

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

ROBERT MORSS

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CRIMINAL NUMBER 21-40-5

**DEFENDANT’S RESPONSE TO THE GOVERNMENT’S
MOTION FOR PRE-TRIAL DETENTION**

Defendant Robert Morss, by and through his undersigned attorneys, hereby opposes the government’s Motion for Pre-trial Detention and respectfully moves the Court, pursuant to 18 U.S.C. §§ 3142(e) and 3145(b), to release him pending trial. The rule of equity weighs in favor of granting Mr. Morss’s pretrial release in light of his lack of criminal history, exemplary military service, and strong family support. Mr. Morss is neither a flight risk, nor a risk of danger to his community. Monitoring, along with other conditions of release, reasonably will assure Mr. Morss’s future appearances before this Court and the safety of other persons and the community.

I. PROCEDURAL HISTORY

On June 10, 2021, the government filed a criminal complaint against Mr. Morss, charging him with several offenses related to the breach of the Capitol on January 6, 2021. Mr. Morss was subsequently arrested in Glenshaw, Pennsylvania on June 11, 2021. Mr. Morss stipulated to pretrial detention pending his transfer to the District of Columbia before a U.S. Magistrate Judge in the Western District of Pennsylvania. On June 16, 2021, Mr. Morss was indicted on three counts of robbery, in violation of 18 U.S.C. § 2111, two counts of assaulting a

federal officer, in violation of 18 U.S.C. § 111(a), one count of obstructing an official proceeding, in violation of 18 U.S.C. § 1512(c)(2), one count of committing certain acts during civil disorder, in violation of 18 U.S.C. § 231(a)(3), on count of disorderly conduct in a Capitol Building, in violation of 40 U.S.C. § 5104(e)(2)(D), and one count of committing an act of violence in the Capitol Building, in violation of 40 U.S.C. § 5104(e)(2)(F). A detention hearing is scheduled for July 13, 2021.

II. DISCUSSION

Mr. Morss opposes the government's Motion for Pre-Trial Detention and seeks an order releasing him to his apartment, where he resides with his mother, on conditions. Utilizing the "default rule favoring liberty," Mr. Morss should be released pre-trial. *United States v. Cua*, No. 21-107, 2021 U.S. Dist. LEXIS 44293, at *23 (D.D.C. Mar. 10, 2021) (granting defendant's release to custody of parents in insurrection case involving, among other charges, assault with dangerous weapon). Indeed, "[o]ur system of criminal justice embraces a strong presumption against detention." *United States v. Hassanshahi*, 989 F. Supp.2d 110, 113 (D.D.C. 2013) (quoting *United States v. Hanson*, 613 F.Supp.2d 85, 87 (D.D.C. 2009)). "In our society liberty is the norm, and detention prior to trial or without trial is the carefully limited exception." *Id.* (quoting *United States v. Salerno*, 481 U.S.739, 755 (1987)).

The government has moved for Mr. Morss' detention pursuant to 18 U.S.C. 3142(f)(1)(A), alleging that he is charged with a crime of violence. As such, this Court is tasked with deciding whether there is any condition or combination of conditions which can assure his future appearances in Court while ensuring the safety of other individuals and the community. 18 U.S.C. § 3142(f). In light of the guiding principles set forth above, Mr. Morss should be released pending trial because he is not a flight risk or danger to the community.

A. The Government Cannot Prove by a Preponderance of the Evidence That Mr. Morss Poses a Serious Risk of Flight.

There is no serious risk that Mr. Morss will flee if released on bail – a point the government appears to concede in admitting that his lack of criminal history and community ties weigh in favor of release and advancing no real argument that he poses a flight risk. *See* Gov’t Mot. 34, ¶ 66. “In evaluating the likelihood of flight, the potential penalty has merit, but . . . the stability of [defendant’s] relationship to the community” is much more persuasive. *White v. United States*, 412 F.2d 145, 147 (D.C. Cir. 1968).

The preponderance of evidence in this case establishes that Mr. Morss does not “pose[] a risk of flight or nonappearance[.]” *See United States v. Xulam*, 84 F.3d 441, 442 (D.C. Cir. 1996) (“[W]hen the government seeks pretrial detention of an individual on the ground that he poses a risk of flight, the standard it must satisfy is a ‘preponderance of evidence.’” (citation omitted)). Mr. Morss has strong ties to his community, including his vast history as a volunteer, and stable home in Pennsylvania, which is where he attended college and has been living. Although he originally hails from Nevada, Mr. Morss’s mother, Anela Morss, has retired from her professional career and moved into Mr. Morss’s apartment in Glenshaw, Pennsylvania to support him. She has an advanced degree in special and alternative education and possesses unique skills to assist her son in beginning counseling for his Post Traumatic Stress Disorder which he has been inflicted with due to his four tours of combat duty in Afghanistan. Moreover, Mr. Morss has no prior criminal record. All of these factors weigh heavily in favor of release.

B. The Government Cannot Prove By Clear and Convincing Evidence That Mr. Morss Presents an Identified and Articulable Threat to an Individual or the Community.

Outside of the unique set of circumstances that drew Mr. Morss to Washington, D.C. on January 6th, he does not present any specific and identifiable threat to any individual or his

community. “To justify detention . . . [based on] dangerousness, the government must prove by ‘clear and convincing evidence’ that ‘no condition or combination of conditions will reasonably assure the safety of any other person in the community.’” *United States v. Munchel*, 991 F.3d 1273, 1279-80 (D.C. Cir. 2021) (citations omitted); *see also* 18 U.S.C. § 3142(f). In assessing whether Mr. Morss must be detained on the basis of dangerousness, the Court considers the following factors: “(1) the nature and circumstances of the offense charged . . .; (2) the weight of the evidence against the person; (3) the history and characteristics of the person . . .; and (4) the nature and seriousness of the danger to any person or the community that would be posed by the person’s release.” 18 U.S.C. § 3142(g). On balance, weighing these factors against the backdrop of the notion that “[i]n our society liberty is the norm, and detention prior to trial or without trial is the carefully limited exception[,]” Mr. Morss does not pose a “concrete, prospective threat to public safety.” *Munchel*, 991 F.3d at 1279, 1280.

1. Nature and circumstances of the offense charged.

In considering the nature and circumstances of the offense charged, the Court considers whether the offense charged is a crime of violence. 18 U.S.C. § 3142(g)(1). Mr. Morss is charged with two counts of assaulting, resisting, or impeding certain officers, in violation of 18 U.S.C. §§ 111(a)(1) and (2). The government has not argued that these offenses constitute a crime of violence. Gov’t Supp. Mem. in Supp. of Mot. for Pre-Trial Det. ¶¶ 1-2. The government’s sole argument is that the three counts of robbery filed against Mr. Morss, in violation of 18 U.S.C. § 2111, constitutes a crime of violence under the Bail Reform Act.

“As relevant here, a ‘crime of violence’ is either: (A) an offense that has as an element of the offense the use, attempted use, or threatened use of physical force against the person or property of another; [or] (B) any other offense that is a felony and that, by its nature, involves a

substantial risk that physical force against the person or property of another may be used in the course of committing the offense.” *United States v. Sabol*, No. 21-35-1, 2021 U.S. Dist. LEXIS 71836, at *16-17 (D.D.C. Apr. 14, 2021) (quoting 18 U.S.C. § 3156(a)(4)(A)-(B)). A similar statute, 18 U.S.C. § 92(e)(2)(B)(i), has been interpreted as requiring “violent force—that is, force capable of causing physical pain or injury to another person.” *Id.* at *17 (quoting *Johnson v. United States*, 559 U.S. 133, 140 (2010)). Courts utilize the traditional categorical approach – looking to the elements of the charged crime rather than defendant’s conduct, unless the statute is divisible and defines multiple crimes, in which case the Court can utilize the modified categorical approach and review documents such as the indictment. *Id.* (citing *United States v. Singleton*, 182 F.3d 7, 10-12 (D.C. Cir. 1999); *Mathis v. United States*, 136 S. Ct. 2243, 2249 (2016)).

