH STREET  
615  
WASHINGTON, DC 20010

Questions about your bill?

verizon.com/support  
800-922-0204

Ways to pay

My Verizon app

You can check your bill easily with the My Verizon app available in App Store or Google Play.

Online

Go to go.vzw.com/bill and sign in to review your bill.

By phone

Simply dial #PMT (#768) on your phone and follow the instructions to pay.

Cash

Go to www.verizon.com/stores to find a Verizon Wireless store near you or find a Check Free Pay or Western Union near you to make a cash payment.

Snapshot of your bill

(details on page 3)

|                            |                 |
|----------------------------|-----------------|
| Balance from last bill     | \$0.00          |
| This month's charges       | \$197.20        |
| <b>Total due on Sep 16</b> | <b>\$197.20</b> |

You have Auto Pay scheduled for Sep 13, 2023.

You'll be charged up to 15% per month (18% per year) on the unpaid balance, or a flat \$7 per month, whichever is greater, if allowed by law in the state of your billing address.



BARAQ STEIN  
3200 156TH STREET  
615  
WASHINGTON, DC 20010

Bill date August 24, 2023  
Account number 425623101-00001  
Invoice number 8547578503

Total Amount Due

Deducted from bank account on 09/13/23  
DO NOT MAIL PAYMENT

**\$197.20**

Please see back for instructions on writing to us.

PO BOX 16810  
NEWARK, NJ 07101-6810



85475785030104256231010000100000019720000000197204



Account: 425623101-00001

Invoice: 8547578503

Billing period: Jul 25 - Aug 24, 2023

### Questions about paying your bill?

Go to [go.vzw.com/support/pay-bill-faqs](http://go.vzw.com/support/pay-bill-faqs) to learn more.

### Address change:

Change your address at [go.vzw.com/changeaddress](http://go.vzw.com/changeaddress).

#### Questions about your bill?

[verizon.com/support](http://verizon.com/support)

800-922-0204

### Important Information:

Many billing questions can be resolved easily online or with the My Verizon App. Customer service can also assist you by phone, chat or in a retail store for billing questions or disputes.

All written communication related to billing disputes and checks tendered as payment in full to a billing dispute must be sent to this below address:

Verizon  
Attn: Correspondence Team

PO Box 15069  
Albany, NY 12212

Select a checkbox that describes how we can help you and include any additional information and include it with your written correspondence.

ong with

month for the total balance due on your account. The check you send will be used to debit 10 days in advance of the payment. You agree to receive all Auto Pay related not alter the terms of your existing Customer Agreement. I agree that Verizon is not orization you must call Verizon. Check with your bank for any charges.

**3. Return this slip with your payment. Do not send a voided check.**



#### Automatic Payment Enrollment for Account: 425623101-00001 BARAQ STEIN

By signing below, you authorize Verizon to electronically debit your bank account each month to setup Automatic Payment. You will be notified each month of the date and amount of the communications electronically. I understand and accept these terms. This agreement does not make Verizon liable for erroneous bill statements or incorrect debits to my account. To withdraw your authorization, you must call Verizon.

**1. Check this box.**      **2. Sign name in box below, as shown on the bill and date.**



In the box below with any written correspondence.

Please select a checkbox that best describes how we can help you and include details

| Payment Verification     | Address Change           | Name Change              | Billing Dispute          | Service Change           | Other                    |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> |

Additional information (for example new address or details on your request)



Account: 425623101-00001

Invoice: 8547578503

Billing period: Jul 25 - Aug 24, 2023

# Your August bill is \$197.20

Due Sep 16

Questions about your bill?

[verizon.com/support](https://verizon.com/support)

800-922-0204

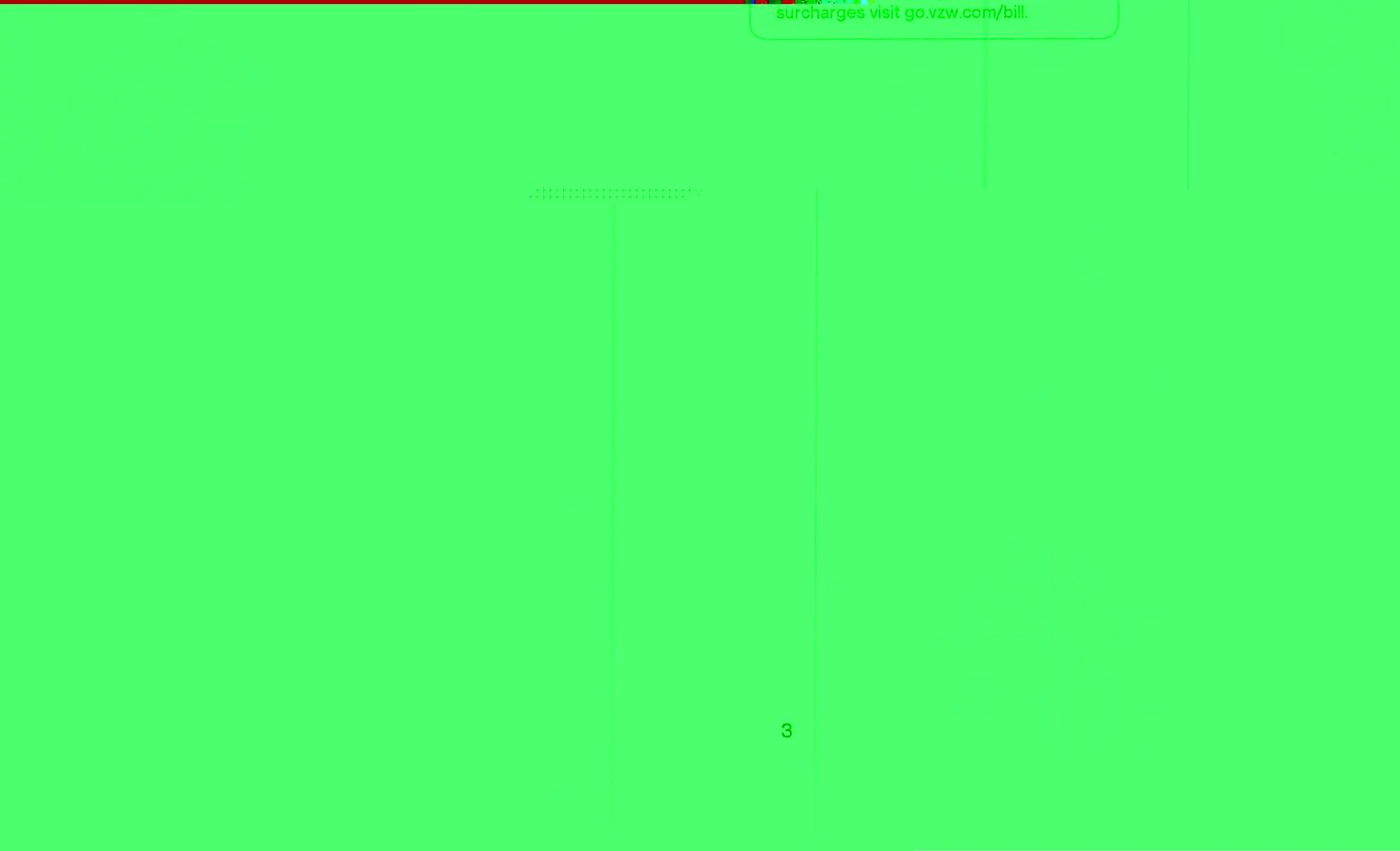
## Since your last bill

 You paid \$197.20.

Business bill only



For taxes, fees and surcharges visit [go.vzw.com/bill](https://go.vzw.com/bill).





**Account:** 425623101-00001  
**Invoice:** 8547578503  
**Billing period:** Jul 25 - Aug 24, 2023

**Charges by line details**

**Account-wide charges & credits** **\$0.00**

**Baraq Stein** **\$103.60**  
 Smartphone  
 202-297-5057

**Plan** **\$70.00**  
 5G Do More **\$80.00**  
 Aug 25 - Sep 24  
 Auto Pay and paper-free billing discount **-\$10.00**  
 Aug 25 - Sep 24

**Devices** **\$10.00**  
 IPHONE 14 PLUS 128 MIDNIGHT **\$24.99**  
 Payment 4 of 36 (\$799.68 remaining)  
 Agreement 1609082793  
 Device Promotional Credit **-\$14.99**  
 Credit

**Plan**  
 Plans are billed a month in advance.  
 Includes the \$10/month discount on your 5G DO MORE plan for being enrolled in Auto Pay and paper-free billing.

**Services & Perks**  
 Taxes for Services & Perks purchases and "Purchases from other vendors" are billed in "Taxes and gov fees." For a breakout of tax details visit [go.vzw.com/mybill](http://go.vzw.com/mybill).

