

IN THE CIRCUIT COURT OF THE  
SEVENTEENTH JUDICIAL CIRCUIT  
IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO.: CACE 15-000072

BRADLEY J. EDWARDS and  
PAUL G. CASSELL,

Plaintiffs/Counterclaim Defendants,

vs.

ALAN M. DERSHOWITZ,

Defendant/Counterclaim Plaintiff.

\_\_\_\_\_/

**DEFENDANT/COUNTERCLAIM PLAINTIFF ALAN DERSHOWITZ'S  
MOTION FOR CLARIFICATION OF CONFIDENTIALITY ORDER OR RELIEF  
FROM THAT ORDER**

The transcript of the deposition of non-party [REDACTED] is currently under seal as a result of the January 12, 2016 Confidentiality Order in this action. Dershowitz seeks clarification that the Confidentiality Order does not preclude him or his counsel from submitting the transcript of the deposition to the Office of the State Attorney, the Office of the United States Attorney, and other appropriate investigative authorities solely for purposes of requesting that those offices consider opening perjury investigations regarding [REDACTED] testimony. To the extent that the Confidentiality Order precludes such disclosure, Dershowitz requests that the Court modify it to permit the requested disclosure in the public interest.

[REDACTED] has stated in an affidavit originally filed publicly in federal court in what the parties have referred to as the CVRA Action that she was present on Jeffrey Epstein's private island, Little St. James Island, at the same time as former President Clinton. That affidavit was

stricken in relevant part from the record by the federal court, but [REDACTED] counsel filed publicly a pleading in this case contesting Defendant's assertion that her statements in the media regarding meeting former President Clinton were untrue. A copy of the public affidavit filed in the CVRA Action and the excerpted portion of the pleading filed in this action are attached hereto as composite Exhibit A.

Because former President Clinton did not leave office until January of 2001, and [REDACTED] has repeatedly stated in publicly filed affidavits that she "escaped" from Epstein while in Thailand in September of 2002, the alleged meeting with former President Clinton must have taken place between January of 2001 and September of 2002. As explained in the letter attached as Exhibit B, former FBI Director Louis Freeh made a request pursuant to the Freedom of Information Act for documents from the Secret Service regarding Secret Service personnel travelling with former President Clinton to Epstein's private island and the US Virgin Islands. Based on the response by the federal government to this request, and his knowledge of the duties, protocols and operations of security provided to a former President, Mr. Freeh opines in the attached letter that the absence of such records "strongly establishes that former President Clinton was not present on Little St. James Island during the period at issue." If Mr. Freeh's opinion is correct, then [REDACTED] publicly filed affidavits in which she stated that she met President Clinton on the island during that period are obviously false. Dershowitz intends to bring this public information to the attention of the appropriate authorities.

Separate from the public information, Dershowitz also believes that [REDACTED] gave false testimony at her deposition. The relevant testimony, which Dershowitz intends to provide to the appropriate authorities, is being filed under seal contemporaneously with this motion. In an abundance of caution, Dershowitz and his counsel do not want to disclose this non-public

information even to the responsible public officials with a right and need to know without obtaining confirmation from this Court that doing so would not violate the Confidentiality Order or alternatively relief from that Confidentiality Order.

Respectfully submitted,

s/ Thomas E. Scott

Thomas E. Scott

Florida Bar No. 149100

[REDACTED]

Steven R. Safra

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[REDACTED]

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[REDACTED]

*Counsel for Alan M. Dershowitz*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been electronically filed through the Clerk of Broward County by using the Florida Courts eFiling Portal and thus served by electronic mail: [REDACTED] to: Jack Scarola, Esq, Searcy Denney Scarola Barnhart & Shipley, P.A., Counsel for Plaintiff, 2139 Palm Beach Lakes Blvd., West Palm Beach, Florida 33409; [REDACTED] to: Joni J. Jones, Esq., Assistant Utah Attorney General, Counsel for Plaintiff Cassell, 160 East 300 South, Salt Lake City, Utah 84114; [REDACTED] to: Bradley J. Edwards, Esq, Farmer, Jaffe et al, 425 North Andrews Avenue, Suite 2, Ft. Lauderdale, FL 33301; c [REDACTED] b: Paul G. Cassell, Esq.,; [REDACTED] Sigrid S. McCawley, Esq., Boies Schiller & Flexner, LLP, 401 E. Las Olas Blvd, Suite 1200, Ft. Lauderdale, FL 33301, this 29<sup>th</sup> day of January, 2016.