The government has correctly identified the Circuit Courts of Appeal which have held that robbery under 18 U.S.C. § 2111 is categorically a crime of violence. *See, e.g. United States v. Shirley*, 808 Fed. App’x 672 (10th Cir. 2020); *United States v. Fultz*, 923 F.3d 1192, 1193 (9th Cir. 2019). However, the designation of robbery as a crime of violence does not mandate detention, it merely renders Mr. Morss eligible for it.

Nor does the D.C. Circuit’s decision in *United States v. Munchel*, 991 F.3d 1273 (D.C. Cir. 2021) mandate detention. The D.C. Circuit recently clarified that “[t]he point of *Munchel* was that everyone who entered the Capitol on January 6 did not necessarily pose the same risk of danger and the preventive detention statute should apply to the January 6 defendants the same as it applies to everyone else, not that the January 6 defendants should get the special treatment of an automatic exemption from detention if they did not commit violence on that particular day.” *United States v. Hale-Cusanelli*, --- F.4d ---, 2021 U.S. App. LEXIS 20071, at *16 (D.C. Cir.

July 7, 2021). Thus, remaining faithful to the application of the Bail Reform Act's factors, no *per se* rules apply to January 6 defendants based on whether they committed acts of violence in the Capitol Building.

The charged offenses are undoubtedly serious. There is no evidence to support that he coordinated or planned with anyone on that particular day. Mr. Morss was present at the Capital and seen at various times on video. During his time at the Capital, he got caught up in the frenzy of the protest and acted out spontaneously. There is no evidence that he brought a firearm to the Capital. The three firearms recovered from his apartment subsequent to his arrest have since been removed from Mr. Morss's apartment and locked in storage containers in his parents' home in Sparks, Nevada, thousands of miles from his residence in Pennsylvania.

2. Weight of the evidence against Mr. Morss.

Although there is ample video evidence in this case, “[e]ven overwhelming evidence of guilt” does not amount to “clear and convincing evidence that no conditions of release can reasonably assure the safety of the community.” *United States v. Taylor*, 289 F. Supp.3d 55, 66 (D.D.C. 2018) (instructing court must “review the weight of the evidence against the defendant as an indicia of whether any conditions of pretrial release will reasonably assure the safety of the community”). There are conditions of release to assure the safety of Mr. Morss's community.

3. History and characteristics of Mr. Morss.

In considering the history and characteristics of Mr. Morss, the Court must take into account “the person's character, physical and mental condition, family ties, employment, financial resources, length of residence in the community, community ties, past conduct, history relating to drug or alcohol abuse, criminal history, and record concerning appearance at court proceedings” 18 U.S.C. § 3142(g)(3)(A). This factor weighs heavily in favor of release.

Mr. Morss is a 28 -year old combat veteran with no prior criminal history and thus, no record of failing to appear for court. Mr. Morss was honorably discharged from the Army after enlisting right after graduating high school at age 17 and serving three combat tours of duty in Afghanistan. He received numerous medals of honor for his exemplary service.

He is also a recent graduate of Penn State University with a degree in education. He worked as a Veterans Administration Work Study student while attending school and received exemplary reviews from his Office Manager. He completed a student-teaching assignment in the fall of 2020 at Shaler Area Middle School and received outstanding reviews from his supervisory teacher in the Social Studies Department. In particular, his supervising teacher praised him for using his technological knowledge to help implement a hybrid remote curriculum to accommodate learning during the pandemic, as well as his preparation and ability to adjust his teaching methods to students with varying needs. The Supervisor of Student Teachers at Penn State gave Mr. Morss similar reviews as an outstanding student, communicator, and lauded his professionalism.

Although he is not originally from Pennsylvania, he has significant ties to the community after having attended college there and deciding to reside in Glenshaw. He has full family support, including his mother's, who recently retired and moved from Nevada to live in his apartment and support him throughout the pendency of this case. She is fully committed to supporting him in receiving treatment for his mental health issues. Mr. Morss is also actively involved in his community as evidenced by his volunteer work with the Travis Manion Foundation, which develops programs, training opportunities, and events for veterans and families. *See*, Travis Manion Foundation, *Who We Are*, located at: <https://www.travismanion.org/about-us/who-we-are/>. Defense exhibits C through E evidence his

efforts his completion of a mural commemorating the Cloyd K. Davis American Legion's Post 150 in Petersburg, Pennsylvania 100th anniversary. The 10- panel painting pays tribute to America's veterans who served over the past 244 years, from the revolution War to the battles in the Middle East. Mr. Morss worked tirelessly for 7 months, along with other Penn State students he recruited to complete the mural in time for its August 1, 2020 unveiling.

With respect to Mr. Morss physical and mental condition, Mr. Morss reports having suffered physical injuries which have left him with a hearing deficit, and Post Traumatic Stress Disorder ("PTSD") as a result of his combat experience in Afghanistan. He has never sought therapy or treatment for his resultant mental health issues. Mr. Morss is fully committed to seeking treatment and complying with any mental health care condition this Court deems necessary.

4. Nature and seriousness posed by Mr. Morss's release.

The final factor to consider is the "nature and seriousness of the danger to any person or the community that would be posed by the person's release." 18 U.S.C. § 3142(4). When analyzing the nature and seriousness posed by Mr. Morss's release, the Court must consider whether the government has "proved by clear and convincing evidence that an arrestee *presents an identified and articulable threat* to an individual or the community . . ." *Munchel*, 991 F.3d at 1280. Indeed, the point of detention is to "disable the arrestee *from executing that threat*." *Id.* (quotation omitted). Although January 6 defendants charged with assaulting officers are viewed as being more potentially dangerous than those who merely "cheered on the violence or entered the Capitol after others cleared the way," *Munchel*, 991 F.3d at 1284, Mr. Morss is not charged with assault with a dangerous weapon under 18 U.S.C. § 111(a) and (b) like some of the January

6 defendants who have been detained pending trial, which speaks to a lesser degree of dangerousness on his part. *See, e.g. Sabol*, 2021 U.S. Dist. LEXIS 71836, at *11 & *69.

The Court also must consider the threat in context. *Munchel*, 991 F.3d at 1283. Here, when viewed in context, the only threat arguably presented by Mr. Morss is limited to the particular circumstances that transpired on January 6th. *See id.* Viewed within the context of January 6th, the evidence shows that Mr. Morss was caught up in the frenzy of the rally and protest. At most, one could assume *arguendo* that Mr. Morss might pose a danger to, say, attempt to stop an act of Congress in the future, but this danger would require the same set of unique circumstances that occurred on January 6, 2021 – rally, protest, Congressional tally of votes – to take place again at some point in the future. This is simply too speculative a basis to make a specific finding of danger to any person or the community.

There is no clear and convincing evidence that Mr. Morss poses a specific danger to law enforcement if released. When considering the danger posed by a person’s release, it absolutely is appropriate to consider whether the individual will “engage in the *same kinds* of inherently dangerous and illegal activities” at issue in the particular case. *United States v. Wiggins*, -- F. Supp.3d --, 2020 WL 1868891, at *8 (D.D.C. Apr. 10, 2020) (holding defendant did not show by clear and convincing evidence that if he were released he would not engaged in the same kinds of dangerous activities) (emphasis added); *see also United States v. Lee*, 451 F. Supp.3d 1, 7-8 (D.D.C. 2020) (concluding the danger posed by the person’s release is the “risk that he will continue to engage in the *same types* of unlawful and potentially dangerous conduct”) (emphasis added)).