**\$17.00**

\$17.00

**\$6.16**

\$0.87

\$0.09

\$3.30

\$1.14

\$0.76

**\$0.44**

\$0.44

**\$93.60**

**Services & perks**

Verizon Mobile Protect  
 Aug 25 - Sep 24

**Surcharges**

Fed Universal Service Charge  
 Regulatory Charge  
 Admin & Telco Recovery Charge  
 DC Gross Receipt Surchg  
 DC 911 Surcharge

**Taxes & gov fees**

DC State Sales Tax

**Baraq Stein**

Smartphone  
 202-875-3955



**Account:** 425623101-00001

**Invoice:** 8547578503

**Billing period:** Jul 25 - Aug 24, 2023

**Charges by line details (continued)**

|   |                |
|---|----------------|
| <b>Plan</b>   | <b>\$70.00</b> |
| 5G Do More<br>Aug 25 - Sep 24                               | \$80.00        |
| Auto Pay and paper-free billing discount<br>Aug 25 - Sep 24 | -\$10.00       |

|   |                |
|---|----------------|
| <b>Services &amp; perks</b>               | <b>\$17.00</b> |
| Verizon Mobile Protect<br>Aug 25 - Sep 24 | \$17.00        |

|                               |               |
|-------------------------------|---------------|
| <b>Surcharges</b>             | <b>\$6.16</b> |
| Fed Universal Service Charge  | \$0.87        |
| Regulatory Charge             | \$0.09        |
| Admin & Telco Recovery Charge | \$3.30        |
| DC Gross Receipt Surchg       | \$1.14        |
| DC 911 Surcharge              | \$0.76        |

|                             |               |
|-----------------------------|---------------|
| <b>Taxes &amp; gov fees</b> | <b>\$0.44</b> |
| DC State Sales Tax          | \$0.44        |

**Plan**

Plans are billed a month in advance.  
Includes the \$10/month discount on your 5G DO MORE plan for being enrolled in Auto Pay and paper-free billing.

**Services & Perks**

Taxes for Services & Perks purchases and "Purchases from other vendors" are billed in "Taxes and gov fees." For a breakout of tax details visit [go.vzw.com/mybill](http://go.vzw.com/mybill).



Account: 425623101-00001

Invoice: 8547578503

Billing period: Jul 25 - Aug 24, 2023

## Talk activity

**Baraq Stein**  
**202-297-5057**  
**iPhone 14 Plus**

| Date   | Time     | Number       | Origination    | Destination    | Min. | Airtime Charges | LD/Other Charges | Total |
|--------|----------|--------------|----------------|----------------|------|-----------------|------------------|-------|
| Jul 25 | 2:17 PM  | 202-685-9918 | Washington, DC | Washington, DC | 1    | --              | --               | --    |
| Jul 25 | 2:53 PM  | 202-685-9994 | Washington, DC | Washington, DC | 1    | --              | --               | --    |
| Jul 25 | 3:06 PM  | 202-875-3955 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 25 | 3:07 PM  | 202-875-3955 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 25 | 6:37 PM  | 202-875-3955 | Washington, DC | Wshngtnzn1, DC | 1    | --              | --               | --    |
| Jul 25 | 6:43 PM  | 202-875-3955 | Washington, DC | Wshngtnzn1, DC | 1    | --              | --               | --    |
| Jul 25 | 6:44 PM  | 202-875-3955 | Washington, DC | Wshngtnzn1, DC | 1    | --              | --               | --    |
| Jul 26 | 3:04 PM  | 202-302-5521 | Washington, DC | Incoming, CL   | 3    | --              | --               | --    |
| Jul 28 | 8:42 AM  | 202-875-3955 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 28 | 8:51 AM  | 202-875-3955 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 28 | 9:05 AM  | 202-685-9802 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 28 | 9:52 AM  | 202-875-3955 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 28 | 10:26 AM | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 28 | 12:26 PM | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 28 | 1:47 PM  | 202-546-8907 | Washington, DC | Washington, DC | 1    | --              | --               | --    |
| Jul 28 | 2:00 PM  | 202-546-8907 | Washington, DC | Washington, DC | 1    | --              | --               | --    |
| Jul 28 | 2:25 PM  | 202-546-8907 | Washington, DC | Washington, DC | 1    | --              | --               | --    |
| Jul 28 | 2:38 PM  | 202-546-8907 | Washington, DC | Washington, DC | 1    | --              | --               | --    |
| Jul 28 | 2:59 PM  | 202-821-7694 | Washington, DC | Incoming, CL   | 48   | --              | --               | --    |
| Jul 28 | 4:04 PM  | 202-685-9802 | Washington, DC | Washington, DC | 1    | --              | --               | --    |
| Jul 28 | 4:37 PM  | 202-302-5521 | Washington, DC | Incoming, CL   | 21   | --              | --               | --    |
| Jul 28 | 8:12 PM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 28 | 8:14 PM  | 415-969-5826 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 28 | 9:58 PM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 28 | 11:07 PM | 202-875-3955 | Washington, DC | Wshngtnzn1, DC | 10   | --              | --               | --    |
| Jul 28 | 11:17 PM | 202-875-3955 | Washington, DC | Wshngtnzn1, DC | 5    | --              | --               | --    |
| Jul 29 | 11:30 PM | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 29 | 11:31 PM | 202-301-8961 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 29 | 11:33 PM | 571-495-8010 | Washington, DC | Incoming, CL   | 2    | --              | --               | --    |
| Jul 30 | 1:56 PM  | 202-875-3955 | Washington, DC | Wshngtnzn1, DC | 1    | --              | --               | --    |
| Jul 30 | 3:48 PM  | 202-667-5937 | Washington, DC | Washington, DC | 2    | --              | --               | --    |
| Jul 31 | 8:54 AM  | 202-265-0272 | Washington, DC | Washington, DC | 3    | --              | --               | --    |
| Jul 31 | 3:19 PM  | 202-875-3955 | Washington, DC | Wshngtnzn1, DC | 1    | --              | --               | --    |
| Jul 31 | 3:24 PM  | 202-875-3955 | Washington, DC | Wshngtnzn1, DC | 1    | --              | --               | --    |
| Jul 31 | 3:33 PM  | 202-875-3955 | Washington, DC | Wshngtnzn1, DC | 1    | --              | --               | --    |
| Aug 2  | 12:28 PM | 202-667-5937 | Washington, DC | Washington, DC | 2    | --              | --               | --    |
| Aug 2  | 1:14 PM  | 202-875-3955 | Washington, DC | Wshngtnzn1, DC | 1    | --              | --               | --    |
| Aug 2  | 1:44 PM  | 334-209-4999 | Washington, DC | Auburn, AL     | 12   | --              | --               | --    |
| Aug 2  | 3:24 PM  | 202-265-0272 | Washington, DC | Washington, DC | 4    | --              | --               | --    |
| Aug 2  | 3:35 PM  | 240-505-0997 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 2  | 3:41 PM  | 240-505-0997 | Washington, DC | Incoming, CL   | 10   | --              | --               | --    |
| Aug 3  | 10:35 AM | 202-265-0272 | Washington, DC | Washington, DC | 1    | --              | --               | --    |
| Aug 3  | 2:03 PM  | 334-209-4999 | Washington, DC | Auburn, AL     | 1    | --              | --               | --    |
| Aug 3  | 4:12 PM  | 202-265-0272 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 4  | 8:00 AM  | 202-280-9910 | Washington, DC | Wshngtnzn1, DC | 2    | --              | --               | --    |
| Aug 4  | 10:06 AM | 240-505-0997 | Washington, DC | Wshngtnzn3, MD | 1    | --              | --               | --    |
| Aug 4  | 3:17 PM  | 202-667-7888 | Washington, DC | Washington, DC | 1    | --              | --               | --    |
| Aug 4  | 4:09 PM  | 202-547-8405 | Washington, DC | Washington, DC | 2    | --              | --               | --    |