By: *s/ Thomas E. Scott*  
THOMAS E. SCOTT  
FBN: 149100  
STEVEN R. SAFRA  
FBN: 057028

# EXHIBIT A

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

**CASE NO. 08-80736-CIV-MARRA**

JANE DOE #1 and JANE DOE #2,  
Petitioners,

vs.

UNITED STATES OF AMERICA,  
Respondent.

\_\_\_\_\_ /

**DECLARATION OF [REDACTED]**

1. My name is [REDACTED] and I was born in August, 1983.
2. I am currently 31 years old.
3. I grew up in Palm Beach, Florida. When I was little, I loved animals and wanted to be a veterinarian. But my life took a very different turn when adults began to be interested in having sex with me.
4. In approximately 1999, when I was 15 years old, I met Ghislaine Maxwell. She is the daughter of Robert Maxwell, who had been a wealthy publisher in Britain. Maxwell asked that I come with her to Jeffrey Epstein's mansion for the purposes of teaching me how to perform "massages" and to train me professionally in that area. Soon after that I went to Epstein's home in Palm Beach on El Brillo Way.
5. From the first time I was taken to Epstein's mansion that day, his motivations and actions were sexual, as were Maxwell's. My father was not allowed inside. I was brought up some stairs. There was a naked guy, Epstein, on the table in the room. Epstein and Maxwell forced me into sexual activity with Epstein. I was 15 years old at the time. He seemed to be in his 40s or 50s. I was paid \$200. I was driven home by one of Epstein's employees.

6. I came back for several days following and did the same sorts of sexual things for Epstein.

7. After I did those things for Epstein, he and Maxwell said they were going to have me travel and were going to get an education for me. They were promising me the world, that I would travel with Epstein on his private jet and have a well-paid profession. Epstein said he would eventually match me up with a wealthy person so that I would be “set up” for life.

8. So I started “working” exclusively for Epstein. He took me to New York on his big, private jet. We went to his mansion in New York City. I was shown to my room, a very luxurious room. The mansion was huge. I got scared because it was so big. Epstein brought me to a room with a massage parlor. To me, it looked like an S&M parlor. Epstein made me engage in sexual activities with him there.

9. You can see how young I looked in the photograph below.



10. Epstein took me on a ferry boat on one of the trips to New York City and there he took the picture above. I was approximately 15 or 16 years old at the time.

11. Over the next few weeks, Jeffrey Epstein and Ghislaine Maxwell trained me to do what they wanted, including sexual activities and the use of sexual toys. The training was in New York and Florida, at Epstein's mansions. It was basically every day and was like going to school. I also had to have sex with Epstein many times.

12. I was trained to be "everything a man wanted me to be." It wasn't just sexual training - they wanted me to be able to cater to all the needs of the men they were going to send me to. They said that they loved that I was very compliant and knew how to keep my mouth shut.

13. Epstein and Maxwell also told me that they wanted me to produce things for them in addition to performing sex on the men. They told to me to pay attention to the details about what the men wanted, so I could report back to them.

14. From very early on I was fearful of Epstein. Epstein told me he was a billionaire. I told my mother that I was working for this rich guy, and she said "go, go far away." Epstein had promised me a lot, and I knew if I left I would be in big trouble. I also knew that I was a witness to a lot of illegal and very bad behavior by Epstein and his friends. If I left Epstein, he knew all kinds of powerful people. He could have had me killed or abducted, and I always knew he was capable of that if I did not obey him. He let me know that he knew many people in high places. Speaking about himself, he said "I can get away" with things. I was very scared, particularly since I was a teenager.

15. I visited and traveled with Jeffrey Epstein from 1999 through the summer of 2002, and during that time I stayed with him, as his sex slave, at each of his houses (really more like mansions) in locations including New York City, New York; the area of Santa Fe, New Mexico; Palm Beach, Florida; an island in the U.S. Virgin Islands; and Paris, France. I had sex with him often in these places and also with the various people he demanded that I have sex with. Epstein paid me for many of these sexual encounters. In fact, my only purpose for Epstein, Maxwell and their friends was to be used for sex.