Here, there is no danger that Mr. Morss will engage in the same type of conduct in which he engaged on January 6th. Considering his “resources and capabilities,” *Munchel*, 991 F.3d at

1283, he has minimal financial resources as a recent college graduate and is willing to abide by any limitations or monitoring the Court may wish to order be placed on his electronic devices and social media accounts. Counsel is aware of no evidence that Mr. Morss created any social media posts threatening continued political violence. *See Cua*, 2021 U.S. Dist. LEXIS 44293, at *15-23 (granting release despite defendant's violent social media postings). Rather, the evidence shows Mr. Morss continued working full time as a substitute teacher at the Shaler Area Middle School. On June 11, 2021, almost six months after the events at the Capital, he was arrested in the morning outside his apartment on his way to work. Simply put, Mr. Morss's release poses no danger to his community.

The government places great emphasis on a notebook found in Mr. Morss's car with writings including "Step by Step To Create Hometown Militia," which included names, a list of equipment, a list of steps such as "Battle Drills," and notes about "Bring Body Kit/Body Armor," "Bring Assault Rifle," and "4 Magazines." Although the government's concern is understandable, Mr. Morss reports that he utilizes "journaling" in part as an outlet to express his trauma from serving in combat duty. It is notable that government agents did not recover any documentary evidence from social media postings or other electronic communications indicating that Mr. Morss was planning a specific attack for the future or planning anything for that matter. Even to the extent that the Court is concerned by the journal, it should not outweigh the extensive evidence showing that the community will remain safe if Mr. Morss is released. Conditions such as home monitoring, restrictions on travel, and restrictions or monitoring of his internet use would be more than adequate to ensure the community's safety. And, as noted above, Mr. Morss has already removed all firearms from his residence and agrees that he cannot purchase any new ones.

Viewing the nature and seriousness of the danger in context, it is clear that he posed no danger to his community before or after January 6th. Moreover, any risk concerns can be mitigated through any number of conditions of release. If, however, the Court considers the risk of danger in this case to be a close call, the decision regarding release should be “guided by the default rule favoring liberty.” *Cua*, 2021 U.S. Dist. LEXIS 44293, at *23.

III. CONCLUSION

For the foregoing reasons, defendant Robert Morss respectfully requests the Court deny the government’s Motion for Pre-Trial Detention and grant him release on appropriate conditions.

Respectfully submitted,

/s/ Kathleen M. Gaughan
KATHLEEN M. GAUGHAN
Assistant Federal Defender

/s/ Elizabeth L. Toplin
ELIZABETH L. TOPLIN
Assistant Chief, Trial Unit

CERTIFICATE OF SERVICE

We, Kathleen M. Gaughan, Assistant Federal Defender, and Elizabeth L. Toplin, Assistant Chief, Trial Unit, Federal Community Defender Office for the Eastern District of Pennsylvania, hereby certify that we caused a copy of the Defendant's Response to the Government's Motion for Pre-Trial Release to be filed and served electronically through the District of Columbia District Clerk's Office Electronic Case Filing upon Melissa Jackson, Assistant United States Attorney, United States Attorney's Office, 555 4th St., NW, Washington, DC 20530.

/s/ Kathleen M. Gaughan
KATHLEEN M. GAUGHAN
Assistant Federal Defender

/s/ Elizabeth L. Toplin
ELIZABETH L. TOPLIN
Assistant Chief, Trial Unit

DATE: July 12, 2021

Exhibit A

(DD214 of Robert Morss)

CAUTION: NOT TO BE USED FOR
IDENTIFICATION PURPOSESTHIS IS AN IMPORTANT RECORD.
SAFEGUARD IT.ANY ALTERATIONS IN SHADED AREAS
RENDER FORM VOID**CERTIFICATE OF RELEASE OR DISCHARGE FROM ACTIVE DUTY**

This Report Contains Information Subject to the Privacy Act of 1974, As Amended.

1. NAME (Last, First, Middle) MORSS, ROBERT ABRAHAM		2. DEPARTMENT, COMPONENT AND BRANCH ARMY/RA		3. SOCIAL SECURITY NUMBER [REDACTED]	
4a. GRADE, RATE OR RANK SPC	b. PAY GRADE E04	5. DATE OF BIRTH (YYYYMMDD) [REDACTED]		6. RESERVE OBLIGATION TERMINATION DATE (YYYYMMDD) 20181228	
7a. PLACE OF ENTRY INTO ACTIVE DUTY SACRAMENTO, CALIFORNIA		b. HOME OF RECORD AT TIME OF ENTRY (City and state, or complete address if known) 329 SHELBY DR SPARKS NEVADA 89436			
8a. LAST DUTY ASSIGNMENT AND MAJOR COMMAND 020075INHHC HHC RANGER SP			b. STATION WHERE SEPARATED JB LEWIS-MCCHORD, WA 98433-9500		
9. COMMAND TO WHICH TRANSFERRED USAR CON GP (REINF) 1600 SPEARHEAD DIVISION AVE, FT KNOX, KY 40122				10. SGLI COVERAGE <input type="checkbox"/> NONE AMOUNT: \$ 400,000.00	
11. PRIMARY SPECIALTY (List number, title and years and months in specialty. List additional specialty numbers and titles involving periods of one or more years.) 11C1P INDIRECT FIRE INFANTR - 4 YRS 0 MOS// NOTHING FOLLOWS		12. RECORD OF SERVICE		YEAR(S)	MONTH(S)
		a. DATE ENTERED AD THIS PERIOD		2011	08
		b. SEPARATION DATE THIS PERIOD		2015	12
		c. NET ACTIVE SERVICE THIS PERIOD		0004	04
		d. TOTAL PRIOR ACTIVE SERVICE		0000	00
		e. TOTAL PRIOR INACTIVE SERVICE		0000	00
		f. FOREIGN SERVICE		0000	09
		g. SEA SERVICE		0000	00
		h. INITIAL ENTRY TRAINING		0000	04
i. EFFECTIVE DATE OF PAY GRADE		2013	08		
13. DECORATIONS, MEDALS, BADGES, CITATIONS AND CAMPAIGN RIBBONS AWARDED OR AUTHORIZED (All periods of service) AFGHANISTAN CAMPAIGN MEDAL W/ CAMPAIGN STAR //ARMY ACHIEVEMENT MEDAL//ARMY GOOD CONDUCT MEDAL//NATIONAL DEFENSE SERVICE MEDAL// GLOBAL WAR ON TERRORISM SERVICE MEDAL//ARMY SERVICE RIBBON//NATO MEDAL//COMBAT INFANTRYMAN BADGE//PARACHUTIST BADGE// NOTHING FOLLOWS		14. MILITARY EDUCATION (Course title, number of weeks, and month and year completed) AIRBORNE, 3 WEEKS, 2012//COMBATIVES LEVEL 1, 1 WEEK, 2013//COMBATIVES LEVEL 2, 2 WEEKS, 2013//INDIRECT FIRE INFANTRYMAN, 6 WEEKS, 2012//RANGER ASSESSMENT AND SELECTION PROGRAM 1, 8 WEEKS, 2012//NOTHING FOLLOWS			
15a. COMMISSIONED THROUGH SERVICE ACADEMY				YES	X
b. COMMISSIONED THROUGH ROTC SCHOLARSHIP (10 USC Sec. 2107b)				YES	X
c. ENLISTED UNDER LOAN REPAYMENT PROGRAM (10 USC Chap. 109) (If Yes, years of commitment: NA)				YES	X
16. DAYS ACCRUED LEAVE PAID 0	17. MEMBER WAS PROVIDED COMPLETE DENTAL EXAMINATION AND ALL APPROPRIATE DENTAL SERVICES AND TREATMENT WITHIN 90 DAYS PRIOR TO SEPARATION		YES		NO
					X
18. REMARKS SUBJECT TO ACTIVE DUTY RECALL, MUSTER DUTY AND/OR ANNUAL SCREENING//BLOCK 6, PERIOD OF DELAYED ENTRY PROGRAM: 20101229-20110807//ENLISTMENT BONUS PAID: \$1800.00, 20110808// MEMBER HAS COMPLETED FIRST FULL TERM OF SERVICE//SERVED IN A DESIGNATED IMMINENT DANGER PAY AREA//SERVICE IN AFGHANISTAN FROM 20120627-20121024, 20130512-20130904, 20140328-20140518//NOTHING FOLLOWS					
The information contained herein is subject to computer matching within the Department of Defense or with any other affected Federal or non-Federal agency for verification purposes and to determine eligibility for, and/or continued compliance with, the requirements of a Federal benefit program.					
19a. MAILING ADDRESS AFTER SEPARATION (Include ZIP Code) 111 KAREN DR IRWIN PENNSYLVANIA 15642		b. NEAREST RELATIVE (Name and address - Include ZIP Code) ANDREW MORSS 111 KAREN DR IRWIN PENNSYLVANIA 15642			
20. MEMBER REQUESTS COPY 6 BE SENT TO (Specify state/locality) NV		OFFICE OF VETERANS AFFAIRS		X	YES
a. MEMBER REQUESTS COPY 3 BE SENT TO THE CENTRAL OFFICE OF THE DEPARTMENT OF VETERANS AFFAIRS (WASHINGTON, DC)				X	YES
21a. MEMBER SIGNATURE ESIGNED BY: MORSS ROBERT ABRAHAM 140 7032590	b. DATE (YYYYMMDD) 20151030	22a. OFFICIAL AUTHORIZED TO SIGN (Typed name, grade, title, signature) ESIGNED BY: MARCZAK WILLIAM THADDEUS JR. 1027772125 WILLIAM T MARCZAK JR., GS07, LEAD HRA		b. DATE (YYYYMMDD) 20151030	