Account: 425623101-00001

Invoice: 8547578503

Billing period: Jul 25 - Aug 24, 2023

## Talk activity (cont.)

**Baraq Stein**  
**202-297-5057**  
**iPhone 14 Plus**

| Date   | Time     | Number       | Origination    | Destination    | Min. | Airtime Charges | LD/Other Charges | Total |
|--------|----------|--------------|----------------|----------------|------|-----------------|------------------|-------|
| Aug 4  | 10:11 PM | 240-346-5904 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 4  | 10:14 PM | 202-875-3955 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 4  | 10:14 PM | 240-346-5904 | Washington, DC | Incoming, CL   | 3    | --              | --               | --    |
| Aug 5  | 8:08 AM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 5  | 10:24 AM | 630-338-7833 | Washington, DC | Incoming, CL   | 2    | --              | --               | --    |
| Aug 5  | 10:30 AM | 630-338-7833 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 5  | 10:39 AM | 609-678-6605 | Washington, DC | Medford, NJ    | 1    | --              | --               | --    |
| Aug 5  | 10:49 AM | 917-767-8987 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 7  | 2:36 PM  | 866-609-8026 | Washington, DC | Incoming, CL   | 3    | --              | --               | --    |
| Aug 7  | 2:51 PM  | 866-609-8026 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 7  | 3:56 PM  | 732-233-6731 | Washington, DC | Longbranch, NJ | 11   | --              | --               | --    |
| Aug 7  | 5:55 PM  | 202-875-3955 | Washington, DC | Wshngtnzn1, DC | 1    | --              | --               | --    |
| Aug 7  | 6:50 PM  | 202-340-9006 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 8  | 10:50 AM | 202-391-3798 | Washington, DC | Incoming, CL   | 2    | --              | --               | --    |
| Aug 8  | 2:39 PM  | 703-601-6827 | Washington, DC | Alexandria, VA | 2    | --              | --               | --    |
| Aug 8  | 3:46 PM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 9  | 10:18 AM | 571-495-8010 | Washington, DC | Incoming, CL   | 2    | --              | --               | --    |
| Aug 9  | 2:06 PM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 10 | 8:33 AM  | 202-391-3798 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 10 | 8:37 AM  | 202-875-3955 | Washington, DC | Wshngtnzn1, DC | 1    | --              | --               | --    |
| Aug 10 | 8:38 AM  | 202-875-3955 | Washington, DC | Wshngtnzn1, DC | 1    | --              | --               | --    |
| Aug 10 | 8:49 AM  | 202-391-3798 | Washington, DC | VM Deposit, CL | 1    | --              | --               | --    |
| Aug 10 | 8:52 AM  | 202-391-3798 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 10 | 9:33 AM  | 202-391-3798 | Washington, DC | Washington, DC | 3    | --              | --               | --    |
| Aug 10 | 11:53 AM | 503-917-9171 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 10 | 3:39 PM  | 202-821-7694 | Washington, DC | Incoming, CL   | 2    | --              | --               | --    |
| Aug 11 | 9:58 AM  | 202-391-3798 | Washington, DC | Washington, DC | 1    | --              | --               | --    |
| Aug 11 | 9:59 AM  | 202-875-3955 | Washington, DC | Wshngtnzn1, DC | 1    | --              | --               | --    |
| Aug 11 | 10:15 AM | 202-483-2511 | Washington, DC | Incoming, CL   | 2    | --              | --               | --    |
| Aug 11 | 4:12 PM  | 202-596-1110 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 11 | 4:14 PM  | 407-451-1395 | Washington, DC | Incoming, CL   | 9    | --              | --               | --    |
| Aug 11 | 4:58 PM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 12 | 9:57 AM  | 202-875-3955 | Arlington, VA  | Wshngtnzn1, DC | 1    | --              | --               | --    |
| Aug 13 | 11:21 AM | 202-875-3955 | Washington, DC | Wshngtnzn1, DC | 1    | --              | --               | --    |
| Aug 13 | 11:34 AM | 706-662-9012 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 13 | 11:46 AM | 706-662-9012 | Washington, DC | Columbus, GA   | 2    | --              | --               | --    |
| Aug 13 | 11:51 AM | 301-800-1710 | Washington, DC | Incoming, CL   | 3    | --              | --               | --    |
| Aug 13 | 4:03 PM  | 202-875-3955 | Washington, DC | Wshngtnzn1, DC | 1    | --              | --               | --    |
| Aug 14 | 11:58 AM | 202-875-3955 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 14 | 2:44 PM  | 202-875-3955 | Washington, DC | Wshngtnzn1, DC | 2    | --              | --               | --    |
| Aug 14 | 2:59 PM  | 202-875-3955 | Washington, DC | Wshngtnzn1, DC | 1    | --              | --               | --    |
| Aug 15 | 8:05 AM  | 703-447-3332 | Washington, DC | Incoming, CL   | 22   | --              | --               | --    |
| Aug 15 | 11:24 AM | 202-332-6400 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 15 | 11:31 AM | 202-821-7694 | Washington, DC | Incoming, CL   | 3    | --              | --               | --    |
| Aug 15 | 1:02 PM  | 202-821-7694 | Washington, DC | Washington, DC | 5    | --              | --               | --    |



**Account:** 425623101-00001  
**Invoice:** 8547578503  
**Billing period:** Jul 25 - Aug 24, 2023

**Talk activity (cont.)**

**Baraq Stein**  
**202-297-5057**  
**iPhone 14 Plus**

| Date   | Time     | Number       | Origination    | Destination    | Min. | Airtime Charges | LD/Other Charges | Total |
|--------|----------|--------------|----------------|----------------|------|-----------------|------------------|-------|
| Aug 15 | 11:20 PM | 415-969-5826 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 15 | 11:20 PM | 571-495-8010 | Washington, DC | Incoming, CL   | 2    | --              | --               | --    |
| Aug 15 | 11:20 PM | 202-301-8957 | Washington, DC | Incoming, CL   | 2    | --              | --               | --    |
| Aug 15 | 11:22 PM | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 16 | 9:20 AM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 16 | 11:54 AM | 202-636-4213 | Washington, DC | Washington, DC | 1    | --              | --               | --    |
| Aug 16 | 12:11 PM | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 16 | 1:02 PM  | 202-288-1996 | Washington, DC | Incoming, CL   | 2    | --              | --               | --    |
| Aug 16 | 1:07 PM  | 202-288-1996 | Washington, DC | Washington, DC | 17   | --              | --               | --    |
| Aug 16 | 2:12 PM  | 202-745-8000 | Washington, DC | Incoming, CL   | 2    | --              | --               | --    |
| Aug 16 | 2:22 PM  | 202-745-8000 | Washington, DC | Incoming, CL   | 3    | --              | --               | --    |
| Aug 17 | 11:35 AM | 202-745-8000 | Washington, DC | Incoming, CL   | 2    | --              | --               | --    |
| Aug 17 | 12:55 PM | 334-209-4999 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 17 | 7:04 PM  | 334-209-4999 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 18 | 10:10 AM | 202-745-8000 | Washington, DC | Incoming, CL   | 28   | --              | --               | --    |
| Aug 18 | 11:12 AM | 202-745-8000 | Washington, DC | Incoming, CL   | 2    | --              | --               | --    |
| Aug 18 | 4:11 PM  | 202-297-6366 | Washington, DC | Incoming, CL   | 2    | --              | --               | --    |
| Aug 18 | 4:39 PM  | 202-297-6366 | Washington, DC | Washington, DC | 30   | --              | --               | --    |
| Aug 18 | 7:35 PM  | 580-230-9645 | Washington, DC | Durant, OK     | 7    | --              | --               | --    |
| Aug 18 | 10:57 PM | 334-209-4999 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 20 | 9:31 AM  | 202-875-3955 | Washington, DC | Wshngtnzn1, DC | 1    | --              | --               | --    |
| Aug 20 | 9:31 AM  | 202-875-3955 | Washington, DC | Wshngtnzn1, DC | 1    | --              | --               | --    |
| Aug 21 | 9:50 AM  | 202-945-9506 | Washington, DC | Wshngtnzn1, DC | 21   | --              | --               | --    |
| Aug 21 | 11:17 AM | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 21 | 6:08 PM  | 202-340-9006 | Washington, DC | Incoming, CL   | 2    | --              | --               | --    |
| Aug 21 | 7:21 PM  | 202-340-9006 | Washington, DC | Incoming, CL   | 3    | --              | --               | --    |
| Aug 22 | 11:10 AM | 202-685-9820 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 22 | 7:52 PM  | 334-209-4999 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 23 | 7:07 PM  | 334-209-4999 | Washington, DC | Auburn, AL     | 1    | --              | --               | --    |
| Aug 23 | 7:08 PM  | 334-209-4999 | Washington, DC | Incoming, CL   | 41   | --              | --               | --    |

**Talk activity**

**Baraq Stein**  
**202-875-3955**  
**iPhone XR**

| Date   | Time    | Number       | Origination    | Destination    | Min. | Airtime Charges | LD/Other Charges | Total |
|--------|---------|--------------|----------------|----------------|------|-----------------|------------------|-------|
| Jul 25 | 3:06 PM | 202-297-5057 | Washington, DC | Washington, DC | 1    | --              | --               | --    |
| Jul 25 | 3:07 PM | 202-297-5057 | Washington, DC | Washington, DC | 1    | --              | --               | --    |
| Jul 25 | 5:12 PM | 866-306-7076 | Washington, DC | Incoming, CL   | 17   | --              | --               | --    |
| Jul 25 | 5:36 PM | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 25 | 5:45 PM | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 25 | 6:33 PM | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |



