

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JANE DOE 1, et al.,)	Civil Action No. 24-2743 (RBW)
)	
)	
)	
Plaintiffs,)	
)	
vs.)	
)	
UNITED STATES OF AMERICA)	
)	
)	
Defendant.)	
_____)	

DECLARATION OF JORDAN MERSON

I, Jordan Merson, of full age, make the following declaration in opposition to Defendant's Motion to Dismiss:

1. Attached as Exhibit 1 hereto is a true and correct copy of a letter dated February 27, 2025 from Attorney General Pamela Bondi to FBI Director Kash Patel, retrieved from <https://www.justice.gov/ag/media/1391331/dl?inline> and last visited March 14, 2025.
2. Attached as Exhibit 2 hereto is a true and correct copy of excerpts from the Attorney General's Guidelines for Domestic FBI Operations, dated September 29, 2008 and signed by Attorney General Michael B. Mukasey, retrieved from <https://www.justice.gov/archive/opa/docs/guidelines.pdf> and last visited March 14, 2025.
3. Attached as Exhibit 3 hereto is a true and correct copy of an excerpt of page 15 from the FBI Vault relating to the Epstein investigation, retrieved from <https://vault.fbi.gov/jeffrey-epstein/Jeffrey%20Epstein%20Part%2003/view> and last visited March 14, 2025.

Dated March 14, 2025

By: 
Jordan Merson, Esq.

EXHIBIT 1



Office of the Attorney General
Washington, D. C. 20530

February 27, 2025

Dear Director Patel,

Before you came into office, I requested the full and complete files related to Jeffrey Epstein. In response to this request, I received approximately 200 pages of documents, which consisted primarily of flight logs, Epstein's list of contacts, and a list of victims' names and phone numbers.

I repeatedly questioned whether this was the full set of documents responsive to my request and was repeatedly assured by the FBI that we had received the full set of documents. Late yesterday, I learned from a source that the FBI Field Office in New York was in possession of thousands of pages of documents related to the investigation and indictment of Epstein. Despite my repeated requests, the FBI never disclosed the existence of these files. When you and I spoke yesterday, you were just as surprised as I was to learn this new information.

By 8:00 a.m. tomorrow, February 28, the FBI will deliver the full and complete Epstein files to my office, including all records, documents, audio and video recordings, and materials related to Jeffrey Epstein and his clients, regardless of how such information was obtained. There will be no withholdings or limitations to my or your access. The Department of Justice will ensure that any public disclosure of these files will be done in a manner to protect the privacy of victims and in accordance with law, as I have done my entire career as a prosecutor.

I am also directing you to conduct an immediate investigation into why my order to the FBI was not followed. You will deliver to me a comprehensive report of your findings and proposed personnel action within 14 days.

I appreciate your immediate attention to this important matter. I know that we are both committed to transparency for the American people, and I look forward to continuing to work with you to serve our President and our country.

Sincerely,

A handwritten signature in black ink, appearing to read "Pam Bondi", is written over the typed name.

Pamela Bondi
Attorney General

EXHIBIT 2

**THE ATTORNEY GENERAL'S GUIDELINES FOR DOMESTIC
FBI OPERATIONS**

PREAMBLE

These Guidelines are issued under the authority of the Attorney General as provided in sections 509, 510, 533, and 534 of title 28, United States Code, and Executive Order 12333. They apply to domestic investigative activities of the Federal Bureau of Investigation (FBI) and other activities as provided herein.

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security, or to obtain information for the conduct of an authorized FBI investigation; or

- g. if dissemination of the information is otherwise permitted by the Privacy Act (5 U.S.C. 552a).

2. Required Sharing

The FBI shall share and disseminate information as required by statutes, treaties, Executive Orders, Presidential directives, National Security Council directives, Homeland Security Council directives, and Attorney General-approved policies, memoranda of understanding, or agreements.

C. INFORMATION RELATING TO CRIMINAL MATTERS

1. Coordination with Prosecutors

In an investigation relating to possible criminal activity in violation of federal law, the agent conducting the investigation shall maintain periodic written or oral contact with the appropriate federal prosecutor, as circumstances warrant and as requested by the prosecutor. When, during such an investigation, a matter appears arguably to warrant prosecution, the agent shall present the relevant facts to the appropriate federal prosecutor. Information on investigations that have been closed shall be available on request to a United States Attorney or his or her designee or an appropriate Department of Justice official.

2. Criminal Matters Outside FBI Jurisdiction

When credible information is received by an FBI field office concerning serious criminal activity not within the FBI's investigative jurisdiction, the field office shall promptly transmit the information or refer the complainant to a law enforcement agency having jurisdiction, except where disclosure would jeopardize an ongoing investigation, endanger the safety of an individual, disclose the identity of a human source, interfere with a human source's cooperation, or reveal legally privileged information. If full disclosure is not made for the reasons indicated, then, whenever feasible, the FBI field office shall make at least limited disclosure to a law enforcement agency or agencies having jurisdiction, and full disclosure shall be made as soon as the need for restricting disclosure is no longer present. Where full disclosure is not made to the appropriate law enforcement agencies within 180 days, the FBI field office shall promptly notify FBI Headquarters in writing of the facts and circumstances concerning the criminal activity. The FBI shall make periodic reports to the Deputy Attorney General on such nondisclosures and incomplete disclosures, in a form suitable to protect the identity of human sources.

EXHIBIT 3

(Rev. 01-31-2003)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 04/20/2007

To: Criminal Investigative

Attn: Crimes Against Children Unit

UC
IAb6 -1, -2
b7C -1, -2

From: Miami

PB-2/PBCRA
Contact: SA [REDACTED]

Approved By: [REDACTED]

Drafted By: [REDACTED]

Case ID #: 31E-MM-108062 (Pending)

Title: JEFFREY EPSTEIN;

[REDACTED]
WSTA - CHILD PROSTITUTION

Synopsis: To request Intelligence Analyst (IA) [REDACTED] travel to Palm Beach RA to assist with analysis for captioned case.

b6 -2
b7C -2

Details: On [REDACTED] the Federal Bureau of Investigation (FBI), Palm Beach County Resident Agency (PBCRA), opened an investigation involving billionaire Jeffrey Epstein and captioned subjects. The investigation involves [REDACTED]

b3 -1
b6 -1, -3
b7C -1, -3
b7E -4[REDACTED]
FBI Miami, PBCRA, requests the travel of IA [REDACTED] Crimes Against Children Unit (CACU), for the purpose of assisting with [REDACTED] for captioned case.b6 -2
b7C -2
b7E -1

03956-853

31E-MM-108062-84

To: Criminal Investigative From: Miami
Re: 31E-MM-108062, 05/02/2007

LEAD(s):

Set Lead 1: (Action)

CRIMINAL INVESTIGATIVE

AT WASHINGTON, DC

Approval request for the travel of SSA [redacted]
[redacted] to Miami Division, PBCRA from 05/09/2007 to 05/18/2007
for the purpose of assisting with indictment preparation,
document preparation, chart finalization and to provide
testimony at detention hearing.

b6 -2
b7c -2

♦♦