

EXHIBIT

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Federal Bureau of Investigation

Records Information/Dissemination Section
170 Marcel Drive
Winchester, Virginia

January 22, 2020

Sent via Facsimile and Certified Mail

Dear Sir/Madame:

I am a Forensic Intelligence Analyst and a congressional consultant. I am also a paralegal with extensive experience regarding informant practices related to the FBI and their handling of taxpayer-funded, Top Echelon informants. I've been in documentaries, national and international newspapers, and many television news appearances discussing informants who commit serious crimes while working under FBI auspices. Additionally, I was an independent consultant and lead talent on the Spike documentary, "Gone -- The Forgotten Women of Ohio." That series, submitted for a Peabody award, ran for eight episodes about, in part, murdered and missing women and informants; corruption; and human and drug trafficking. These matters are all addressed in this request.

This request pertains to Jeffery Epstein, born January 20, 1953 in Brooklyn, New York, and deceased August 10, 2019 in the federal Metropolitan Correctional Center New York. A copy of his obituary is attached to this letter. Under the Freedom of Information Act (FOIA) (5 U.S.C. § 552), and President John F. Kennedy Assassination Records Act of 1992, (44 U.S.C. §2107), I request that the Federal Bureau of Investigation produce copies of any informant files, records or materials on or pertaining to Jeffrey Epstein, including but not limited to any informant file or Top Echelon (TE) informant file, Confidential Human Source (CHS) Reporting documents, and any Federal Central Inmate Monitoring System (CIMS) records wherever they may be located or filed and in whatever form or format they may be maintained.

I further request photographic copies of all photographs of Mr. Epstein. I'd like to expand the photos, images or aerial images or any metadata pertaining thereto. With respect to electronic surveillance materials, please provide not only the

transcripts, logs, and other written materials pertaining thereto, but also any audio or videotapes in the format in which they were recorded.

Please include copies of any agreements with Epstein, or draft copy, or proffer agreement with Epstein and the FBI.

Include in this request all correspondence, memoranda, documents, reports, records, statements, audits, lists of names, applications, diskettes, flash drives, letters, expense logs, and receipts, calendar or diary logs, facsimile logs, flight logs, telephone records, call sheets, tape recordings, video/movie recordings, notes, ticklers, numbered and lettered subfiles, 1A envelopes, enclosures behind files, (EBF's), file covers, bulky exhibits ('Bulkies'), control files, and 'JUNE' or 'JUNE MAIL' files or records, examinations, opinions, folders, files, books, manuals, magazines, main discs, any mini storage files and records including and relating to mini storage 989-9779, and any records in file number storage unit files and records, archival storage unit files and records, pamphlets, forms, closed or transferred subfiles, jottings, telephone messages, message slips, post it notes or sticky's, drawings, charts, photographs, electronic mail, and other documents and records or materials that refer or relate to Epstein and/or the 7 categories below in any way, within twenty (20) business days.

In conducting the search, please use all nicknames, aliases, pseudonyms, code names or code numbers used by, or applied to, Mr. Epstein. In addition, when searching under Mr. Epstein's name, please employ all logical buildups, breakdowns, and variations of his name.

In this request, please search the Central Records System ("CRS") for all main files and all cross-references. This includes all index references to Epstein, including not only the Central Records System ("CRS") indices and ELSUR indices, but any informant or confidential source indices and any indices to any office, bureau, section, division, unit or other component of the FBI which may have records pertaining to him. In providing cross-reference materials, the FBI should provide not only the initial page of the cross-referenced document and those pages to which Jeffrey Epstein's name is indexed but also the entire document. The search of the CRS is not to be limited to the Universal Index component of the CRS, but also must include searches of other components including those specified in Negley v. F.B.I., 658 F. Supp. 2d 50, n.3 (D.D.C. 2009).

In the search of the Electronic ("ELSUR") Indices include a search for not only those ELSUR materials that Mr. Epstein is subject of, but also must include any "mentions" or "overhears."