Account: 425623101-00001

Invoice: 8547578503

Billing period: Jul 25 - Aug 24, 2023

**Talk activity (cont.)**

**Baraq Stein**  
**202-875-3955**  
**iPhone XR**

| Date   | Time     | Number       | Origination    | Destination    | Min. | Airtime Charges | LD/Other Charges | Total |
|--------|----------|--------------|----------------|----------------|------|-----------------|------------------|-------|
| Jul 25 | 6:37 PM  | 202-297-5057 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 25 | 6:43 PM  | 202-297-5057 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 25 | 6:44 PM  | 202-297-5057 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 26 | 6:49 PM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 26 | 7:06 PM  | 202-879-4604 | Washington, DC | Washington, DC | 2    | --              | --               | --    |
| Jul 27 | 12:13 PM | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 27 | 5:03 PM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 28 | 8:42 AM  | 202-297-5057 | Washington, DC | Washington, DC | 1    | --              | --               | --    |
| Jul 28 | 8:51 AM  | 202-297-5057 | Washington, DC | Washington, DC | 1    | --              | --               | --    |
| Jul 28 | 9:52 AM  | 202-297-5057 | Washington, DC | Washington, DC | 1    | --              | --               | --    |
| Jul 28 | 11:07 PM | 202-297-5057 | Washington, DC | Incoming, CL   | 10   | --              | --               | --    |
| Jul 28 | 11:17 PM | 202-297-5057 | Washington, DC | Incoming, CL   | 5    | --              | --               | --    |
| Jul 28 | 11:35 PM | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 29 | 9:28 AM  | 202-798-8388 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 29 | 9:30 AM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 29 | 9:34 AM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 29 | 12:00 PM | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 29 | 7:45 PM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 30 | 2:17 PM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 30 | 7:35 PM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 31 | 3:19 PM  | 202-297-5057 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 31 | 3:24 PM  | 202-297-5057 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 31 | 3:33 PM  | 202-297-5057 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Jul 31 | 3:46 PM  | 202-803-2915 | Washington, DC | Wshngtnzn1, DC | 1    | --              | --               | --    |
| Jul 31 | 4:02 PM  | 703-528-8726 | Washington, DC | Arlington, VA  | 1    | --              | --               | --    |
| Aug 1  | 12:46 PM | 920-629-1496 | Washington, DC | Manitowoc, WI  | 4    | --              | --               | --    |
| Aug 1  | 12:52 PM | 920-629-1496 | Washington, DC | Manitowoc, WI  | 4    | --              | --               | --    |
| Aug 1  | 12:56 PM | 920-629-1496 | Washington, DC | Manitowoc, WI  | 3    | --              | --               | --    |
| Aug 1  | 1:41 PM  | 202-543-0800 | Washington, DC | Washington, DC | 3    | --              | --               | --    |
| Aug 1  | 7:27 PM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 2  | 1:14 PM  | 202-297-5057 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 2  | 7:40 PM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 3  | 2:12 PM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 4  | 12:18 PM | 920-629-1496 | Washington, DC | Incoming, CL   | 3    | --              | --               | --    |
| Aug 4  | 1:24 PM  | 920-629-1496 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 4  | 5:32 PM  | 920-629-1496 | WIFI CL        | Manitowoc, WI  | 2    | --              | --               | --    |
| Aug 4  | 5:58 PM  | 920-629-1496 | Washington, DC | Manitowoc, WI  | 1    | --              | --               | --    |
| Aug 4  | 5:58 PM  | 920-629-1496 | Washington, DC | Manitowoc, WI  | 1    | --              | --               | --    |
| Aug 4  | 6:37 PM  | 571-357-6701 | Washington, DC | Wsngtnzn08, VA | 1    | --              | --               | --    |
| Aug 4  | 6:38 PM  | 571-357-6701 | Washington, DC | Wsngtnzn08, VA | 1    | --              | --               | --    |
| Aug 4  | 6:42 PM  | 888-202-1024 | Washington, DC | Toll-Free, CL  | 1    | --              | --               | --    |
| Aug 4  | 6:50 PM  | 800-435-9792 | Washington, DC | Toll-Free, CL  | 9    | --              | --               | --    |
| Aug 4  | 10:14 PM | 202-297-5057 | Washington, DC | Washington, DC | 1    | --              | --               | --    |
| Aug 5  | 9:36 AM  | 920-629-1496 | Washington, DC | Manitowoc, WI  | 1    | --              | --               | --    |
| Aug 5  | 3:05 PM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |



Account: 425623101-00001

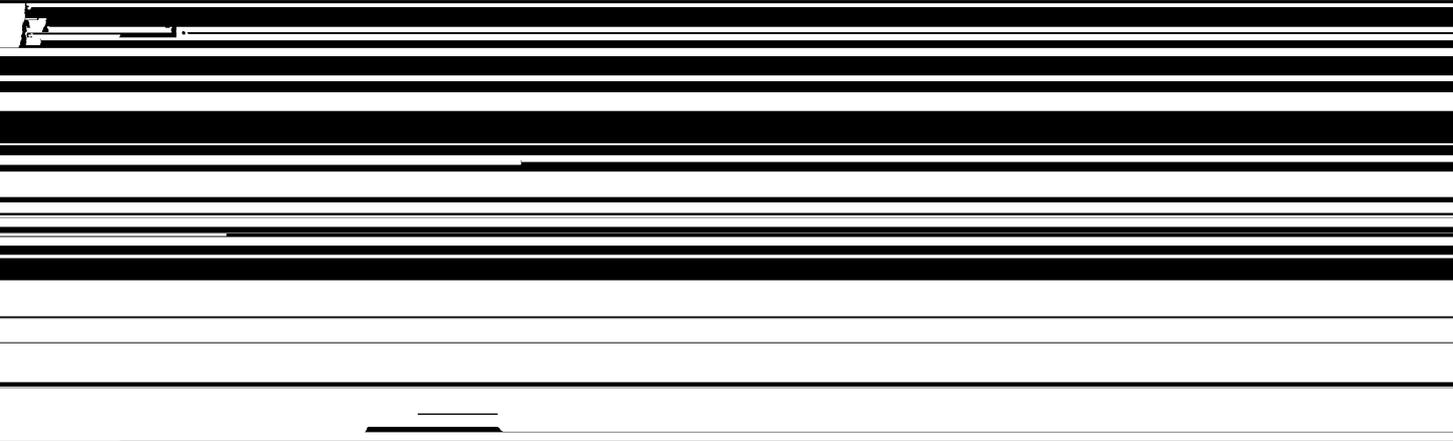
Invoice: 8547578503

Billing period: Jul 25 - Aug 24, 2023

**Talk activity (cont.)**

**Baraq Stein**  
**202-875-3955**  
**iPhone XR**

| Date   | Time     | Number       | Origination    | Destination    | Min. | Airtime Charges | LD/Other Charges | Total |
|--------|----------|--------------|----------------|----------------|------|-----------------|------------------|-------|
| Aug 5  | 7:06 PM  | 920-629-1496 | Washington, DC | Manitowoc, WI  | 1    | --              | --               | --    |
| Aug 5  | 7:07 PM  | 920-629-1496 | Washington, DC | Incoming, CL   | 2    | --              | --               | --    |
| Aug 5  | 9:25 PM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 6  | 6:53 PM  | 888-766-2484 | WiFi CL        | Toll-Free, CL  | 1    | --              | --               | --    |
| Aug 6  | 7:24 PM  | 423-467-6460 | Washington, DC | Incoming, CL   | 2    | --              | --               | --    |
| Aug 6  | 7:43 PM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 7  | 10:59 AM | 920-629-1496 | Washington, DC | Manitowoc, WI  | 1    | --              | --               | --    |
| Aug 7  | 11:00 AM | 920-629-1496 | Washington, DC | Manitowoc, WI  | 2    | --              | --               | --    |
| Aug 8  | 10:13 AM | 920-629-1496 | Washington, DC | Manitowoc, WI  | 1    | --              | --               | --    |
| Aug 8  | 10:35 AM | 920-629-1496 | Washington, DC | Manitowoc, WI  | 1    | --              | --               | --    |
| Aug 8  | 11:20 AM | 920-629-1496 | Washington, DC | Manitowoc, WI  | 1    | --              | --               | --    |
| Aug 8  | 12:30 PM | 920-629-1496 | Washington, DC | Manitowoc, WI  | 1    | --              | --               | --    |
| Aug 8  | 12:32 PM | 920-629-1496 | Washington, DC | Manitowoc, WI  | 2    | --              | --               | --    |
| Aug 8  | 5:42 PM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 8  | 6:02 PM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 8  | 6:53 PM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 9  | 7:03 PM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 10 | 8:38 AM  | 202-297-5057 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 11 | 9:26 AM  | 202-519-2620 | WiFi CL        | Wshngtnzn1, DC | 3    | --              | --               | --    |
| Aug 11 | 9:59 AM  | 202-297-5057 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 11 | 1:03 PM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 12 | 5:03 PM  | 920-323-6375 | Washington, DC | Manitowoc, WI  | 1    | --              | --               | --    |
| Aug 12 | 5:11 PM  | 920-323-6375 | Washington, DC | Incoming, CL   | 4    | --              | --               | --    |
| Aug 12 | 6:19 PM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 13 | 11:21 AM | 202-297-5057 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 13 | 4:03 PM  | 202-297-5057 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 14 | 11:58 AM | 202-297-5057 | WiFi CL        | Washington, DC | 1    | --              | --               | --    |
| Aug 14 | 2:44 PM  | 202-297-5057 | Washington, DC | Incoming, CL   | 2    | --              | --               | --    |
| Aug 14 | 2:59 PM  | 202-297-5057 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |
| Aug 14 | 7:20 PM  | 920-629-1419 | Washington, DC | Incoming, CL   | 34   | --              | --               | --    |
| Aug 14 | 9:31 PM  | 571-495-8010 | Washington, DC | Incoming, CL   | 1    | --              | --               | --    |



|        |         |              |                |              |   |    |    |    |
|--------|---------|--------------|----------------|--------------|---|----|----|----|
| Aug 15 | 5:55 PM | 571-495-8010 | Washington, DC | Incoming, CL | 1 | -- | -- | -- |
| Aug 15 | 6:24 PM | 571-495-8010 | Washington, DC | Incoming, CL | 1 | -- | -- | -- |
| Aug 16 | 2:20 PM | 202-250-8876 | Washington, DC | Incoming, CL | 2 | -- | -- | -- |
| Aug 17 | 4:51 PM | 571-495-8010 | Washington, DC | Incoming, CL | 1 | -- | -- | -- |
| Aug 17 | 6:51 PM | 571-495-8010 | Washington, DC | Incoming, CL | 1 | -- | -- | -- |



Account: 425623101-00001

Invoice: 8547578503

Billing period: Jul 25 - Aug 24, 2023

### Additional information

#### Customer Protection Network Information

##### (CPNI)

CPNI is information made available to us solely by virtue of our relationship with you that relates to the type, quantity, destination, technical configuration, location, and amount of use of the telecommunications and interconnected VoIP services you purchase from us, as well as related billing information. The protection of your information is important to us, and you have a right, and we have a duty, under federal law, to protect the confidentiality of your CPNI.

We may use and share your CPNI among our affiliates and agents to offer you services that are different from the services you currently purchase from us. Verizon offers a full range of services, such as television, telematics, high-speed Internet, video, and local and long distance services. Visit [Verizon.com](http://Verizon.com) for more information on our services and companies.

