

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

ANGELA CLEMENTE,	:
	:
Plaintiff,	:
v.	: C. A. No. 20-1527 (TNM)
FEDERAL BUREAU OF	:
INVESTIGATION,	:
<i>et al.</i> ,	:
	:
Defendants	:

PLAINTIFF’S ERRATUM

Plaintiff Angela Clemente (“Clemente”), by and through her counsel, James H. Lesar (“Lesar”), hereby gives notice of the following errata contained in the sections captioned, “Joint Status Report” (“JSR”) and in the section captioned Plaintiff’s Position which the parties filed on May 21, 2021.

Par. 1 in the section captioned, “Joint Status Report” states, “Pursuant to the Courts Minute Order dated March 23, 2021, Plaintiff Angela Clemente and Defendants, The U.S. Department of Justice (the “Department”) and the Federal Bureau of Investigation (“FBI”), respectfully submit the following status report in this Freedom of Information Act (“FOIA”) action in which Plaintiff has requested records from the FBI concerning Jeffrey Epstein.”

Par. 1 under “Plaintiff’s Position” states that “It is Plaintiff’s position that Clemente has identified in her complaint as directly related or tangentially related to top echelon informants committing crimes under the auspices of the FBI.”

The above paragraph inaccurately represents the scope and application of Clemente’s request for records and information pertaining to Jeffrey Epstein and others that were identified in her complaint.

Under pressure from Defendants’ to meet a self-imposed 11:00pm deadline the above quoted paragraph does not accurately reflect what Clemente intended to convey. It should state, “It is Plaintiff’s position that the records sought are records, materials, and or information sought by Clemente under the Freedom of Information Act (FOIA), Privacy Act (PA), JFK Assassination Records Act and other disclosure mechanisms that are directly and or peripherally related to Jeffrey Epstein and others;

This includes, for example, informants, top echelon informants, confidential informants, confidential sources, confidential witnesses, and others in public office that Clemente has alleged in her complaint or elsewhere as committing crimes, offenses or conduct while working under the auspices of the FBI, The Department of Justice, Federal Bureau of Prisons and State Prisons, Bureau of Criminal Investigations (BCI), Department of Justice Inspector General, Ohio State Attorney

General, Organized Crime Task Forces (state, local or federal), Congressional Investigations, Interpol, and Judicial inquiries including grand jury investigations;

It further includes investigations conducted by the United Nations and other countries around the globe where records pertinent to Jeffrey Epstein and others alleged in the complaint may exist.

Any administrative records pertinent to the above numerated entities are also included.

Respectfully Submitted,

_____/s/_____

James H. Lesar, No. 114413
930 Wayne Ave., Unit 1111
Silver Spring, MD 20910
Phone: (301) 328-5920
Email: jhlesar@gmail.com
Attorney for Angela Clemente

Dated May 24, 2021