

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

FGJ 07-103(WPB)

IN RE:

GRAND JURY PROCEEDINGS
_____ /

SEALED MOTION

The United States of America, by and through the undersigned Assistant United States Attorney, hereby moves the Court for permission to disclose the Court's Sealed Order of April 16, 2007 and a grand jury subpoena related to that sealed order. In support thereof, the Government states:

1. In April 2007, the United States filed a Sealed Motion for an Order compelling the testimony of [REDACTED].

2. On April 16, 2007, the Court granted the Sealed Motion in a Sealed Order, which is attached hereto.

3. The matter relates to issues occurring before the grand jury and, accordingly, is governed by Fed. R. Crim. P. 6(e). Under that Rule, the "court may authorize disclosure – at a time, in a manner, and subject to any other conditions that it directs – of a grand-jury matter: (i) preliminarily to or in connection with a judicial proceeding."

4. The Order itself

5. The Sealed Order and subpoena are relevant to a judicial proceeding, that is, *Jane Doe 1 and Jane Doe 2 v. United States*, 08-80736-CV-MARRA. [REDACTED] is one of the Petitioners in that case, and she has alleged, *inter alia*, that she was not treated fairly in connection with the investigation of Jeffrey Epstein.

6. The United States respectfully requests permission to disclose redacted versions of the subpoena and Order.

in the pub this Motion, the United States' Surreply to the Replies of William Riley and Intervenor Jeffrey Epstein on Motion to Quash Grand Jury Subpoenas, and Supplement to Ex Parte Declaration Number One in Support of United States' Response to Motion to Quash Subpoenas, for the following reasons:

1. The attached documents contain information relating to an ongoing grand jury investigation; thus, pursuant to Fed. R. Crim. P. 6(e)(6), all records and orders related to the grand-jury proceedings must be kept under seal to the extent and as long as necessary to prevent the unauthorized disclosure of a matter occurring before the grand jury.

2. Public disclosure of this matter would jeopardize the criminal investigation, notify potential subjects and/or targets and undermine the public interest and the function of the grand jury.

WHEREFORE, the United States respectfully requests that the aforementioned documents be sealed.

Respectfully submitted,

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UNITED STATES ATTORNEY

By:

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August ____, 2007, the foregoing document was served via Federal Express on Attorneys William Richey and Roy Black. This document was not filed using CM/ECF because it is being filed under seal.

[REDACTED]
Assistant U.S. Attorney

SERVICE LIST
In re Federal Grand Jury Subpoenas No. OLY-63 and OLY-64
United States District Court, Southern District of Florida

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