If you don't want your CPNI used for the marketing purposes described above, please notify us by phone any time at 800.333.9956 or online at [vzw.com/myprivacy](http://vzw.com/myprivacy).

Unless you notify us in one of these ways, we may use your CPNI as described above beginning 30 days after the first time we notify you of this CPNI policy. Your choice will remain valid until you notify us that you wish to change your selection. Your decision about use of your CPNI will not affect the provision of any services you currently have with us.

Note: This CPNI notice does not apply to residents of the state of Arizona.

##### Explanation of Surcharges

Verizon wireless surcharges include (i) a Regulatory Charge (which helps defray various government charges we pay including government number administration and license fees); (ii) a Federal Universal Service Charge (and, if applicable, a State Universal Service Charge) to recover charges imposed on us by the government to support universal service; and (iii) an Administrative and Telco Recovery Charge, which helps defray and recover certain direct and indirect costs we or our agents incur, including:

- (a) costs of complying with regulatory and industry obligations and programs, such as E911, wireless local number portability and wireless tower mandate costs;
- (b) property taxes; and
- (c) costs associated with our network, including facilities (e.g. leases), operations, maintenance and protection, and costs paid to other companies for network services.

**Please note that these are Verizon wireless charges, not taxes or government imposed fees. These charges, and what's included, are subject to change from time to time.**

##### Returned Payments

If you pay your wireless bill by check and your check is returned by your bank for insufficient funds, Verizon Wireless may resubmit your check to your bank for payment from your checking account.

#### Service Plan Features & Services

If your service plan has optional features or services that are included as part of your monthly subscription, electing to activate these subscriptions may affect your surcharges, taxes and governmental fees, even though your plan monthly service price does not change. Examples of these features are Apple Music or the Disney bundle.

##### Taxes and Other Governmental Charges

We are required by law to collect these charges, which are based on your service address. You can update your service address on [go.vzw.com/changeaddress](http://go.vzw.com/changeaddress).

##### More On Wireless Taxes And Surcharges

Your total charges for this month's bill cycle are \$197.20.

This includes charges for one or more bundled Verizon service plans that include voice, messaging, data, or other services for which you pay a monthly plan charge.

This bill cycle, your fixed monthly plan charges were \$140.00 (before applying any discounts or credits, and excluding other charges such as overage, late payment, taxes, Verizon surcharges, and equipment).

To accurately bill taxes and Verizon surcharges, we regularly look at past network usage by you and other customers with similar plans to allocate this fixed monthly plan charge among the services included in the bundle.

In this bill cycle, we have allocated this amount as follows: \$7.40 for voice, \$2.08 for messaging, \$118.54 for data, and \$11.98 for other services.

For more information, please go to [vzw.com/taxesandsurcharges](http://vzw.com/taxesandsurcharges).

##### Bankruptcy Information

If you are or were in bankruptcy, this bill may include amounts for pre-bankruptcy charges. You should not pay pre-bankruptcy amounts; they are for your information only. In the event Verizon receives notice of a bankruptcy filing, pre-bankruptcy charges will be adjusted in future invoices. Mail bankruptcy-related correspondence to 500 Technology Drive, Suite 550, Weldon Spring, MO 63304.

##### Regulatory Charge Increase

"Effective September 1, 2023, the monthly Verizon Wireless Regulatory Charge for voice-capable devices will increase from \$0.09 to \$0.16 per line. The charge for data-only devices remains at \$0.02 per line. Please note that this is a Verizon Wireless charge, not a tax. This charge, and what's included, are subject to change from time to time. For further information regarding this charge, review the "Explanation of Surcharges" section of this bill."



**Account:** 425623101-00001

**Invoice:** 8547578503

**Billing period:** Jul 25 - Aug 24, 2023

## **Additional information continued**

### **Affordable Connectivity Program (ACP)**

As a Verizon customer, we'd like to provide you with some information on the federal Affordable Connectivity Program (ACP).

#### **What is the ACP?**

The ACP was created by Congress and implemented by the Federal Communications Commission (FCC) to help eligible households receive a subsidy of up to \$30 a month, or up to \$75 a month on Tribal Lands, towards internet service.

#### **Who is eligible to participate in the ACP?**

You may be qualified for the program if:

You, your child or dependent participate in certain government assistance programs, such as

SNAP, Medicaid, WIC, or other programs.

You're a member of select Tribal Assistance programs.

You, your child or dependent already receive a Lifeline benefit.

You received a Federal Pell Grant in the current award year.

You're eligible based on your household income.

#### **How do I enroll in the ACP?**

Step 1: Apply to qualify at [ACPBenefit.org](http://ACPBenefit.org).

Step 2: After your service has been activated, complete enrollment at <http://verizon.com/acpconsent> to have the subsidy applied to your bill.

Thanks for choosing Verizon.

**Note:** ACP is non-transferrable and limited to one monthly internet discount. ACP is a federal government benefit program operated by the Federal Communications Commission and, if it ends, or when a household is no longer eligible, customers will be subject to the provider's regular rates, terms, and conditions

# **Exhibit 3**

**Fw: Online Applications Quick Start Guide for Cardholders\_DoD.pdf**

Strickland, Lejuan Terrell MAJ USARMY NG DCARNG (USA) <lejuan.t.strickland.mil@army.mil>

Fri 8/11/2023 8:03 PM

To: Nick Harrison <nick@harrison-stein.com>

Cc: Koroma, Mariatu R 1SG USARMY NG DCARNG (USA) <mariatu.r.koroma.mil@army.mil>; Washington, Terrence O SFC USARMY NG DCARNG (USA) <terrence.o.washington.mil@army.mil>

 1 attachments (2 MB)

Online Applications Quick Start Guide for Cardholders\_DoD.pdf;

1LT Harrison,

Lets connect tomorrow. please see the instructions from SFC Washington attached.

Very Respectfully,

MAJ Strickland

---

**From:** Terrance Washington <strength86@live.com>

**Sent:** Friday, August 11, 2023 5:58 PM

**To:** Strickland, Lejuan Terrell MAJ USARMY NG DCARNG (USA) <lejuan.t.strickland.mil@army.mil>

**Subject:** [Non-DoD Source] Fwd: Online Applications Quick Start Guide for Cardholders\_DoD.pdf

CHANGE:

APPROVER 1 is Terrence.o.washington.mil@army.mil

Supervisor is

Terrence.o.washington.mil@army.mil

# **Exhibit 4**

**Re: Online Applications Quick Start Guide for Cardholders\_DoD.pdf**

Nick Harrison

Sat 8/12/2023 5:15 PM

To: Strickland, Lejuan Terrell MAJ USARMY NG DCARNG (USA) <lejuan.t.strickland.mil@army.mil>

Cc: Koroma, Mariatu R 1SG USARMY NG DCARNG (USA) <mariatu.r.koroma.mil@army.mil>; Washington, Terrence O SFC USARMY NG DCARNG (USA) <terrence.o.washington.mil@army.mil>

Did you still want to chat sometime today? And, is anything in the works for an imminent departure? Or, is there any update that I should send to the DCC instructors?

Very Respectfully,

1LT Harrison

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---

**From:** Strickland, Lejuan Terrell MAJ USARMY NG DCARNG (USA) <lejuan.t.strickland.mil@army.mil>

**Sent:** Friday, August 11, 2023 8:02:48 PM

**To:** Nick Harrison <nick@harrison-stein.com>

**Cc:** Koroma, Mariatu R 1SG USARMY NG DCARNG (USA) <mariatu.r.koroma.mil@army.mil>; Washington, Terrence O SFC USARMY NG DCARNG (USA) <terrence.o.washington.mil@army.mil>

**Subject:** Fw: Online Applications Quick Start Guide for Cardholders\_DoD.pdf

1LT Harrison,

Lets connect tomorrow. please see the instructions from SFC Washington attached.

Very Respectfully,

MAJ Strickland

---

**From:** Terrance Washington <strength86@live.com>

**Sent:** Friday, August 11, 2023 5:58 PM

**To:** Strickland, Lejuan Terrell MAJ USARMY NG DCARNG (USA) <lejuan.t.strickland.mil@army.mil>

**Subject:** [Non-DoD Source] Fwd: Online Applications Quick Start Guide for Cardholders\_DoD.pdf

CHANGE:

APPROVER 1 is Terrence.o.washington.mil@army.mil

Supervisor is

Terrence.o.washington.mil@army.mil

# **Exhibit 5**

**Re: Urgent Assistance Needed for Upcoming Reporting on Sunday**

GRANDPIERRE, PAUL LTC USARMY NG DCARNG (USA) <paul.grandpierre.mil@army.mil>

Fri 8/11/2023 4:54 PM

To: Nick Harrison <nick@harrison-stein.com>; Berlin, Adam J COL USARMY NG DCARNG (USA) <adam.j.berlin.mil@army.mil>; Currier, Benjamin P LTC USARMY NG NG GC (USA) <benjamin.p.currier.mil@army.mil>

1LT Harrison,

My understanding is that JFHQ is diligently working through the issues you referenced with 1SG Thompson. Please reach out to MAJ Strickland directly if you require further assistance.