The search should include files in the FBI Director's Office, the files or folders maintained by any FBI supervisory official in office safes, drawers or file cabinets, and the files maintained by Assistant FBI Directors and files in the office of the SAC in Cincinnati from 1993 to January, 2020 particularly including the current and former office of Angela L. Byers both in Washington, D.C., Cincinnati and Columbus.

The FBI search must include each field office that maintains records on Epstein, for records that are responsive to my request. The FBI Headquarters is aware of all FBI field offices which maintain records on Epstein, whereas I am not. Requiring me to submit requests to each of the approximate 59 field offices would be unduly burdensome and thwart the purpose of the FOIA to facilitate easy and prompt access to information.

Mr. Epstein's file may contain information beginning from an arrest and guilty plea that took place in federal court for a charge of conspiring to steal U.S. Treasury Checks in 1993 or earlier and ending August 10, 2019 the date of his death. I wish to limit the above request to the first 500 pages which fall within the following 7 categories listed below:

1. All warrants or drafts of warrants based in whole or in part on information submitted or provided by Mr. Epstein, including all information submitted by Epstein which was used to support warrants or drafts of warrants based on information provided by him. These records are of particular interest because Mr. Epstein was identified as cooperating with the FBI in an FBI document dated 9/18/08 on a child prostitution and forfeiture case against him. In this document the case agent advised that no federal prosecution would occur as long as Epstein continued to uphold his agreement.¹

¹ This is the same type of unwarranted protection that took place with Top Echelon informant Gregory Scarpa Sr. by his FBI handler R. Lindley DeVecchio which was identified in my case Clemente v. FBI. In addressing that case in 2005, my now deceased partner Dr. Stephen Dresch and I provided the Brooklyn District Attorney's office a

2. Any and all information related to Mr. Epstein in which the FBI identified an associate of Mr. Epstein's criminal activities or his criminal enterprise. Please include in those records where identification was made of a **victim** or an **associate or recruiter of Mr. Epstein's that left from, or were taken to**, ANY locations in Kentucky, New Jersey, Ohio, or Palm Beach, Florida. Please also include records identifying what geographical areas the victims, criminal targets, or Epstein's associates were from, such as the counties, cities, towns, suburbs, and any unincorporated communities' name. Please also identify and release all records in the files that mention criminal targets or associates of Epstein that held positions in public office or were identified as attorneys or judges located in the state of Ohio. This material is important because, during my investigation in Ohio, both on and after the series had ended and through to the present date, several attorneys and I have communicated with senior agents at the Department of Justice Office of Inspector General. During these communications I/we provided information related, in part, to corruption and a human and drug trafficking ring that involves girls that were being trafficked from or were recruited from Ohio and Kentucky and were taken to Palm Beach, Florida and other areas of Ohio, New Jersey and other states. Our reports additionally involved informant[s] who have admitted participation in at least two homicides. One of these murder victims is still missing. The woman that is still missing was a client of a defense attorney who was the subject of an interstate human and drug trafficking investigation in which the DEA provided to and referred to the FBI that included trafficking females to Palm Beach, Florida, New Jersey and other states throughout the U.S.

One of the subject traffickers was identified in a DEA document as being part of the "Eubanks/Mearan organization." A subject in this same case has explained that he would meet with the defense attorney in Columbus with guys from out of state. Some of the girls were from Portsmouth, Chillicothe, and Columbus, Ohio and that the defense attorney was always eager to obtain company to go with him and his buddies to Palm Beach.²

homicide referral that later led to Agent DeVecchio's indictment of four counts of second-degree murder in 2007. See attached.