SPECIAL ADDITIONAL INFORMATION (For use by authorized agencies only)		
23. TYPE OF SEPARATION RELEASE FROM ACTIVE DUTY		24. CHARACTER OF SERVICE (Include upgrades) HONORABLE
25. SEPARATION AUTHORITY AR 635-200, CHAP 4	26. SEPARATION CODE MBK	27. REENTRY CODE 1
28. NARRATIVE REASON FOR SEPARATION COMPLETION OF REQUIRED ACTIVE SERVICE		
29. DATES OF TIME LOST DURING THIS PERIOD (YYYYMMDD) NONE		30. MEMBER REQUESTS COPY 4 (Initials) RAM

Exhibit B

(Newspaper Article - Dec. 15, 2018)

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LOCAL

A CHANGE OF FIELD

Ex-military students transition from service to school

By Lily Forsyth
THE DAILY COLLEGIAN

Once students turn their tassels at high school graduation, many count the days left until college move-in.

Other students, however, are counting down the days until they don a military uniform and train to serve in the armed forces.

Two students, Robert Morris and Yianni Efthymiou, shared stories of their transitions from serving in the Army directly after high school to beginning their undergraduate studies at Penn State.

Finding his passion

A 17-year-old Robert Morris asked his proud yet terrified parents to sign the waiver that would allow him to enlist in the Army as a minor.

Growing up surrounded by family and friends who served in the military, Morris (junior secondary education) was aware of the pride and honor that stems from service.

He also didn't want — nor had the funds — to go to college.

"I wanted nothing to do with college at the time," Morris said. "I didn't want anything to do with school period."

Not wanting to be like typical Reno, Nevada, residents who "live there and die there," Morris met with an Army recruiter and began the process of joining the infantry division.

Later, Morris was offered a ranger contract with the Army and left home for the 2nd Ranger Battalion — stationed in Fort Lewis, Washington.

He was deployed three times in his four years of service.

Before he put on the uniform, though, Morris knew he wasn't looking for a lifelong military career.

"I knew I wanted a wife and kids," Morris said. "I kind of had an idea that I wanted to be a teacher, but I wasn't really there yet."

His experiences in uniform validated those thoughts.

"After getting in, I'm looking around at all these people that sold their souls to the military and I'm like, 'I don't want to be you,'" Morris said.

"I appreciate your service and I appreciate you because without you we wouldn't be as free as we are, but that wasn't my path."

During his first deployment, he realized becoming a high school history teacher would be the next step in his life journey.

"That sort of all hit me like a ton of bricks," Morris said. "I said 'When I get out, I'm going to go to college and getting my degree and being a high school history teacher.'"

During a recent assignment for his "English language learner" class, Morris drafted a letter in English and Spanish to send to the parents of his future students, explaining his teaching goals.

With enthusiasm in his eyes, Morris highlighted parts of his letter, which included plans for parent-student interactive homework and moments in which he would dress up in costume to help students learn.

He noted that he wants his future students to understand they aren't limited to only learning about history — they can make it, too.

As the son of two teachers, he wants to be a similar source of support like his parents are for him.

With the future in sight, Morris is ready for the next phase of his life.

"I'm pumped," Morris said through a giant smile. "I cannot wait [to be a teacher]."

A Cypriot soldier

On the other side of the world, Yianni Efthymiou graduated high school and went right into the army — the Cypriot army, that is.

"Coming out of high school and going into the army isn't as bad as you'd think because you're placed right into it and you have to adapt to what you're doing," Efthymiou said.

Born and raised in Cyprus, a country located in the Mediterranean, Efthymiou was automatically enlisted in the military for nine months of mandatory basic training as part of the country's conscription policy, which impacts all males aged 17 to 45.

Since one of his brothers served a reduced tour, Efthymiou was obligated to fulfill the entire nine months.

Though it took some adjustments and personal sacrifices, Efthymiou found a place in the army and continued his service as a second lieutenant for a total of two years.

One of the hardest things Efthymiou had to deal with was the loss of independence. "Being in the army, you literally give them everything," Efthymiou said. "They can do whatever they want and that's it. You have no choice."

Efthymiou's mother also battled cancer while he was enlisted, but he was able to visit his mother before two of her surgeries.

When Efthymiou decided he had gotten what he needed out of the army, he started to assess his options. Before leaving the military, Efthymiou opened a beach bar and later took a gap year to "decompress" and explore Europe.

Since coming to the United States for the first time to get an education, Efthymiou has had a "difficult" college experience so far.

"I get the classes and things like that, but getting back into... studying... has been very difficult," Efthymiou said. "In terms of social interactions, Efthymiou had some help due to the fact that he was housed in Alberton Hall, where he lived among upperclassmen."

As an older undergraduate student, it's getting harder... because I don't really bond with [underclassmen], especially the freshmen because the age gap is very different," Efthymiou said.

The 23-year-old also found it difficult to relate to some people in his high school class because they had the ability to go to college right after graduating. Efthymiou recalled one of his friends finishing her master's degree before he started his freshman year of college.

"It feels like you're being left behind and it sucks," he said.

Despite these feelings, Efthymiou is grateful for his post-high school years and "wouldn't give it up for anything."

"The army isn't for everyone and that's fine if that didn't work out for someone," Efthymiou said. "Don't feel like you have to [enlist]. There are other ways to be a hero or go to college."

Accepting helping hands

Efthymiou saw many young men come out of the army "traumatized" and wished people would understand the physical and mental strain the military puts on young adults.

"People struggle in the army," he said.

"The stress that comes from just being in there or not having control over what happens in that point of time... that's something that no one really talks about."

Though he left the army without any traumas, Efthymiou explained that exams and classes — though not as stressful as being in the army, he said — can be difficult to navigate.