16. To illustrate my connection to these places, I include four photographs taken of me in New Mexico (shown below). The first one is a museum in Santa Fe, New Mexico. We had gone sightseeing for the day. Epstein took this picture of me. I was approximately 17 at the time, judging from the looks of it. At the end of the day we returned to Epstein's Zorro Ranch. The second picture is me on one of Epstein's horses on the ranch in New Mexico. The following two are from wintertime in New Mexico.





17. When I was with him, Epstein had sex with underage girls on a daily basis. His interest in this kind of sex was obvious to the people around him. The activities were so obvious

and bold that anyone spending any significant time at one of Epstein's residences would have clearly been aware of what was going on.

18. Epstein's code word for sexual encounters was that it was a "massage". At times the interaction between Epstein and the girls would start in a massage room setting, it was always a sexual encounter and never just a massage.

19. In addition to constantly finding underage girls to satisfy their personal desires, Epstein and Maxwell also got girls for Epstein's friends and acquaintances. Epstein specifically told me that the reason for him doing this was so that they would "owe him," they would "be in his pocket," and he would "have something on them." I understood him to mean that when someone was in his pocket, they owed him favors. I also understood that Epstein thought he could get leniency if he was ever caught doing anything illegal, or more so that he could escape trouble altogether.

20. Ghislaine Maxwell was heavily involved in the illegal sex. I understood her to be a very powerful person. She used Epstein's money and he used her name and connections to gain power and prestige.

21. One way to describe Maxwell's role was as the "madame." She assumed a position of trust for all the girls, including me. She got me to trust her and Epstein. It turned out that Maxwell was all about sex all the time. She had sex with underage girls virtually every day when I was around her, and she was very forceful.

22. I first had sexual activities with her when I was approximately 15 at the Palm Beach mansion. I had many sexual activities with her over the next several years in Epstein's various residences plus other exotic locations. I had sex with Maxwell in the Virgin Islands,

New Mexico, New York, as well as France and many other locations. I also observed Maxwell have sex with dozens of underage girls.

23. Maxwell took pictures of many of the underage girls. These pictures were sexually explicit. Maxwell kept the pictures on the computers in the various houses. She also made hard copies of these images and displayed them in the various houses. Maxwell had large amounts of child pornography that she personally made. Many times she made me sleep with other girls, some of whom were very young, for purposes of taking sexual pictures.

24. Harvard law professor Alan Dershowitz was around Epstein frequently. Dershowitz was so comfortable with the sex that was going on that he would even come and chat with Epstein while I was giving oral sex to Epstein.

25. I had sexual intercourse with Dershowitz at least six times. The first time was when I was about 16, early on in my servitude to Epstein, and it continued until I was 19.

26. The first time we had sex took place in New York in Epstein's home. It was in Epstein's room (not the massage room). I was approximately 16 years old at the time. I called Dershowitz "Alan." I knew he was a famous professor.

27. The second time that I had sex with Dershowitz was at Epstein's house in Palm Beach. During this encounter, Dershowitz instructed me to both perform oral sex and have sexual intercourse.

28. I also had sex with Dershowitz at Epstein's Zorro Ranch in New Mexico in the massage room off of the indoor pool area, which was still being painted.

29. We also had sex at Little Saint James Island in the U.S. Virgin Islands. I was asked to give Dershowitz a massage on the beach. Dershowitz then asked me to take him somewhere more private, where we proceeded to have intercourse.

30. Another sexual encounter between me and Dershowitz happened on Epstein's airplane. Another girl was present on the plane with us.

31. I have recently seen a former Harvard law professor identified as Alan Dershowitz on television calling me a "liar." He is lying by denying that he had sex with me. That man is the same man that I had sex with at least six times.

32. Epstein made me have sex with Prince Andrew several times. Prince Andrew, Maxwell, and I are shown in the photograph below. I had sex with him three times, including one orgy. I knew he was a member of the British Royal Family, but I just called him "Andy."



33. One day when I was in London (specifically in a townhouse that is under Maxwell's name), I got news from Maxwell that I would be meeting a prince. Later that day, Epstein told me I was meeting a "major prince." Epstein told me "to exceed" everything I had been taught. He emphasized that whatever Prince Andrew wanted, I was to make sure he got.

34. Eventually Prince Andrew arrived, along with his security guards. The guards then went out of the house and stayed out front in their car. It was just Epstein, Maxwell, and me inside alone with Andy. I was introduced to the Prince, and we kissed formally, cheek to cheek.

There was a lot of legal discussion about Andy and his ex-wife (“Fergie”). Then the discussion turned to me. Maxwell said “guess how old she is.” Prince Andrew guessed 17.

