

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

PLAINTIFF,

VS.

DEBORAH JEANE PALFREY,

DEFENDANT.

Criminal Case Number: 07-046-JR

**MONTGOMERY BLAIR SIBLEY’S MOTION
TO MODIFY RESTRAINING ORDER TO
PERMIT THE RELEASE OF TELEPHONE
RECORDS RECEIVED PURSUANT TO
SUBPOENAS BUT NEVER MADE PUBLIC AND
OTHER RECORDS**

_____ /

Montgomery Blair Sibley (“Sibley”) moves for an Order Modifying the existing Restraining Orders in this matter which have, since 2007, restrained him from releasing certain information he obtained in this matter and to permit him to release the telephone records received pursuant to a subpoena issued in this matter but heretofore never publicly revealed and other records, and for grounds in support thereof states as follows:

I. BACKGROUND

At various times in the above matter, Sibley served as legal counsel to the Defendant, Deborah Jeane Palfrey. In that capacity, Sibley issued subpoena duces tecums to a number of different organizations one of them being Verizon Wireless. On December 14, 2008, Judge Robertson set a status hearing. At that hearing, the following exchanges took place:

THE COURT: Now, the next part of this the next thing I want to turn to is the **subpoenas duces tecum that the defense is issuing**. And these are being issued ex parte, and the defense is entitled to some protection of its own about who it's subpoenaing, but Mr. Sibley, **I have to tell you that I have received inquiries from two or three of the persons and institutions that you've served**, and then there is one motion to quash that I think everybody is aware of – two motions to quash. Well, the so called omnibus motion I have not received. When did you file that? (Emphasis added).

MR. SIBLEY: Your Honor, I would ask the privilege of approaching the Court and answering that question ex parte.

THE COURT: I'll hear you at the bench.

(Whereupon, an EX PARTE BENCH CONFERENCE was held on the record, transcribed under separate cover.)

(END BENCH CONFERENCE.)

THE COURT: The government's omnibus motion to quash was filed yesterday; there is another motion to quash that was filed a day or two ago. Mr. Sibley points out, quite correctly, that he hasn't really had an opportunity to respond to them yet. I think the right thing to do is to pass that issue. But, but a number of the subpoenas that have been issued have been issued returnable tomorrow.

MR. SIBLEY: Correct, Your Honor. It was an odd date, but. . .

THE COURT: I don't know what kind of an order you would call a temporary quashal order, **but I'm quashing all of the subpoenas until we get an opportunity to decide on the government's motion to quash.** So it's a quash without prejudice. The subpoenas remain in effect, but the return date is off. (Emphasis added).

MS. CONNELLY: Your Honor, if I could just seek clarification on one issue, which in fact is in our under seal motion, although this subpoena was not pursuant to the Court's November 13th under seal order. **The defendant also issued a subpoena on the White House with a return date of February 19th, which never was, in fact, the trial date in this case.** The Court set the trial date as April, with a potential backup date of February if Judge Kessler could fit us in in February. The government's omnibus motion addresses that White House subpoena, but I would like to be able to let them know, is that also being temporarily quashed at this point? (Emphasis added).

THE COURT: Yes, everything is temporarily quashed until I look at your omnibus motion. . . .

However, on the December 14, 2008, morning that Sibley was at court with Judge Robertson, one of the subpoenas authorized by Judge Kessler had been answered. Among the subpoenas that Judge

Kessler had authorized in November 2008 was a subpoena to Verizon Wireless, to which Sibley had attached a list of 5,902 telephone numbers that had turned up in Defendant's telephone records. The subpoena had sought the account holder information for each telephone number that appeared in Verizon Wireless' records on the day the call was made to Defendant's escort service.

Thus, it was a surprise to Sibley that when he returned to his office after the December 14th hearing he found a FedEx package from Verizon Wireless containing a CD with Verizon Wireless' response to the subpoena: 815 account holders names, addresses, social security numbers, and home and business telephone numbers—all contained on an Excel spreadsheet. Each name represented a former escort or client who had a cell phone number that had called Defendant's escort service when that cell phone number was owned by that person. Stated another way, Sibley now had 815 new leads who had not, heretofore, been identified through the telephone records by anyone.

The names of the persons/entities identified was stunning. Among the entities whose corporate cell phone numbers showed up were:

- * Washington College
- * Jones Day Reavis and Pogue, a large law firm
- * Archdiocese of Washington
- * Hewlett Packard
- * Akin Gump Strauss, a large law firm
- * The Durst Law Firm
- * Philips Electronics North America
- * NXP Semiconductors USA, Inc. – Providing engineers and designers with semiconductors, system solutions and software that deliver better sensory experiences. Net sales of \$6.32 billion in 2007.
- * Patterson Belknap Webb, a large law firm
- * Defense Group, Inc. – is a high technology company, advancing public safety and national security through innovative research, new technologies, and systems assessments. DGI has key competencies in U.S. strategy and policy, intelligence, Weapons of Mass Destruction, vulnerability assessments, and homeland security, as well as

technologies and products that support first responder and medical communities.