"I just wish... people [were] more understanding of why... my grades fluctuate — where some days I'm really good and some days I'm really bad," he said.

"It's just because I'm still struggling to figure it out. It's like I have to start all over again."

Though he has not personally used many of the resources Penn State offers, Efthymiou recognizes the benefits of resources available in the Office of Veterans Programs. He also has a positive perspective about the ROTC program.

"I think the ROTC program teaches you really cool stuff," Efthymiou said. "I guess it prepares you for getting put into the front of it while you are getting an education, which I think is amazing."

Morris, on the other hand, has taken advantage of the resources of the Office of Veterans Programs and is currently completing a work-study there.

"Coming here, finding a job where there are other veterans who get it, it was cool to relate to some folks and some friends," Morris said.

Veterans Outreach Coordinator, Mary Fisk, understands how difficult the transition from military to academia can be, and uses her position in the Office of Veterans Programs to make the change as smooth as possible.

"[The transition] can be tough for some people," Fisk said. "Some people try to avoid it... but it's going to happen at some point and it's generally not going to be too comfortable."

The office, located in 325 Boucke Building, features certified counselors and a lounge for veterans to study or relax.

Programs available through the office include a mentor tutoring program, a veteran-only career fair and a veteran-specific orientation.

Fisk also worked with the education department to create a first-year seminar specifically for ex-military students that focuses on the transition.

Inspired by the book currently used in the class, Fisk is working with the Penn State University Press to create a Penn State edition, which will contain a collection of personal tales that future students will study. Art pieces of any format and genre will accompany the stories.

Fisk was also able to establish a veteran dormitory option, available in fall 2019, to help incoming students who don't know anyone find a place to live in their first year.

"We've had several veterans that come to school here, especially in the fall semester, who have gotten out of the military a week before they start classes," Fisk said. "It's nearly impossible to find affordable housing in State College at this time of year."

While these programs are available for veterans and military dependents, Fisk knows some veterans won't know exactly where to go to access the resources.

According to Fisk, it's "very comfortable" in the military. If those serving are having problems, individuals can seek out leadership and they'll take care of it.

Further, she noted people who are willing to help can't do everything for veterans.

To Morris, other on-campus can support veterans by just showing compassion.

"Everybody you pass by has their own wounds, their own scars that they're dealing with every day," Morris said. "Maybe you can use the fact that there's veterans walking among you as a reminder that there's some people that are shouldering a weight you can't even fathom."



Robert Morris (junior-secondary education) was deployed three times before coming to Penn State.

"Coming here, finding a job where there are other veterans who get it, it was cool to relate to some folks and some friends."

Robert Morris
Junior

Programs available through the office include a mentor tutoring program, a veteran-only career fair and a veteran-specific orientation.

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To email reporter: lmf5123@psu.edu. Follow her on Twitter at @lilyforsyth.



Collegian Creative

What is

Exhibit C

(Mural to Honor Veterans - July 29, 2020)

THE DAILY NEWS



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Your Hometown Newspaper



NFL:
Camps open
with eye on
baseball
Page 4

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WEDNESDAY, JULY 29, 2020

Mural to honor veterans

Petersburg Legion to unveil art during 100th anniversary

By JONATHAN
BERGMUELLER
Staff Writer

Don MacEachern held several ambitions for the Cloyd K. Davis American Legion Post 150 in Petersburg while he served as its commander from 2014-2018.

Over the course of his tenure, the Legion's new board of directors achieved many goals, which included paying off a mortgage, updating the bar, putting in a new heating system and other routine accomplishments.

But one goal that fell by the wayside was commissioning a mural to celebrate veterans along the back wall of the post's social room, where the organization has its meetings.

MacEachern said everywhere he turned, he could not find artists willing or able to do it. The Juniata Valley High School had several limitations involving liability and required the students working on it during school hours, which prevented it from being done. Professional artists agreed to paint the mural, but at a cost, which was not a condition the Legion was able to meet. The mural went by the wayside until last fall.

Shelley Ormsby, a 13-year United States Air Force veteran



Photo by JONATHAN BERGMUELLER

Penn State students Alyssa Lyons and put the finishing touches on a mural dedicated to veterans of the armed forces at the Cloyd K. Davis American Legion Post 150 social room in Petersburg. The mural will be unveiled during a 100th anniversary celebration Saturday, Aug. 1.

who served under Don while he was commander, works at Penn State University as an administrative professional. She visited a servicewoman's coffee hour and, on the off-hand, asked if anyone knew of someone willing to paint the mural. While no one expressed interest, a man stopped her before she left the gathering.

"I said ... I think I can get your mural done for you,"

the man, Robert Morris, said, recalling that meeting for *The Daily News*.

Morris, a U.S. Army veteran, assembled a team of volunteers that began sketching out the mural. From its inception, the team planned to represent 10 wars and conflicts on the wall: The American Revolutionary War, the War of 1812, the American Civil War, World War I,

World War II, the Korean War, the Vietnam War, the Persian Gulf War, Sept. 11, 2001, and the wars in Iraq and Afghanistan.

The team painted the mural throughout the past several months between other obligations on an entirely volunteer basis.

See Mural
Page 2

County receives hazard grant

By KYLIE HAWN
Staff Writer

The Huntingdon County Commissioners, during their weekly meeting Tuesday, approved a grant from the Federal Emergency Management Agency (FEMA) regarding the hazard mitigation grant that will be used to fully pay for the county's hazard mitigation plan update for 2020.

"This has been a two-year process," said Joe Thompson, the county's emergency management agency director. "It's taken a lot of hard work, not only from FEMA, but from FEMA, the planning department, EMA and commissioners, to complete."

The specific grant is from the 2020 fiscal year from the U.S. Department of Homeland Security for \$52,500 which will pay for the entire cost of updating the plan and hiring Michael Baker International, a consulting firm to help update the plan.

"We were able to find this funding source through a federal disaster declaration in 2018 due to severe storms across the state," said Thompson. "The federal share is \$40,000, and the state share is \$12,500, which covers the entire cost."

Commissioner Scott Walls added there are still a couple of municipalities that still need to turn in infor-

mation regarding the hazard mitigation plan update for the county before they submit it to FEMA for approval.

"Every municipality is required to have a plan, but the county is doing a county-wide plan, and we include all municipalities in this plan so they can adopt it," said Thompson. "This is so if funding becomes available (for disasters) or for insurance purposes, they can get money or residents can save on insurance."

Jim Lettiere, Huntingdon County Planning Director, also had this USDA Rural Housing Historic Preservation Grant agreement approved for \$71,718.23.

"This is countywide rehabilitation of homes," he said. "This was originally supposed to be used by September 2020, but this will be extended until September 2021. We want to work on about five homes for emergency rehabilitation, which includes an immediate need, like a health and safety threat, a home is without vital services or a sudden mechanical or structural failure."

Lettiere said they can get started immediately and help out those, mostly elderly, who have immediate needs. He also noted that Center for Community Action will

See Grant
Page 2

Mural

Continued from Page 1

In addition to Morss, one other volunteer is a veteran: Adam Paton. Sean Gallagher, Alyssa Lyons, Dovile Drozdovaite also helped. However, Morss attributed a lot of credit to Shae Rider, who specialized in depicting soldiers' faces on the mural.

"She's got most of the raw talent," Morss said. "I could focus her talent and she could just put something beautiful on the wall."

In addition to volunteering their time and talent, the group contributed its own supplies to paint the mural. Morss said Rider, especially, brought the bulk of paint and tools to paint the mural. The mural cost Legion members next to nothing, aside for the occasional refreshment provided for the painters. The element of service behind painting the mural acts as motivation for the end-product.

"I'm just blessed to be part of it," Morss said.