35. Then we all went to a Chinese restaurant for dinner and then to Club Tramp, a fancy “members only” night club in central London. Andy arranged for alcohol to be provided to me at the club. Eventually we left. I rode with Epstein and Maxwell back to the townhouse. On the way there, Epstein and Maxwell informed me that the Prince wanted to see “more of me” that night. Andy traveled in a separate car with his guards.

36. We all arrived back at the townhome and went upstairs. Epstein took a picture of me and Andy with my own camera. The picture above is that picture, which has been widely circulated on the internet. Andy has his left arm around my waist and is smiling. The picture was developed on March 13, 2001, and was taken sometime shortly before I had it developed. I was 17 years old at the time.

37. I wanted a picture with the prince because I was keeping in contact with my family. I had told my mom and my grandma that I was meeting Prince Andrew and that I’d take a picture for them. They told me to “be careful.”

38. After the picture, Epstein and Maxwell kissed me and said to “have fun.” They left Andy and me alone upstairs. We went to the bathroom and bedroom, which were just steps away from where the picture was taken. We engaged in sexual activities there. Afterwards, Andy left quickly with his security.

39. I chatted with Epstein about this the next day. I told him, “it went great.” Epstein said something to the effect of, “You did well. The Prince had fun.” I felt like I was being graded. It was horrible to have to recount all these events and have to try to meet all these needs

and wants. I told Epstein about Andy's sexual interests in feet. Epstein thought it was very funny. Epstein appeared to be collecting private information about Andy.

40. When I got back from my trip, Epstein paid me more than he had paid me to be with anyone else – approximately \$15,000. That money was for what I had done and to keep my mouth shut about “working” with the Prince.

41. The second time I had sex with Prince Andrew was in Epstein's New York mansion in spring 2001. I was 17 at time. Epstein called me down to his office. When I got there, Epstein was there, along with Maxwell, [REDACTED], and Andy. I was very surprised to see him again. Epstein and Maxwell were making lewd jokes about “Randy Andy”.

42. I had the impression that Andy had come there to see Epstein and to have sex me with. There was no other apparent purpose for Andy to be there.

43. I was told to go upstairs with Andy and to go to the room I thought of as the “dungeon” (the massage room, but it is really scary looking). I had sex with Andy there. I was only paid \$400 from Epstein for servicing Andy that time.

44. The third time I had sex with Andy was in an orgy on Epstein's private island in the U.S. Virgin Islands. I was around 18 at the time. Epstein, Andy, approximately eight other young girls, and I had sex together. The other girls all seemed and appeared to be under the age of 18 and didn't really speak English. Epstein laughed about the fact they couldn't really communicate, saying that they are the “easiest” girls to get along with. My assumption was that Jean Luc Brunel got the girls from Eastern Europe (as he procured many young foreign girls for Epstein). They were young and European looking and sounding.

45. Afterwards we all had dinner by the cabanas. The other girls were chatting away among themselves, and Epstein and the Prince chatted together. I felt disgusted, and went

quickly to my own cabana that night and went to sleep. Prince Andrew must have flown out early the next morning, as I did not see him when I got up.

46. I have seen Buckingham Palace's recent "emphatic" denial that Prince Andrew had sexual contact with me. That denial is false and hurtful to me. I did have sexual contact with him as I have described here – under oath. Given what he knows and has seen, I was hoping that he would simply voluntarily tell the truth about everything. I hope my attorneys can interview Prince Andrew under oath about the contacts and that he will tell the truth.

47. I also had sexual intercourse with Jean Luc Brunel many times when I was 16 through 19 years old. He was another of Epstein's powerful friends who had many contacts with young girls throughout the world. In fact, his only similarity with Epstein and the only link to their friendship appeared to be that Brunel could get dozens of underage girls and feed Epstein's (and Maxwell's) strong appetite for sex with minors.

48. Brunel ran some kind of modeling agency and appeared to have an arrangement with the U.S. Government where he could get passports or other travel documents for young girls. He would then bring these young girls (girls ranging in age from 12 to 24) to the United States for sexual purposes and farm them out to his friends, including Epstein.

49. Brunel would offer the girls "modeling" jobs. A lot of the girls came from poor countries or poor backgrounds, and he lured them in with a promise of making good money.