² This was a sealed DEA warrant application that was made public information by Cincinnati Enquirer on 3/21/19 and again by USA today in the same year. <https://www.cincinnati.com/in-depth/news/2019/03/21/sex-trafficking-trapped-and-trafficked-portsmouth-ohio/2839816002/>

Aside from the DEA referral, in 2017 the Department of Justice Office of Inspector General received from the Senate Judiciary's office and me information about this and other concerns with Ohio that was directed to the FBI's INSD Division for further investigation. My colleagues and I (which included multiple attorneys) were then referred to the U.S. Attorney's Office for the Southern District of Ohio over concerns related to the public corruption aspect, which included information on an FBI agent, a State of Ohio Bureau of Criminal Investigation Agent, a lead detective on a federal task force for murdered and missing women, and an attorney and a judge. The judge has since been suspended in a separate matter, and is now retired. The defense attorney is currently under an investigation involving human trafficking and other major crimes. The detective on the federal task force has been removed from his position with the federal authorities and thereafter abruptly resigned from his position with the Sheriff's Office of Ross County, Ohio, which he was employed by while working on the federal task force.

A detective who, on information and belief, possessed a fictitious New Jersey ID, was also under both state/federal investigation and has since retired in 2019. **Also See Attached Letter to Ohio Auditor's Office regarding task force officer.** The U.S. Attorney's Office for the Southern District of Ohio is scheduling an upcoming appointment to further discuss matters related to potential physical evidence in the above related matter of human trafficking, public corruption and homicide. The records that I am requesting here will shed light on the government operations that are flawed in which it appears to have essentially provided a ripe opportunity for more victims to be victimized and sexually exploited by informant[s], and those who hold a position in public office in which these victims and their communities were reliant upon for their safety and the proper application of the law.

3. All records pertaining to or referencing Portsmouth, Ohio Attorney Michael Mearan. Also include records pertaining to or referencing William Marshall or Mark Eubanks.

4. All records in any informant file in chronological sequence, commencing with the present year 2020 through to the earliest date.

5. All records that has FBI employee Angela L. Byers name, or codename, or signature, or initials on them pertaining to any Epstein investigation related to

Ohio or mentioning Ohio, New York, New Jersey, or Palm Beach, Florida. Many cases that I, and law enforcement officials, have requested the FBI to investigate issues related to FBI informants and their handlers' informant practices were regularly dismissed by Angela L. Byers and the offices in which she was employed. Angela L. Byers' former office was located in Cincinnati, where she was a Special Agent in Charge (SAC). At the time, she was an SAC over one of the FBI agents and a BCI agent that the DOJ IG's office submitted to the FBI's INSD division (a division in which she had previously been employed) for further investigation. But not one witness that agreed to cooperate with the FBI officials, including former and current law enforcement officials, was contacted by the FBI. Moreover, one local low-level informant was willing to provide the location of the body of a woman who remains missing, but the Ohio Bureau of Criminal Investigation Agent who was on the federal task force and the FBI Agent chose to never contact the informant, who was a participant in the woman's homicide. The lead detective on that case was the detective that was also on the federal task force with the FBI and BCI Agent mentioned above, and he has since resigned from his position after the discovery of misconduct related directly to him. The missing victim was a client of the defense attorney who was under investigation for trafficking women to Palm Beach, Florida and other states. I suspect these documents' release will shed light on the FBI's failures to protect murdered and missing women in Ohio, and those trafficked to Palm Beach, Florida, New Jersey and other states. One of Jeffrey Epstein's victims has been recently reported to say that she was taken to one of Epstein's associates homes, in Ohio, and assaulted there. A lawsuit is pending on this issue.

6. All records pertaining to Epstein victims associated in any way with Ohio or pertaining to Ohio, Kentucky or New Jersey that were taken to Palm Beach, Florida or were brought from Palm Beach, Florida to other states or countries including which states or countries the victims were brought to by Epstein or his associates.