Morss' inspiration comes from the fact he feels a sense of heritage with America and the wars the team has depicted, him having been deployed to Afghanistan. He understands the sacrifices of those who often come to the Legion.

"My soul is bound to

that kind of patriotism and remembrance," Morss said. "This was a no-brainer for me."

However, Morss also wants to be a high school history teacher after he leaves school. He hopes the mural can be used to educate the next generation.

"If we can capture that within this mural, within 20 feet of historical content, hopefully a lot of people are going to walk away with the message, 'This all took place so that I can live in this country and be free and be a better person,'" Morss said.

"I think it's fantastic what they're doing," MacEachern said. "When I found out (Morss and Paton) are veterans, it makes it more special."

"He is just a ball full of energy," Ormsby said of Morss. "He is so passionate about this."

The mural will be unveiled at the Cloyd K. Davis American Legion Post 150 at 117 King St. in Petersburg. The unveiling ceremony, which will begin at noon, Saturday, Aug. 1, is open to the public. Immediately following the ceremony, the post will celebrate its 100-year anniversary since its founding, during which food and drinks will be provided to community guests.

Jon can be reached at jbergmueller@huntingdon-dailynews.com.

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Exhibit D

(Legion Mural a Testament to Service)
July 29, 2020



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FRIDAY

July 31, 2020

Legion mural a testament to service

Petersburg Post 150
to mark centennial
with weekend event

By Rick Boston

rboston@altoonamirror.com

PETERSBURG — An overheard conversation among a group of military women has led to the realization of a dream for the

Petersburg American Legion Post 150.

A 20-foot, 10-panel mural, with each panel representing the major wars the United States has fought since the Revolution, is set to be dedicated at a ceremony marking the post's centennial, beginning at noon Saturday.

Shelly Ormsby, post treasurer, said the legion has wanted to have a mural painted for some time.

"Between those panels is an evolution of warfare with different scenes that capture the heroic and patriotic moments of our nation's history."

Robert Morss, senior education major at PSU

"I asked around, but we couldn't make it happen," she said. Enter Robert Morss, a senior

education major at Penn State's University Park campus. In November, Morss was work-

ing in the Office of Veterans Programs on campus, and during a gathering of female veterans, he overheard Ormsby talk about trying to get a mural painted.

"I could hear what they were saying and at one point I heard someone mention that she was trying to get a mural painted but that nobody was able to do it," Morss said.

See Mural/Page A5

Friday, July 31, 2020

LOCAL

MURAL: To inspire next generation

(Continued from Page A1)

Morss said he went back to doing his homework and when the meeting was over, he approached Ormsby.

"I said, 'My name is Robert Morss and I think I can get that done for you,'" he said. "We have been working on it since then."

For Morss, 27, of Reno, Nevada, working on the mural is personal. A four-year veteran of the United States Army, Morss said it is a way for him to honor those who have come before him, while setting an example for those who will follow.

Morss said the mural begins with a scene of soldiers standing around a campfire at Valley Forge and ends with the present-day conflict in Afghanistan.

"Between those panels is an evolution of warfare with different scenes that capture the heroic and patriotic moments of our nation's history," he said.

Enlisting the help of some of his Penn State peers, Morss said the process of bringing the mural to life has been a humbling experience.

"It has been a beautiful thing to sketch it out and



Courtesy photo

Adam Paton (left) and Robert Morss work on the 10-panel war mural at the Petersburg American Legion Post 150. The mural, depicting scenes from every major war America has fought since the Revolution, will be unveiled to the public at noon Saturday.

watch it come to life as people have joined in," he said. "I am grateful for the support I have been getting throughout this journey."

Morss said the panels not only show America's battles, but also historical milestones in military evolution.

"It shows an African American soldier fighting alongside white soldiers

after the Military Integration Act, and the first female combatant, a pilot in the Gulf War.

Morss said the mural will stand as a testament to everyone who has served, and those who will one day serve.

"It's about honoring those who have come before us," he said. "It is also about the next generation that is com-

ing up. We have left plenty of room on the wall for more panels to be inserted. America is not done fighting wars to protect its people and its lands, and the next generation is going to have to do that. I want this mural to inspire them and challenge them."

Mirror Staff Writer Rick Boston is at 946-7535.

Exhibit E

(Veteran Unveil Mural-August 4, 2020)

Photos of Unveiling

DAILY NEWS

Your Hometown Newspaper



MLB:
Shorter double-headers may ease scheduling chaos, Page 4



TUESDAY, AUGUST 4, 2020

Veterans unveil mural

Petersburg Legion celebrates 100th anniversary

By REBECCA BERDAR
For The Daily News

The family of veterans and supportive patriots which has grown up around the Cloyd K. Davis American Legion Post 150 in Petersburg assembled Saturday to commemorate the post's centennial by unveiling a mural chronicling the battles and sacrifices that have shaped the nation and preserved its principals.

The 10-panel painting pays tribute to America's war veterans who served over the past 244 years, from the Revolutionary War to the battles in the Middle East.

The lead artist, Robert Morss, hails from Reno, Nevada, and served three tours in Afghanistan as an U.S. Army Ranger. He's now a Penn State University student, slated to graduate in the fall with degrees in secondary education, history and political science.

Morss recruited fellow Penn Staters to work on the mural, which was the brainchild of former Post 150 commander Don MacEachern. The crew initiated their project in November by sketching out the panels and started putting paint on the wall in January. The group, which trekked back and forth between State College and Petersburg for seven months, finalized the mural Friday morning just ahead of Saturday's celebration.

"It's been a honor falling in love with this Legion," Morss



Photo by REBECCA BERDAR

Mary Ann (Davis) Metz, niece of American Legion Post 150 namesake Cloyd K. Davis, unveiled the first section of a 10-panel mural which was dedicated Saturday during the post's 100th anniversary.

said. "For 100 years, this place has stood to be a safeguard for veterans, wandering souls and for those who need a place to call home."

Morss thanked Post 150's members and officers for their stewardship over the past century.

"I am proud of this place," he said. "I knew this was hallowed ground when I arrived ...

and it will stand for another 100 years."

Shelly Ormsby, Post 150 treasurer, served as emcee and introduced the community members who were selected to unveil each of the panels.

The first panel in the series, dedicated to the American Revolution, depicts a trio of Continental Army soldiers warming themselves around a campfire

in the dead of night, as Gen. George Washington sits astride a horse in the distance. The honor of unveiling this panel was given to Mary Ann (Davis) Metz, niece of Post 150's namesake Cloyd K. Davis.

The second panel honors the War of 1812 between the Unit-

See Mural
Page 3

THE DAILY NEWS, HUNTINGDON, PA

LOCAL NEWS

TUESDAY, AUGUST 4, 2020 3



Photo by Rebecca Borden

A hand-painted mural now stretches 10 panels across a wall in the meeting room of the Cloyd K. Davis American Legion Post in Petersburg and stands as a tribute to veterans from all American wars. The mural was the brainchild of former post commander Don MacEachern and was executed by a team of Penn State students.

Mural

Continued from Page 1

of States and England. Morris said the perspective is that of Francis Scott Key, author of the poem which would become the "Star-Spangled Banner." Key was held onboard a British ship during the Battle of Baltimore, Sept. 13-14, 1814. Key was inspired by his early morning view from the ship of the American flag still waving over Fort M'Henry following the nighttime bombardment.

Veteran Glen Metz, who Ormsby said hasn't missed a Post 150 Memorial Day observance in close to 50 years, unveiled the panel.

The third panel in the series, dedicated to the American Civil War, was unveiled by Bill Lightner whose great-grandfather Peter R. Rapert, served in the Union Army as an infantryman with Company C, 45th Regiment. The mural image shows a Union soldier embracing a dying Confederate soldier. Morris said the artistic team deliberately made the two men look similar to signify how the war pitted brother against brother.