50. I had to have sex with Brunel at Little St. James (orgies), Palm Beach, New York City, New Mexico, Paris, the south of France, and California. He did not care about conversation, just sex.

51. Jeffrey Epstein has told me that he has slept with over 1,000 of Brunel's girls, and everything that I have seen confirms this claim. Epstein, Brunel, and Maxwell loved orgies with

kids – that is, having sexual interactions with many young teenagers at the same time. Sometimes as many as ten underage girls would participate in a single orgy with them. I personally observed dozens of these orgies. The orgies happened on Epstein's island in the U.S. Virgin Islands, in New Mexico, Palm Beach, and many other places. Most of the girls did not speak English. It was my understanding that the girls had been persuaded to come by Brunel offering them illegal drugs or a career in modeling. Brunel was one of the main procurers of girls.

52. In addition to Ghislaine Maxwell, [REDACTED] and [REDACTED] were also involved in the orgies. At this stage, I am hopeful that these other women will come forward and tell the truth about everything because that will help prevent future similar abuse.

53. I have seen reports saying or implying that I had sex with former President Bill Clinton on Little Saint James Island. Former President Bill Clinton was present on the Island at a time when I was also present on the Island, but I have never had sexual relations with Clinton, nor have I ever claimed to have had such relations. I have never seen him have sexual relations with anyone.

54. I now understand that Epstein reached a non-prosecution agreement with the federal government in 2007 and pled guilty to two state crimes in June 2008. I now know that I was identified by the federal government as one of Epstein's and his co-conspirator's sexually abused victims. However, no one told me about those events until after they happened.

55. On September 3, 2008, the FBI sent a victim notification letter to me. This was the first written communication I had received from the FBI. The letter is attached as Exhibit 1. The letter describes an agreement in which compensation would be made victims of Epstein's

sexual abuse. The letter also said that the federal government was going to “defer federal prosecution.” No one had told me about deferring federal prosecution before this.

56. In 2011, two FBI agents, called me in Australia and then came to meet me. They met me at the U.S. Consulate in Sidney. They seemed to be very professional and hard working. I thought to myself, “Wow, these people will do the right thing against the bad guys and protect me.”

57. The agents were mainly focused on Epstein but while there I provided them some information about others who were involved in illegal acts as well. I was aware that a false statement to these law enforcement officers was a crime and I told the truth – giving them the information that I could recall about the individuals they inquired about.

58. Epstein also trafficked me for sexual purposes to many other powerful men, including politicians and powerful business executives. Epstein required me to describe the sexual events that I had with these men presumably so that he could potentially blackmail them. I am still very fearful of these men today.

59. I will continue to cooperate fully in the investigation and prosecution of Epstein, Maxwell, or any of their friends who participated in the sexual abuse of minors. I also hope that this information is treated in a way that will keep me safe from Epstein and others criminals identified here so as to encourage more victims of similar crimes to come forward. If these crimes are not prosecuted, despite my volunteering this information and cooperation, then it may deter other similar victims from coming forward.

60. In this affidavit, I have tried to focus on how I was trafficked for sexual purposes. I have not described all of the details of the sexual activities Epstein forced me to have. Also, I have not described all of the details of the other events discussed here. If a judge wants me to

present my information in more detail, including more specific descriptions of the sexual activities with the men Epstein sent me to, I could do so.

61. I have directed my attorneys, Bradley J. Edwards and Paul G. Cassell, to pursue all reasonable and legitimate means to have criminal charges brought against these powerful people for the crimes they have committed against me and other girls. They are representing me in this case pro bono.

62. Since I filed my motion in this case, my credibility has been attacked. I am telling the truth and will not let these attacks prevent me from exposing the truth of how I was trafficked for sex to many powerful people. These powerful people seem to think that they don't have to follow the same rules as everyone else. That is wrong. I hope that by coming forward, I can help expose the problem of sex trafficking and prevent the same sort of abuse and degradation that happened to me from happening to other girls.

63. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 9<sup>th</sup> day of January, 2015.

(Location of signature left undisclosed for security reasons)



IN THE CIRCUIT COURT OF THE 17<sup>TH</sup>  
JUDICIAL CIRCUIT IN AND FOR  
BROWARD COUNTY, FLORIDA

CIVIL DIVISION

BRADLEY J. EDWARDS, and  
PAUL G. CASSELL,

CASE NO. CACE 15-000072

Plaintiffs,

v.

ALAN DERSHOWITZ,

Defendant.

