

Neal A. Puckett, Esq.
Lic: VA

Haytham Faraj, Esq.
Lic: IL, MI, DC



Eric S. Montalvo, Esq.
Lic: NJ, PA, DC

Debra A. D'Agostino, Esq.
Lic: NY

THE LAW FIRM OF PUCKETT AND FARAJ, PC

February 2, 2011

Via FEDEX
Via Facsimile 760-725-6971

Commanding Officer
Col D.R. Wright
1 MHG, IMEF
Camp Pendleton, CA 92055

Re: U.S. v. Card; Request to conduct a site visit

Dear Col Wright,

I represent Major Edward Card (Ted) in the charges preferred against him on January 18, 2011. I am writing to request that you authorize myself, Maj Card, his detailed military counsel and a defense clerk travel to the locus of the alleged event. The travel authorization should also permit our defense team access to the site of the IED and the site of alleged shooting by Maj Card.

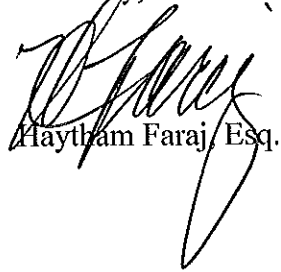
The reason for this request is because the charges against Maj Card allege serious and substantial allegations of first degree murder. The seriousness of the charges, age of the alleged violations, number of witnesses and location of the alleged offenses, make this a very complex and difficult case to defend. Our task is made doubly challenging by the fact that Maj Card suffers from limited amnesia that makes recollection of the facts surrounding the events alleged impossible.

While it is not common for commands to authorize site visits during the pre-Article 32 phase of the military justice process, it is not unheard of. Any expense that the command expends at this stage of the trial will have to be expended in the course of pretrial preparations.

By allowing travel at this stage of the case you will be allowing us an opportunity to present a complete defense case before the Investigating Officer resulting in a more thorough investigation. A more thorough investigation may result in the IO recommending that charges not be referred to a court martial which will prevent a lengthy pretrial and trial process, continued disruption of Maj Card's personal and professional life, and the countless man hours and funds that will be expended to try this case. If, on the other hand, the IO decides that charges should be referred to a court martial, a trip now will negate the need for a future site visit.

My office contact information is below. I may also be reached on my cell phone at 760-521-7934. I look forward to your favorable response.

Sincerely,



Haytham Faraj, Esq.

Copy to:
Staff Judge Advocate, I MEF
Trial Counsel
Detailed Counsel
Client
File