The fourth panel honors those who fought during World War I and depicts a scene out of the trenches. The panel was unveiled by Regina Ormsby whose father, Charles M. Hoffman, was a sergeant in the U.S. Army during the Great War. He was

also a Purple Heart recipient and served at Post 150's first commander.

Shelly Ormsby explained Hoffman was shot in France and was nursed to health by a family on a nearby farm. She said he received a chest wound which might have proven fatal if not for a notebook he kept in his pocket which slowed the bullet.

Next, World War II veteran Lloyd Morningstar unveiled the mural's World War II panel which depicted an American pilot's cockpit view of the Japanese fleet at Midway. Morningstar, a Navy veteran, served in the Pacific Theater of Operations and participated in the assault and occupation of Okinawa Guto in June 1945.

The Korean War panel was unveiled by Post 150 historian Glen Butler. The panel shows Marines in position on the front lines as the sun rises over a snow-capped mountain in the distance.

The Vietnam War panel was unveiled by Don Butler, a veteran of that war. The panel shows soldiers on patrol through a lush jungle landscape.

Butler said the experience of warfare and its effects are difficult to grasp by those who haven't worn a uniform or who aren't close to someone who has.

"It's important for us to understand the enormity of the sacrifice," Butler said. "There are tens of thousands of Gold

Star families out there that can tell you the real cost of freedom."

Morris said the focus of the Vietnam War panel, an African American soldier, represents the realization of the Military Integration Act.

"While and Black fought side-by-side, spilling the same color of blood," Morris said.

Next, Scott Hearn, who served in the U.S. Army for 21 years, from June 1982 to November 2003, unveiled the eighth panel, dedicated to the first Gulf War. Morris shared that the panel honors female combatants by depicting a woman pilot, and also the support personnel working behind the scenes.

The ninth panel portrays the immediate aftermath of the Sept. 11, 2001, terrorist attacks, with smoke billowing from twin towers of the World Trade Center in New York City.

For this panel, the artists incorporated the Coast Guard ship Juniper which rendered aid in the New York City area following the attack. Onboard that ship was Shelly Ormsby's husband, Brett, who had the honor of unveiling the panel.

Morris said the panel is titled "The Day the World Stood Still" and shared how he, as a third grade student, watched the second plane hit the WTC live on television. The attacks led to the second Gulf War and subsequent conflict in Afghanistan which Morris himself would join as a member of the

U.S. Army right out of high school.

Morris himself unveiled the final panel which honors veterans of the wars in Iraq and Afghanistan. Morris dedicated the panel to his fellow Rangers, in particular Sgt. Thomas McPherson, killed in action at age 26 during heavy firefight in Ghazni Province Oct. 12, 2012.

"There are a lot of Easter eggs hidden in these panels," Morris said, encouraging the audience to take a closer look.

For example, the constellation seen overhead in the night sky of the first panel, is the same one in the sky in the last panel. Each panel also shows the evolution of arms, from the muskets of the Revolution, to the state-of-the-art weaponry with which today's combatants are equipped.

Morris pointed out that each panel shows someone holding or carrying a book. He said the book is open to interpretation and could be a Bible to represent someone's faith or a manual of rules and regulations which speaks to task and purpose as a member of the armed services.

Morris presented two challenges to the roughly 80 persons in attendance. Speaking as a future history teacher, Morris's first challenge the audience to do their part in educating upcoming generations about the nation's history and the many and varied sacrifices made by veterans to ensure the nation's preservation.

"Second, I challenge you to live a life worthy of their sacrifice," Morris said.

Other members of the artistic team were Air Force veterans Adam Paton and Sean Gallagher, plus Shae Rider, Dorelle Drosadevita and Alyssa Lyons.

"For me, it was a good opportunity to put myself into the painting," Paton said, adding he wanted his panel, the one dedicated to the Gulf War, to serve as a shout-out to support personnel like himself.

Following the presentation of the mural, the Post 150 family continued to honor the post's history with a social featuring live music, home-cooked food and plenty of fellowship.

The post's namesake, Cloyd K. Davis, was killed in action Oct. 4, 1918, at Mont Blanc, France. Davis was 23 years old.

Born Dec. 30, 1893, in the Shavers Creek Valley, the son of Elmer and Ella (Kocher) Davis and brother of Ernest and Earl Davis. He grew up on the family farm in West Township and attended Petersburg schools, graduating in 1914. According to a Dec. 2, 1918, report in the Altoona Times, Davis graduated from Juniata College in 1917 and enlisted with the U.S. Marine Corps June 29, 1917, in Altoona.

He saw his family for the last time during a three-day leave prior to shipping out for France Sept. 22, 1918.

On Oct. 4, 1918, Cloyd and his company were positioned in a skirmish line against the Ger-

mans at Mont Blanc (description). The company was pinned down for about four hours by the Germans on this barren stretch of land with only scattered woods for cover, when they were attacked by a German aircraft which strafed the Americans with machine gun fire. At this moment, Davis paid the supreme sacrifice for his country.

Davis was initially buried in the Meuse-Argonne Cemetery in France, then reinterred close to home in the Mooreville Cemetery in West Township in 1921.

The Cloyd K. Davis Post 150 was chartered Aug. 1, 1920, less than one year after Congress chartered the American Legion organization. Post 150 held its first meetings in the homes of its officers and directors, then settled into the Odd Fellows Hall above the old U.S. Post Office. Meetings were suspended from 1941 through 1945 while American was again at war. Post 150 resumed its activities in 1946.

Post 150 relocated several times, occupying the second floor of Anderson Home and Supply in Petersburg and Eva Kirkpatrick's store room, before building a home all its own. Post 150 purchased two and one-half lots on King Street in Petersburg in 1961 and started renovating the property July 17 of that year. Post 150 has remained at this location ever since.

Rebecca can be reached at dnews@huntingdondailynews.com.