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**CONSOLIDATED REPLY IN SUPPORT OF NON-PARTY JANE DOE NO. 3<sup>1</sup> AND  
BOIES, SCHILLER & FLEXNER LLP's MOTIONS TO QUASH OR FOR  
PROTECTIVE ORDERS REGARDING SUBPOENA SERVED ON THE NON-PARTIES**

Defendant served virtually identical subpoenas on non-party [REDACTED] and her counsel Boies, Schiller & Flexner LLP ("BSF"). In an effort to conserve judicial resources, the non-parties are submitting a consolidated reply requesting that this Court quash the unreasonable and oppressive subpoenas pursuant to Florida Rules of Civil Procedure 1.410(c)(1), or alternatively, issue protective orders sharply limiting the scope of the abusive subpoenas pursuant to Florida Rules of Civil Procedure 1.280(c).

**INTRODUCTION**

After publicly stating that his main goal in seeking discovery from [REDACTED] is to put her in "jail"<sup>2</sup>, Defendant served this non-party with a subpoena containing twenty five (25) unreasonable and oppressive requests. It is without question that [REDACTED] was sexually abused as

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<sup>1</sup> Jane Doe No. 3 is [REDACTED] and will hereinafter be referred to as [REDACTED]

<sup>2</sup> See Exhibit 1, CNN International, New Day, January 6, 2015. See also Exhibit 2, Australian Broadcasting System (ABC), January 6, 2015. "My goal is to bring charges against the client and require her to speak in court."

Jeffrey Epstein. Defendant spends over five (5) pages discussing the federal action and eleven (11) of his subpoena Requests (Jane Doe Subpoena 1, 5, 6, 7, 8, 9, 12, 13, 14, 22 and 24; BSF Subpoena 3, 6, 7, 8, 9, 10, 12, 13, 14, 19 and 22) relate to the federal action or Jeffrey Epstein.

For example, Request 24 seeks “All documents concerning, relating or referring to your assertion that you met former President Bill Clinton, former Vice President Al Gore and/or Mary Elizabeth “Tipper” Gore on Little Saint James Island in the U.S. Virgin Islands.” Defendant claims that this discovery would go to the issue of whether or not [REDACTED] is telling the truth about Defendant – but that effort at impeachment is clearly collateral at best and fails to address the central issue in this case. That issue is whether the Defendant had any basis to support his media assault against two lawyers claiming that they fabricated and then publicly filed false charges of criminal conduct on the part of the Defendant. It is the Defendant’s credibility and not the credibility of [REDACTED] that is the focus of this defamation action. Defendant suggests that [REDACTED] must be a liar because it would be unheard of for one of Epstein’s young girls to have met President Clinton. Quite the opposite is true. There are a number of accounts documenting Clinton’s regular visits with Epstein. For example, [REDACTED] recently showed pictures on The Inside Edition program of her travels with other young women in the company of Bill Clinton and Jeffrey Epstein on Epstein’s plane. *See Exhibit 4, ‘Lolita Express’ Masseuse Reveals Lurid Details from Jeffrey Epstein’s Private Plane For the Rich*, Inside Edition, April 27, 2015. The Epstein flight logs also demonstrate that former President Bill Clinton traveled with Jeffrey Epstein and other young women. *See Exhibit 5, The Gauker*, January 22, 2015. All of that information, while no doubt interesting, is irrelevant to the defamation issue before this Court except to the extent it casts doubt on the Defendant’s own credibility.

# EXHIBIT B

Professor Alan Dershowitz  
Harvard Law School  
1575 Massachusetts Avenue  
Hauser Hall 518  
Cambridge, MA 02138

Hon. Louis J. Freeh  
[REDACTED]  
[REDACTED]

January 22, 2016

RE: FOIA Request

Dear Professor Dershowitz:

As you know, on April 6, 2015, a request was made to the United States Secret Service under the federal Freedom of Information Act (FOIA; 5 U.S.C. Sec. 552), relating to the period 1/01/01 to 1/1/03, for "any and all shift logs, travel records, itineraries, reports and other records for USSS personnel traveling with former President Bill Clinton to Little St. James Island and the US Virgin Islands" (Attachment A).

The basis of the above-described FOIA request was a claim by [REDACTED], in court papers filed in early 2015 in Florida federal court, that she and former President Clinton were on Little St. James Island at the same time during the 1/01/01 to 1/1/03 period.