7. All records pertaining to any FBI internal investigations related to Epstein, or Epstein and Ohio, whether located in the FBI Inspection Division (FBI-INSD), National and Transnational Organized Crime section, Office of Professional Responsibility, Public Corruption Division, Units, or Offices, Violent Crime Divisions, FBI Cincinnati Field Division (White Slave Trafficking investigation) FBI Cincinnati Field Division Human trafficking investigations, FBI Detroit Field Division

Extortion Investigation, FBI Cincinnati Field Division Mexican Drug Trafficking Organization investigation files, FBI Cincinnati Field Division Violent Gang investigation or DEA Cincinnati Resident Office Investigation referrals to the FBI; and also FBI civil litigation division files or records of any kind whatsoever, and Counter-Intelligence Sections.

If after the 500-page limit has been reached other informant materials remain, please advise us of the approximate number of pages they comprise.

Please also advise us that you have placed my request in the "short hit" queue and inform us of an approximate date when I will begin receiving the requested records.

If any responsive record or portion thereof is claimed to be exempt from production under FOIA, sufficient identifying information (with respect to each allegedly exempt record or portion thereof) must be provided to allow the assessment of the propriety of the claimed exemption. *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir 1973), cert denied, 415 U.S. 977 (1974). Additionally, any reasonably segregable portion of a responsive record must be provided to me after redactions of any allegedly exempt material, as the law requires. 5 U.S.C. § 552(b). In order to help to determine my status for purposes of determining the applicability of any fees, you should know that I am a

I am willing to pay fees up to \$50.00. If the fees will exceed this amount, please inform me before fees are incurred. I can be contacted at Angelaclemente.forensics@gmail.com, if necessary to discuss any aspect of this request. Under 5 U.S.C. § 552(a)(4)(A)(iii), I hereby request a full fee waiver for public interest. The materials that I seek will shed significant light on government operations and activities with informant practices similar to those I have already successfully helped to correct flaws. See, for example, DOJ-IG Special Report from September 2005, regarding in part a case I was involved in related to Top Echelon Informant Gregory Scarpa Sr. and his handler Lindley DeVecchio. This was information that I provided to the U.S. House of Representatives that was later submitted by them to the Department of Justice Office of Inspector General (DOJ IG). The DOJ-IG also used my case as an example in their Special Report. Similarly, the materials requested here will, among other things, shed light on (1) what the FBI knew about Epstein's criminal activities while he was serving as an FBI

informant; (2) the extent to which Epstein's relationship to the FBI corrupted the system of justice; (3) how many victims were identified after the FBI chose to not prosecute Epstein in 2008; (4) whether Epstein was working and conspiring with others in public office who facilitated his conduct, by among other things, contacting victims and scheduling or facilitating sexual encounters with Epstein or his associates (some of whom are or may currently be under state and federal investigation in geographical areas such as Scioto, Ross and Franklin Counties, Ohio), especially as related to interstate human trafficking and murder. I have already been directly investigating and have been in direct communication with the U.S. Attorney's Office Southern District of Ohio, Chief of the Criminal Division Kenneth Parker, regarding many of the human trafficking cases in Ohio. I was directed to Mr. Parker after the DOJ-IG referred some of these cases over to the FBI's INSD for review.

I am capable of disseminating the information to the public. Indeed, prominent members of the news media have indicated their interest in covering not only the disclosure of any records pursuant to my request but the filing of Freedom of Information lawsuit to obtain them. I look forward to receiving the requested documents and a full fee waiver within twenty business days.

Please address any further correspondence to this request to both me and to my attorneys Julia Greenberg, Jim Lesar, and Jay Hurst at the following addresses:

Jay Hurst
1890 Star Shoot Parkway
Suite 170, PMB 371
Lexington, Kentucky 40509

Jim Lesar
930 Wayne Avenue
Unit 1111
Silver Springs, MD 20910

Julia Greenberg
160 Broadway
4th Floor
New York, New York 10038

Thank you for your time and consideration and I look forward to receiving the requested documents.

Cordially,

A handwritten signature in cursive script that reads "Angela Clemente".

Angela Clemente-Russo