



**BANNEKER VENTURES**

April 3, 2013

**VIA EMAIL (STACIE.PITTELL@DC.GOV)**

Stacie Pittell, General Counsel  
Board of Ethics and Government Accountability  
District of Columbia  
One Judiciary Square  
441 4<sup>th</sup> Street, NW, Suite 830 South  
Washington, DC 20001

Dear Ms. Pittell:

As a follow-up to our call on Friday and pursuant to the D.C. Freedom of Information Act (the "Act"), D.C. Code § 2-531, et seq., I hereby request disclosure of the following records:

- All investigative files, records, memorandums, memorandums of interview, notes of investigation (both handwritten and typed) and other documents related to any and all BEGA investigations concerning the conduct of District of Columbia Ward One Councilmember Jim Graham concerning his conduct while serving as a member of the Washington Metropolitan Area Transit Authority Board of Directors.
- This includes, but is not limited to, BEGA Case No. AI-002-12; case closing memorandums, criminal referrals, documents provided by Cadwalader, Wickersham & Taft LLP in connection with the BEGA investigation of Jim Graham, and all other pertinent documents contained therein.

If you regard any of the requested records as subject to exemption from required disclosure under the Act, I hereby request that you exercise your discretion and disclose them nonetheless.

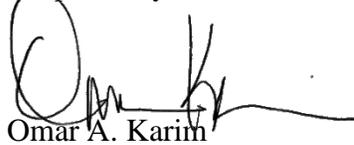
If you decide to withhold any requested records, please be aware of the specific requirements under D.C. Code § 2-534(b) that you provide any reasonable segregable portion of a requested record after redacting those portions claimed to be exempt, explain in writing the justification for redacting the record, indicate the extent of any redactions on the portion of the record which is made available or published (except in limited circumstances), and, where technically feasible, indicate on the redacted portion itself the specific exemption(s) claimed.

I further request that you disclose the requested records, as they become available to you, without waiting until all of the records are assembled.

I am requesting these records on behalf of Banneker Ventures in anticipation of providing testimony before public courts of the District of Columbia. Accordingly, I request that you waive all fees in the public interest because the furnishing of the information sought by this request will primarily benefit the public and is likely to contribute significantly to public understanding of Jim Graham's and WMATA's actions. If, however, you decline to waive all fees, I am prepared to pay according to the fee schedule set forth in D.C. Mun. Regs. Title 1, §408, but request that you notify me if you expect these fees to exceed \$500.00.

If you have any questions, please do not hesitate to contact me at (202) 393-5460. I look forward to your response within 15 days (excluding weekends and legal holidays).

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Omar A. Karim'. The signature is stylized with a large initial 'O' and a long horizontal flourish extending to the right.

Omar A. Karim