As set forth in a January 16, 2016 letter from Kim E. Campbell, United States Secret service Special Agent In Charge, Freedom of Information Act and Privacy Act Officer, the "USSS has conducted a reasonable search for responsive records. It appears, from a review of USSS main indices, that there are no records pertaining to your request that are referenced in these indices" (Attachment B).

I therefore conclude from this response that former President Clinton did not in fact travel to, nor was he present on, Little St. James Island between January 1, 2001 and January 1, 2003.

Based upon my experience and knowledge of the duties, protocols and operations of USSS Protective Details, the Special Agents accompany and escort former President Clinton 24 hours per day, and would have certainly went with him to Little St. James Island during the period at issue. If the Agents had accompanied the former President to that location, they would had been required to make and file shift logs, travel vouchers and related documentation relating to the visit.

The total absence of any such records and documentation, in my opinion, strongly establishes that former President Clinton was not present on Little St. James Island during the period at issue.

Best Regards,



Louie Freeh



DEPARTMENT OF HOMELAND SECURITY  
UNITED STATES SECRET SERVICE  
WASHINGTON, D.C. 20223

Freedom of Information Act and Privacy Act Branch  
Communications Center  
245 Murray Lane, SW, Building T-5  
Washington, D.C. 20223

Date: 910Z 91 JAN

Patti Bescrypt  
3711 Kennett Pike, Suite 130  
Wilmington, DE 19807

File Number: 20150826

Dear Requester:

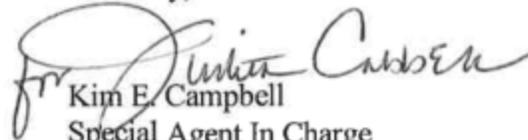
This is the final response to your Freedom of Information Act/Privacy Acts (FOIA/PA) request originally received by the United States Secret Service (USSS) on April 16, 2015, for information pertaining to any and all shift logs, travel records, itineraries, reports, and other records for USSS personnel traveling with former President Bill Clinton to Little St. James Island and the US Virgin Islands.

In response to your request, the USSS has conducted a reasonable search for responsive records. It appears, from a review of USSS main indices, that there are no records pertaining to your request that are referenced in these indices. Enclosed is a copy of your original request.

Alternatively, if you deem our decision an adverse determination, you may exercise your appeal rights. Should you wish to file an administrative appeal, your appeal should be made in writing and received within sixty (60) days of the date of this letter, by writing to: Freedom of Information Appeal, Deputy Director, U.S. Secret Service, Communications Center, 245 Murray Lane, S.W., Building T-5, Washington, D.C. 20223. If you choose to file an administrative appeal, please explain the basis of your appeal and reference the case number listed above.

If you have any questions or would like to discuss this matter, please contact this office at [REDACTED] FOIA File No. 20150826 is assigned to your request. Please refer to this file number in all future communication with this office.

Sincerely,

  
Kim E. Campbell  
Special Agent In Charge

Freedom of Information Act & Privacy Act Officer

Enclosure: Copy of Original Request

Patti Bescrypt  
3711 Kennett Pike  
Suite 130  
Wilmington, DE 19807  
302 824 7144

April 6, 2015

Delores Barber  
Deputy Chief FOIA Officer, Director, Disclosure & FOIA, The Privacy Office  
Department of Homeland Security  
Headquarters & Privacy Office  
Building 410 - STOP-0655  
245 Murray Drive, SW  
Washington, DC 20528-0655

**FOIA REQUEST**

Dear FOIA Officer:

Pursuant to the federal Freedom of Information Act, 5 U.S.C. § 552, I request access to and copies of For the period 1/1/01 to 1/1/03, any and all shift logs, travel records, itineraries, reports, and other records for USSS personnel traveling with former President Bill Clinton to Little St James Island and the US Virgin Islands.

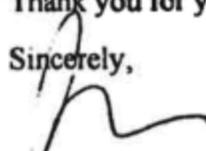
I agree to pay reasonable duplication fees for the processing of this request.

If my request is denied in whole or part, I ask that you justify all deletions by reference to specific exemptions of the act. I will also expect you to release all segregable portions of otherwise exempt material. I, of course, reserve the right to appeal your decision to withhold any information or to deny a waiver of fees.

I look forward to your reply within 20 business days, as the statute requires.

Thank you for your assistance.

Sincerely,



Patti Bescrypt