Very respectfully,

PAUL GRANDPIERRE  
Lieutenant Colonel, Deputy Staff Judge Advocate  
Joint Force Headquarters  
Office of the Staff Judge Advocate  
District of Columbia National Guard  
Phone: 202-306-5678  
[paul.grandpierre.mil@army.mil](mailto:paul.grandpierre.mil@army.mil)

Advocate

Classified by: DCNG-OSJA  
Categories: AWP  
Dissemination Control: FED  
Paul Grandpierre, Lieutenant Colonel, LTC, JA, 202-306-5678

CUI  
Controlle  
CUI Cate  
Limited D  
POC: Pau

**ATTORNEY WORK PRODUCT:** This electronic transmission may contain attorney work-product or information protected under the attorney-client privilege, both of which are

**ATTORNEY**  
informat

[nick@harrison-stein.com](mailto:nick@harrison-stein.com)

[adam.j.berlin.mil@army.mil](mailto:adam.j.berlin.mil@army.mil)

[benjamin.p.currier.mil@army.mil](mailto:benjamin.p.currier.mil@army.mil)

[paul.grandpierre.mil@army.mil](mailto:paul.grandpierre.mil@army.mil)

Good morning, sir. I don't know if anyone is working this issue. However, if you have any pull with these offices, I need this to happen today. Otherwise, I will miss the scheduled report time for DCC,

Very Respectfully,

1LT Harrison

Get [Outlook for iOS](#)

**From:** Nick Harrison <nick@harrison-stein.com>

**Sent:** Friday, August 11, 2023 9:42 AM

**To:** McCall, Chester II CIV NG DCARNG (USA) <chester.mccall3.civ@army.mil>; Cochran, Latanya SFC USARMY NG DCARNG (USA) <latanya.cochran.mil@army.mil>

**Cc:** Strickland, Lejuan Terrell CPT USARMY NG DCARNG (USA) <lejuan.t.strickland.mil@army.mil>

**Subject:** Re: Urgent Assistance Needed for Upcoming Reporting on Sunday

Did anyone receive this message?

— 1LT Harrison

Get [Outlook for iOS](#)

**From:** Nick Harrison

**Sent:** Friday, August 11, 2023 1:06:30 AM

**To:** McCall, Chester II CIV NG DCARNG (USA) <chester.mccall3.civ@army.mil>; Cochran, Latanya SFC USARMY NG DCARNG (USA) <latanya.cochran.mil@army.mil>

**Cc:** Strickland, Lejuan Terrell CPT USARMY NG DCARNG (USA) <lejuan.t.strickland.mil@army.mil>

**Subject:** Urgent Assistance Needed for Upcoming Reporting on Sunday

Dear Mr. McCall,

message finds you well. I'm reaching out to seek assistance regarding some logistical m encountering as I prepare to report to Fort Benning, GA this Sunday.

transition from the enlisted to the officer side, there were some delays in obtaining my CAC only received this past Tuesday. As a result, there are still several systems and services I've to access:

ail.

c partnership paperwork haven't been updated in iPerms, my partner into DEER. So, I will try to get that sorted out

ckland for assisting with the arrangement of my TA-50

I hope this m challenges I'

Due to the t card, which been unable

- (a) I'm yet to have access to my military e-m
- (b) I've encountered issues logging into DTS
- (c) I currently don't possess a GTC.

Additionally, my divorce decree and domesti which has hindered the process of enrolling during in-processing.

However, I'm immensely grateful to MAJ Str equipment draw scheduled for today.

To ensure a smooth report on Sunday, I'm seeking your assistance to obtain my orders and an airline ticket. Given the time constraints, we might need to consider charging the ticket to a USPFO CBA. My hope is to have this settled by the close of business today.

I truly appreciate your understanding and assistance in these matters, especially given the short timeline. Please let me know how best I can facilitate or aid in this process.

Thank you for your time and continued support.

Very Respectfully,

**NICK HARRISON, JD, MBA, PMP**

Managing Partner (DC Bar #1024439)

Harrison-Stein, PC

601 Pennsylvania Avenue NW

South Building, Suite 900

Washington, DC 20004-3647

Office: (202) 434-8292

Cell: (202) 297-5057

# **Exhibit 6**

## Reporting Delay for DCC Class 003-23 Due to Administrative and Systemic Challenges

Nick Harrison

Sun 8/13/2023 10:07 AM

To:Freeman, Lonnie J CIV USARMY MCOE (USA) <lonnie.j.freeman2.civ@army.mil>

I hope this email finds you well. This is **1LT HARRISON, NICHOLAS A. (443-78-2842)**. I am registered to attend DCC Class 003-23 and was scheduled to report at 1200 today. I am writing to provide an update on several logistical, administrative, and systemic barriers that have prevented my timely arrival.

Currently, I am assigned to the DC National Guard. The reasons for my delay include:

- *DEERS Profile Transition*: I faced challenges transitioning my profile in DEERS from enlisted to officer, only receiving my Common Access Card (CAC) last Tuesday.
- *Defense Travel System (DTS) Access*: I have not been granted access to DTS, hindering my travel preparations.
- *Government Travel Card (GTC) Issue*: I await my GTC, which further complicates my travel.
- *Centrally Billed Account (CBA) Arrangements*: Travel through a CBA has yet to be organized for me.
- *Training Orders*: Despite my scheduled participation, I have not received official training orders.

My unit assures me these issues are being actively addressed, but updates over the weekend have been scarce. I deeply regret any inconvenience this situation may cause.

I remain committed to attending DCC and will make every effort to resolve these barriers promptly. I'll ensure to provide timely updates on any developments.

Thank you for your understanding and patience during this time.

Very Respectfully,

**NICK HARRISON, JD, MBA, PMP**

Managing Partner (DC Bar #1024439)

Harrison-Stein, PC

601 Pennsylvania Avenue NW

South Building, Suite 900

Washington, DC 20004-3647

Office: (202) 434-8292

Cell: (202) 297-5057

---

**From:** Freeman, Lonnie J CIV USARMY MCOE (USA)

**Sent:** Wednesday, August 2, 2023 1:01 PM

**To:** Agnew, W Aaron 1LT USARMY NG VTANG (USA); Ekpo, Caroline M 2LT USARMY (USA); Glaze, Samuel M 1LT USARMY (USA); Nick Harrison; JZHILBERT@GMAIL.COM; KEYVILALEXISKING@GMAIL.COM; Mann, Michael H CPT USARMY (USA); Singh, Darren CPT USARMY CHEMICAL SCHL (USA); Dykstra, Kurt D MAJ USARMY (USA); HAKTANIR.K@GMAIL.COM; Hogan, Thomas M CPT USARMY 353 CA CMD (USA); VANIA.N.SIFFRANT.MIL@MAIL.MIL

**Cc:** Nigh, Bryce K CPT USARMY MCOE (USA); Martinez, Loni Y 1SG USARMY MCOE (USA)

**Subject:** DCC Class 003-23 Welcome Letter/Products and Request for Information

Good afternoon everyone,

I am reaching out to you all because you are on the ATRRS roster for DCC Class 003-23 at Fort Moore, GA reporting at 12 Noon on Sunday, 13 AUG 2023.

If you are on this roster by mistake and WILL NOT be attending this August class, please let me know ASAP. Please DO NOT "Reply All"

If you WILL BE attending DCC Class 003-23, please reply, only to me, with the following information (DO NOT "Reply All!):

Your Rank

Your Name (Last, First, Middle Initial if you have one. Suffix if you have one and use it)

Your DoD ID Number (If you have one already)

Your Date of Birth

Your Component (Active, Guard or Reserve)

Your Branch that you are going into (SC, JA, CY, etc.)

Your Cell Phone Number

Your Military email address (if you have one already. @army.mil)

Also, if you are attending, and have not already received the welcome products, attached are the E co 3-11 DCC Class 003-23 Welcome Letter, DCC SOP and other useful information concerning the course at Fort Moore.

Please carefully review and, if you are not already, familiarize yourself with this information, especially the Welcome Letter.

If you have any further questions concerning your DCC Class 003-23 attendance and/or the course itself, please email CPT Nigh and 1SG Martinez (cc'd).

I wish you safe travels to Fort Moore and look forward to your arrival on Sunday, 13 AUG at 12 NOON.

Mr. Lonnie Freeman  
Battalion Training Technician  
3-11 Infantry, 199th IN BDE  
6510 McVeigh Drive; Bldg 76  
Ft. Moore, GA 31905-4410

# **Exhibit 7**

## Missed Report for DCC and Subsequent Implications

Nick Harrison

Sun 8/13/2023 12:30 PM

To: Strickland, Lejuan Terrell CPT USARMY NG DCARNG (USA) <lejuan.t.strickland.mil@army.mil>

Cc: Berlin, Adam J COL USARMY NG DCARNG (USA) <adam.j.berlin.mil@army.mil>; Currier, Benjamin P LTC USARMY NG NG GC (USA) <benjamin.p.currier.mil@army.mil>; GRANDPIERRE, PAUL LTC USARMY NG DCARNG (USA) <paul.grandpierre.mil@army.mil>; Mayo, Christopher M (Chris) Lt Col USAF NGB IG (USA) <christopher.m.mayo.mil@army.mil>

Good afternoon, MAJ Strickland. I trust this email finds you well. I wanted to immediately communicate an issue concerning my attendance at the Direct Commissioning Course (DCC). As you might already be aware, I was unable to meet the report time for DCC scheduled for today at 1200.

I've been in touch with the cadre at DCC, apprising them of my situation. Their feedback indicates that if I cannot make it today, joining the ongoing class at a later date will not be an option. The subsequent

military's current legal posture.

I feel it's pertinent to mention that the Department of Justice (DoJ) will be made aware of this situation come Monday morning. This notification is likely to initiate a series of events that could be intricate and, candidly, rather challenging.