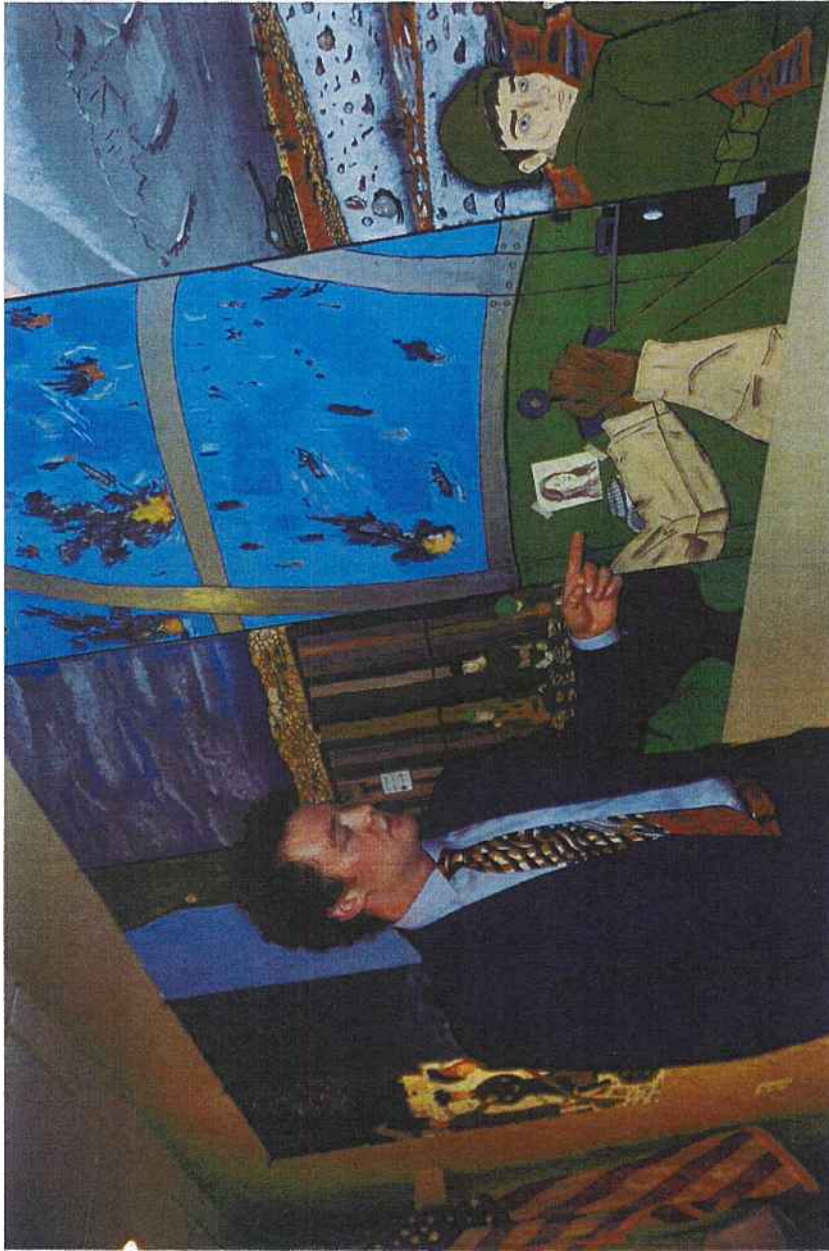






Exhibit F

(Letters from Penn State University)



Office of Curriculum and Instruction Field Experiences
College of Education
The Pennsylvania State University
170 Chambers Building
University Park, PA 16802-3205

Phone: 814-863-1734
Fax: 814-861-1927
www.ed.psu.edu/efile

Timothy D. Larouere
2156 Robin Hood Drive
N. Huntingdon, PA 15642

December 11, 2020

To Whom It May Concern:

I am pleased to write a letter of recommendation for Mr. Robert Morss. Mr. Morss completed his student teaching experience in Secondary Social Studies under my supervision during the fall semester of 2020 at Shaler Middle School in the Shaler Area School District.

Mr. Morss was an exemplary student. He was very professional in his duties as a student teacher and strove to meet the needs of all of his students regardless of their ability level. He had a wonderful classroom presence and developed a great rapport with his students, all of which translated into his creating a positive environment that was conducive to learning. One of his greatest attributes was his ability to prepare and plan. Robert planned very creative activities to support student learning. He consistently incorporated a variety of technological strategies into his daily lessons. Communication was a strong point for him. He effectively used verbal, nonverbal, and media communications to enhance his lessons.

Robert exhibited true professionalism. He met regularly with his mentor and other eighth grade team members to discuss teaching techniques and strategies. Robert would frequently infuse relevant community and school characteristics into his lessons. He reflected well on lessons taught, and always tried to improve himself as an educator.

Mr. Morss has achieved exemplary ratings and evaluations. He is very motivated and maintains a high level of professionalism. Robert will be an outstanding teacher, and I recommend him to you without hesitation. If I can be of further assistance, please do not hesitate to contact me at 724-863-0134 or tdl12@psu.edu.

Sincerely,

A handwritten signature in cursive script that reads "Timothy D. Larouere".

Timothy D. Larouere
Supervisor of Student Teachers
Penn State University



PennState

Eric J. Barron
President

The Pennsylvania State University
201 Old Main
University Park, PA 16802

Dear Penn Stater:

On Saturday, December 19, 2020, for the 396th time, we will celebrate the accomplishments of the men and women who have completed their academic programs at Penn State. As a result of the COVID-19 pandemic and public health guidance to limit large gatherings and maintain social distancing, we will be celebrating with a virtual ceremony. The Class of 2020 has experienced a period that will change our nation and our world. You have demonstrated an inspiring level of creativity, strength, resilience and maturity—all skills that will contribute to the betterment of humankind. You are to be commended for your good works and goodwill as you adjusted to profound changes over the past several months.

On behalf of Penn State, I want you to know how much we will miss sharing our fall commencement in person with you and your families. However, we're pleased that we can still acknowledge this important milestone through a special ceremony that will be streamed online at <https://fall2020 commencement.psu.edu/> on Dec. 19 at 2 p.m. EST.

Although this is a departure from the traditional ceremony that dates back nearly 1,000 years, no commencement is complete without one ancient symbol of our medieval past: the mortarboard and tassel. We hope that for the virtual ceremony on December 19, you will wear the enclosed mortarboard as nearly 900,000 Penn State alumni have in the past, so that you may move your tassel from right to left when your degree is conferred.

Commencement is a joyous time, and as college graduates, you will be joining an elite group of individuals: only 39% of Americans over the age of 25 have earned a bachelor's degree. For about one-third of our Penn State families, this will be the first time a family member has earned a college degree. We are incredibly proud of each of you and urge you to be part of our livestreamed University-wide commencement.

I hope you feel a sense of accomplishment—not only for your own personal successes, but for all you have contributed to the larger community. To the Class of 2020, I offer my heartfelt congratulations. You are an important part of the Penn State family. I hope you'll join us online on December 19, 2020, and we'll look forward to seeing you back on campus when we can safely celebrate your accomplishments together.

Sincerely,

Eric J. Barron
President, Penn State

Exhibit G

Letter of Recommendation from
Shaler Area Middle School, Glenshaw, PA

Shaler Area Middle School

1810 Mt. Royal Boulevard, Glenshaw, PA 15116 • 412.492.1200 • www.sasd.k12.pa.us

Eric Stennett, Ed.D.
Principal



Shannon M. Howard, Ed.D.
Assistant Principal

December 2, 2020

To Whom It May Concern:

It is with great pleasure that I write this letter of recommendation regarding the professional competencies and personal attributes of Mr. Robert Morss. As Robert's supervisory teacher, during his student teaching experience, I observed and mentored him throughout the fall semester of the 2020-2021 school year.

Mr. Morss exhibits poise and confidence in the classroom. He was outstanding in the areas of class preparation, lesson pacing, attending to student learning needs, varying teaching methods to reach all learners and classroom management. Mr. Morss's computer and technological knowledge proved to be an enormous asset to my classes as 2020-2021 school year has been year of many challenges. Robert has helped our department design and implement a hybrid and remote curriculum to facilitate the needs of students and families as we navigate the pandemic. His knowledge of Apple products and their applications as well as his mastery of Microsoft products and their use as a tool in the classroom has been a tremendous asset during this challenging and evolving time for education. Robert has also taken part in planning and implementing of our departments Historical Thinking and Social Studies C3 Framework lessons. Robert's content knowledge has also been an asset when helping to plan and implement Pennsylvania's Core Standards lessons and navigating through the pandemic.

During his time in my class, he has made remarkable progress in the critical areas of classroom management and lesson design. What makes his progress stand out is that he has taught students of all levels. These classes consist of gifted students as well as students with special needs and learning disabilities. The class sizes varied from 18 to 30 students. He worked with each group and made the necessary adaptations and accommodations to ensure the success of each individual learner. Mr. Morss's desire to go above and beyond his classroom duties is demonstrated by his willingness to design lessons highlighting his own military experience for a 9/11 lesson and dressing as Robert Morris and recording an interview for the students to gain an understanding of the sacrifices made during the Revolutionary period. His competence, dedication, and professionalism are unquestionable. Robert's positive attitude and dedication to his career has been an incredible asset to my classroom during his experience.

Without reservation, I urge you to consider Mr. Robert Morss for a teaching position in your school district. He is sure to become a positive attribute to your district and the teaching profession.

Sincerely,

Thomas J. Gray
Activities Director
Social Studies Department Chair
Social Studies Teacher
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Exhibit H

(Family Photos)