I wanted to give you a heads up, not only to keep you informed but to ensure that you and the team have ample time to notify all necessary stakeholders. It's paramount that everyone remains informed to facilitate a coherent and coordinated approach to address this situation.

I've included COL Berlin, LTC Currier, LTC Garndpierre, and LTC Mayo in this communication for their situational awareness.

Thank you for your understanding, and I remain available for any further discussions or clarifications that may be needed.

Very Respectfully,

**NICK HARRISON, JD, MBA, PMP**

Managing Partner (DC Bar #1024439)

Harrison-Stein, PC

601 Pennsylvania Avenue NW

South Building, Suite 900

Washington, DC 20004-3647

Office: (202) 434-8292

Cell: (202) 297-5057

# **Exhibit 8**

**RE: Coordination for DTS Profile, GTC Application & Course Scheduling**

Jackson, Frank E SFC USARMY NG DCARNG (USA) <frank.e.jackson.mil@army.mil>

Tue 8/22/2023 2:06 PM

To: Berlin, Adam J COL USARMY NG DCARNG (USA) <adam.j.berlin.mil@army.mil>; Nick Harrison <nick@harrison-stein.com>

Cc: Currier, Benjamin P LTC USARMY NG NG GC (USA) <benjamin.p.currier.mil@army.mil>  
Sir (COL B):

Per MEDDET 1SG, the next available PHA opportunity for M-day personnel is the Mass PHA in November.

-SFC Jackson  
NGB-LSO  
m:703.987.7100  
o: 202.685.9845

---

**From:** Berlin, Adam J COL USARMY NG DCARNG (USA) <adam.j.berlin.mil@army.mil>  
**Sent:** Tuesday, August 22, 2023 1:09 PM  
**To:** Jackson, Frank E SFC USARMY NG DCARNG (USA) <frank.e.jackson.mil@army.mil>; Nick Harrison <nick@harrison-stein.com>  
**Cc:** Currier, Benjamin P LTC USARMY NG NG GC (USA) <benjamin.p.currier.mil@army.mil>  
**Subject:** RE: Coordination for DTS Profile, GTC Application & Course Scheduling

Thanks, SFC Jackson. Let's get 1LT Harrison connected with MEDDET. They should be able to perform a PHA or most aspects of it during the next drill weekend, or sooner in some cases.

---

**From:** Jackson, Frank E SFC USARMY NG DCARNG (USA) <[frank.e.jackson.mil@army.mil](mailto:frank.e.jackson.mil@army.mil)>  
**Sent:** Tuesday, August 22, 2023 1:07 PM  
**To:** Nick Harrison <[nick@harrison-stein.com](mailto:nick@harrison-stein.com)>; Berlin, Adam J COL USARMY NG DCARNG (USA) <[adam.j.berlin.mil@army.mil](mailto:adam.j.berlin.mil@army.mil)>  
**Cc:** Currier, Benjamin P LTC USARMY NG NG GC (USA) <[benjamin.p.currier.mil@army.mil](mailto:benjamin.p.currier.mil@army.mil)>  
**Subject:** RE: Coordination for DTS Profile, GTC Application & Course Scheduling

Good Afternoon, Sir:

FYSA....

DTS - You currently have a DTS Profile...but still need to do the following:

1. Contact the DTS Helpdesk (571.372.1300 or 888.435.7146) to re-set your profile.

2. You will then need to now follow the Self Registration instructions to link your SSN to your Profile. Enter the letter "R" after your SSN to avoid an error message. Also, do NOT check National Guard or Reserve

TC - Per JFHQ, you should have received an email (on or about August 11th) from MAJ Strickland, ...with pdf online process for GTC application. The system is not currently showing that it has been completed. Once submitted, turn-around time is approximately seven (7) days.

-DCC - It has been brought to my attention that re-scheduling your course cannot occur until a few prerequisites on the TRADOC pre-execution checklist are addressed:

1. Updated PHA – Last: 20211107 (currently DRC-4, MRC-3) | Next unit PHA is scheduled for November IDT, at Armory.
2. Passing HT/WT – Last: 20200801 | This can be done as early as next week, at Armory.
3. Passing ACFT – Last: None | JFHQ has an ACFT scheduled for September IDT, and LSO is scheduled for October IDT (Specker Gym – Ft. Belvoir).

If you have further questions, just let me know.

-SFC Jackson  
NGB-LSO  
m:703.987.7100  
o: 202.685.9845

---

**From:** Jackson, Frank E SFC USARMY NG DCARNG (USA)  
**Sent:** Tuesday, August 22, 2023 7:28 AM  
**To:** Nick Harrison <[nick@harrison-stein.com](mailto:nick@harrison-stein.com)>; Berlin, Adam J COL USARMY NG DCARNG (USA) <[adam.j.berlin.mil@army.mil](mailto:adam.j.berlin.mil@army.mil)>  
**Cc:** Currier, Benjamin P LTC USARMY NG NG GC (USA) <[benjamin.p.currier.mil@army.mil](mailto:benjamin.p.currier.mil@army.mil)>  
**Subject:** RE: Coordination for DTS Profile, GTC Application & Course Scheduling

1LT Harrison:

Good Morning, Sir. This week is not the best for me to meet at the Armory. That said, the POC for DTS/GTC should be. I will make contact, and follow-up later today.

Respectfully,

SFC Jackson, Frank  
Detachment NCOIC  
NGB-Legal Support Office, DCARNG  
2001 East Capitol Street, SE  
Washington, DC 20003  
Ofc: 202.685.9845

---

**From:** Nick Harrison <[nick@harrison-stein.com](mailto:nick@harrison-stein.com)>  
**Sent:** Monday, August 21, 2023 12:39 PM  
**To:** Berlin, Adam J COL USARMY NG DCARNG (USA) <[adam.j.berlin.mil@army.mil](mailto:adam.j.berlin.mil@army.mil)>; Jackson, Frank E SFC USARMY NG DCARNG (USA) <[frank.e.jackson.mil@army.mil](mailto:frank.e.jackson.mil@army.mil)>

Cc: Currier, Benjamin P LTC USARMY NG NG GC (USA) <[benjamin.p.currier.mil@army.mil](mailto:benjamin.p.currier.mil@army.mil)>

Subject: [Non-DoD Source] Coordination for DTS Profile, GTC Application & Course Scheduling

Thank you for the guidance, sir. I'll coordinate with SFC Jackson to ensure my DTS profile is set up and to check on my GTC application.

SFC Jackson, please let me know when you're available this week at the Armory. Let's find a time that works for both of us.

Thank you for facilitating this process, sir.

Very Respectfully,

**NICK HARRISON, JD, MBA, PMP**

Managing Partner (DC Bar #1024439)

Harrison-Stein, PC

601 Pennsylvania Avenue NW

South Building, Suite 900

Washington, DC 20004-3647

Office: (202) 434-8292

Cell: (202) 297-5057

---

**From:** Berlin, Adam J COL USARMY NG DCARNG (USA) <[adam.j.berlin.mil@army.mil](mailto:adam.j.berlin.mil@army.mil)>

**Sent:** Sunday, August 20, 2023 9:28 PM

**To:** Jackson, Frank E SFC USARMY NG DCARNG (USA) <[frank.e.jackson.mil@army.mil](mailto:frank.e.jackson.mil@army.mil)>

**Cc:** Nick Harrison <[nick@harrison-stein.com](mailto:nick@harrison-stein.com)>; Currier, Benjamin P LTC USARMY NG NG GC (USA)

<[benjamin.p.currier.mil@army.mil](mailto:benjamin.p.currier.mil@army.mil)>

**Subject:** In-processing for 1LT Harrison

Good morning, SFC Jackson,

I hope you had a good weekend. I'm writing to request your assistance with 1LT Harrison's in-processing. He was scheduled to report to DCC last week (with JAOBC to follow), but administrative challenges prevented him from reporting as originally planned. Among his needs are a DTS profile, a gov credit card (he applied), and getting clarity on the next DCC and JAOBC schedule. We can work with NGB and TJAGLCS to get him to the next set of courses, but please call the schoolhouse this week for the specific dates.

To move things forward, 1LT Harrison is ready and available to visit the Armory to knock out these steps with your

Thanks for your efforts, gentlemen. Much appreciated.

V/r,  
COLAB

# **Exhibit 9**

## **RE: Follow-Up on Previous Communication: Annual Training Orders & Employment Situation**

Berlin, Adam J COL USARMY NG DCARNG (USA) <adam.j.berlin.mil@army.mil>

Thu 8/31/2023 11:31 PM

To: Nick Harrison <nick@harrison-stein.com>; Currier, Benjamin P LTC USARMY NG NG GC (USA) <benjamin.p.currier.mil@army.mil>; GRANDPIERRE, PAUL LTC USARMY NG DCARNG (USA) <paul.grandpierre.mil@army.mil>

Cc: Jackson, Frank E SFC USARMY NG DCARNG (USA) <frank.e.jackson.mil@army.mil>

1LT Harrison,

We received both emails and began examining your request yesterday. Although we began considering the matter before you sent your second email, we do not yet have an answer. Please know that DCNG (full and m-day) will address your concerns as soon as able. It is a matter of money and mission.

Another pressing concern is activating your army.mil email account where we can move future communications. Do you recall when you last used it and had access?

COL AB

**From:** Nick Harrison <nick@harrison-stein.com>

**Sent:** Thursday, August 31, 2023 3:47 PM

**To:** Berlin, Adam J COL USARMY NG DCARNG (USA) <adam.j.berlin.mil@army.mil>; Currier, Benjamin P LTC USARMY NG NG GC (USA) <benjamin.p.currier.mil@army.mil>; GRANDPIERRE, PAUL LTC USARMY NG DCARNG (USA) <paul.grandpierre.mil@army.mil>

**Subject:** [Non-DoD Source] Re: Follow-Up on Previous Communication: Annual Training Orders & Employment Situation

Good afternoon, sirs. I hope this e-mail finds you all well.

I am following up on the subject of completing my Annual Training (AT) for this year. MAJ Strickland has advised me to coordinate with my Officer in Charge (OIC) to ascertain the availability of funds for executing AT orders in late September.

Given that my current employment will conclude on September 8, I am looking to utilize the last three weeks of September for this training. This would align me closely with the October class date, provided that a Periodic Health Assessment (PHA) can also be scheduled and completed in a timely fashion.

I understand that as we approach the close of the fiscal year, Finance often begins the process of reclaiming unused funds. This may present some challenges that require additional coordination and effort. However, I believe there is a moral obligation address this issue.

I also suspect that senior leadership (across the river) may be motivated to mitigate any negative impact arising from the lack of official orders or travel arrangements which caused the missed training date. This situation could potentially offer the DC National Guard an opening to seek increased flexibility.

Your guidance and support in this matter would be greatly appreciated. Could we possibly discuss the best way to navigate this situation considering the fiscal year-end financial constraints?

Thank you for your attention to this matter.

Very Respectfully,

**NICK HARRISON, JD, MBA, PMP**

Managing Partner (DC Bar #1024439)

Harrison-Stein, PC

601 Pennsylvania Avenue NW

South Building, Suite 900

Washington, DC 20004-3647

Office: (202) 434-8292

Cell: (202) 297-5057

---

**From:** Nick Harrison <[nick@harrison-stein.com](mailto:nick@harrison-stein.com)>

**Sent:** Tuesday, August 29, 2023 11:21 AM

**To:** Strickland, Lejuan Terrell MAJ USARMY NG DCARNG (USA) <[lejuan.t.strickland.mil@army.mil](mailto:lejuan.t.strickland.mil@army.mil)>; Berlin, Adam J COL USARMY NG DCARNG (USA) <[adam.j.berlin.mil@army.mil](mailto:adam.j.berlin.mil@army.mil)>; Currier, Benjamin P LTC USARMY NG NG GC (USA) <[benjamin.p.currier.mil@army.mil](mailto:benjamin.p.currier.mil@army.mil)>; GRANDPIERRE, PAUL LTC USARMY NG DCARNG (USA) <[paul.grandpierre.mil@army.mil](mailto:paul.grandpierre.mil@army.mil)>; Mayo, Christopher M (Chris) LTC USARMY NG DCARNG (USA) <[christopher.m.mayo.mil@army.mil](mailto:christopher.m.mayo.mil@army.mil)>

**Cc:** Koroma, Mariatu R 1SG USARMY NG DCARNG (USA) <[mariatu.r.koroma.mil@army.mil](mailto:mariatu.r.koroma.mil@army.mil)>; Washington, Terrence O SFC USARMY NG DCARNG (USA) <[terrence.o.washington.mil@army.mil](mailto:terrence.o.washington.mil@army.mil)>; Jackson, Frank E SFC USARMY NG DCARNG (USA) <[frank.e.jackson.mil@army.mil](mailto:frank.e.jackson.mil@army.mil)>

**Subject:** Re: Follow-Up on Previous Communication: Annual Training Orders & Employment Situation

Thank you for your guidance, sir. I understand that it's contingent on the permission from my OIC and the availability of funds at this stage in the Fiscal Year.

As soon as I receive confirmation about the availability of funds and approval from my OIC, I will proceed to fill out an RFO form and develop a work plan for what will be accomplished during the two-week AT period.

Very Respectfully,

**NICK HARRISON, JD, MBA, PMP**

Managing Partner (DC Bar #1024439)

Harrison-Stein, PC

601 Pennsylvania Avenue NW

South Building, Suite 900

Washington, DC 20004-3647

Office: (202) 434-8292

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**From:** Strickland, Lejuan Terrell MAJ USARMY NG DCARNG (USA) <[lejuan.t.strickland.mil@army.mil](mailto:lejuan.t.strickland.mil@army.mil)>

**Sent:** Tuesday, August 29, 2023 10:46 AM

**To:** Nick Harrison <[nick@harrison-stein.com](mailto:nick@harrison-stein.com)>; Berlin, Adam J COL USARMY NG DCARNG (USA) <[adam.j.berlin.mil@army.mil](mailto:adam.j.berlin.mil@army.mil)>; Currier, Benjamin P LTC USARMY NG NG GC (USA) <[benjamin.p.currier.mil@army.mil](mailto:benjamin.p.currier.mil@army.mil)>; GRANDPIERRE, PAUL LTC USARMY NG DCARNG (USA) <[paul.grandpierre.mil@army.mil](mailto:paul.grandpierre.mil@army.mil)>; Mayo, Christopher M (Chris) Lt Col USAF NGB IG (USA) <[christopher.m.mayo.mil@army.mil](mailto:christopher.m.mayo.mil@army.mil)>

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**Subject:** Re: Follow-Up on Previous Communication: Annual Training Orders & Employment Situation

1LT Harrison,

I hope all is well. Completing your AT is something you can do with funds are available this late in the FY. You will need to fill out an RFO form and develop a work plan for what you will accomplish during those two weeks.

Break

SFC Washington,

Can you make sure 1LT Harrison has the updated RFO form?

Very Respectfully,

MAJ Strickland

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**From:** Nick Harrison <[nick@harrison-stein.com](mailto:nick@harrison-stein.com)>

**Sent:** Monday, August 28, 2023 4:40 PM

**To:** Berlin, Adam J COL USARMY NG DCARNG (USA) <[adam.j.berlin.mil@army.mil](mailto:adam.j.berlin.mil@army.mil)>; Currier, Benjamin P LTC USARMY NG NG GC (USA) <[benjamin.p.currier.mil@army.mil](mailto:benjamin.p.currier.mil@army.mil)>; GRANDPIERRE, PAUL LTC USARMY NG DCARNG (USA) <[paul.grandpierre.mil@army.mil](mailto:paul.grandpierre.mil@army.mil)>; Mayo, Christopher M (Chris) Lt Col USAF NGB IG (USA) <[christopher.m.mayo.mil@army.mil](mailto:christopher.m.mayo.mil@army.mil)>

**Cc:** Strickland, Lejuan Terrell MAJ USARMY NG DCARNG (USA) <[lejuan.t.strickland.mil@army.mil](mailto:lejuan.t.strickland.mil@army.mil)>; Koroma, Mariatu R 1SG USARMY NG DCARNG (USA) <[mariatu.r.koroma.mil@army.mil](mailto:mariatu.r.koroma.mil@army.mil)>; Washington, Terrence O SFC USARMY NG DCARNG (USA) <[terrence.o.washington.mil@army.mil](mailto:terrence.o.washington.mil@army.mil)>; Jackson, Frank E SFC USARMY NG DCARNG (USA) <[frank.e.jackson.mil@army.mil](mailto:frank.e.jackson.mil@army.mil)>

**Subject:** [Non-DoD Source] Follow-Up on Previous Communication: Annual Training Orders & Employment Situation

Good evening, sir. I hope this message finds you well. I wanted to update you further regarding my employment situation in the context of our previous discussions.

As of September 8, my company has decided to release me from my position. There were ongoing challenges with several Business Analyst roles on the contract, and I believe that my initial notification about attending the IAG School was a catalyst for them to restructure the contract. Unfortunately, as we discussed and as you're well aware, the protections under the Servicemembers Civil Relief Act (SCRA) could not be invoked due to the absence of official orders.

During our last telephonic conversation, you had brought up the prospect of placing me on Annual Training orders while we navigate this transitional phase. If this is still an actionable route, I'd like to explore the possibility of initiating these orders post-September 8. This would significantly aid in bridging the gap between my last day at the company and the forthcoming Direct Commission Course (DCC) rescheduling.

For ease of co

Thank you for taking the initiative to communicate with SFC Jackson about the PHA disconnect. I truly appreciate your support and attention in this matter.

For your situational awareness, I am considering requesting AT orders soon to proactively address the pending requirements and alleviate the prevailing ambiguity. This uncertainty has unfortunately led to palpable tension in my civilian job.

The situation at my workplace is as such: Even though they don't strictly require my services for the current project, the prolonged ambiguity concerning my National Guard duties has had some tangible implications. Following my initial notification to them about the anticipated four-month training (which in the context of a contract-based role is almost akin to submitting a resignation), they reallocated tasks away from me, and the workload hasn't been redistributed back in my direction.

The lack of clarity on the rescheduling has exacerbated the situation, and, to further complicate matters, the Servicemembers Civil Relief Act (SCRA) protections do not come into play until I can provide a definitive set of military orders. Hence, my position has become somewhat precarious. I have done my best to keep them informed with the limited information available to me. However, a scheduled one-on-one meeting with my project supervisor this Friday makes me anticipate that this will be a focal point of our conversation.

I wanted to keep you informed of the dynamics at play, so you have a complete picture of the challenges I am navigating. Your understanding and continued support mean a great deal to me and I appreciate your efforts.

Very Respectfully,

**NICK HARRISON, JD, MBA, PMP**

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