- * The Roger Richman Agency Inc – The Roger Richman Agency, Inc. was purchased by Corbis’ owner Bill Gates in 2005 and is the preeminent licensing agency specializing in protecting and promoting the personae of world renowned entertainment and historic personalities.
- * U.S. Dept of Commerce
- * Internal Revenue Service
- * The Army Capabilities Integration Center – The Army Capabilities Integration Center (ARCIC) is the Army's leader in the identification, design, development, and synchronization of capabilities into the Army current Modular Force and the future Modular Force, bringing together all the Army agencies as well as Joint, Multinational, and other DoD agencies to manage rapid change. ARCIC supports TRADOC in providing adaptive soldiers, leaders and units by contributing to the development of doctrine, TTPs, and the collective training experience.
- * U.S. Army Training and Doctrine Command – TRADOC recruits, trains and educates the Army's soldiers; develops leaders; supports training in units; develops doctrine; establishes standards; and builds the future Army. TRADOC is the architect of the Army and "thinks for the Army" to meet the demands of a nation at war while simultaneously anticipating solutions to the challenges of tomorrow.
- * US Postal Service
- * USPS Information Technology
- * U.S. Coast Guard
- * Embassy of Japan
- * Constellation Energy – Constellation Energy, a Fortune 125 competitive energy company based in Baltimore, is the nation’s largest supplier of wholesale power and competitive electricity to large commercial and industrial customers, and a major generator of electricity, with a diversified fleet of power plants strategically located throughout the U.S.
- * Andersen Consulting
- * Department of Health & Human Services, Office of the Inspector, The National Geospatial Intelligence Agency – is a Department of Defense combat support agency and a member of the national Intelligence Community (IC). NGA develops imagery and mapbased intelligence solutions for U.S. national defense, homeland security and safety of navigation.

- * Reed Smith – a law firm that represents many of the world’s leading companies in complex litigation and other highstakes disputes, crossborder and other strategic transactions, and crucial regulatory matters. With lawyers from coasttocoast in the U.S. as well as in the U.K., continental Europe, Asia, and the Middle East, the firm is known for its experience across a broad array of industry sectors. The firm counsels 28 of the top 30 U.S. banks and 10 of the world's 12 largest pharmaceutical companies.
- * USAISC – U.S. Army Information Systems Command
- * LogicTree–provides innovative IVR solutions for the Transit and 511 markets.
- * The National Drug Intelligence Center – established by the Department of Defense Appropriations Act, 1993. Placed under the direction and control of the Attorney General, NDIC was established to “coordinate and consolidate drug intelligence from all national security and law enforcement agencies, and produce information regarding the structure, membership, finances, communications, and activities of drug trafficking organizations.”
- * Atlantic Research Corporation Political Action Committee
- * Fauquier Bank
- * Lockheed Martin MS2– MS2 provides surface, air, and undersea applications on more than 460 programs for U.S. military and international customers
- * A director of the Defense Contract Management Agency
- * A commander of the 332rd Expeditionary Maintenance Group, Balad Air Base, Iraq
- * A high ranking officer of Colonel Pipeline Company which had reached a Settlement for Oil Spills in Five States
- * An Environmental Protection Agency employee
- * A former president of the National District Attorney Association
- * A Hewlett Packard Director who had made substantial contributions to U.S. Senate races
- * An attorney with the prominent Akin Gump law firm (the law firm that fired “Abbey.” an employee upon learning she was an escort for Defendant)
- * A director of the Association of Foreign Intelligence Officers
- * An attorney with Patterson Belknap Webb & Tyler, another major law firm with deep Washington, D.C. ties
- * A state representative from Louisiana
- * A member of the Maryland Public Service Commission
- * A NASA astronaut
- * A special envoy for Middle East Security appointed by Condoleezza Rice

Plainly, Sibley had the ability – and the intention – to bring a parade of former clients, companies and government agencies in front of the jury to establish either that: (a) no sex was had, or (b) that if sex for money was involved, then “Why Just Jeane?” Additionally, Verizon Wireless provided to Sibley the account information for some forty (40) escort agency telephone numbers listed in the 2007 Verizon Yellow Pages as operating in the Metro D.C. area.

However, given that Judge Robertson had just quashed all of Sibley’s subpoenas, it was – and remains – unclear as to what was the legal status of this Verizon Wireless subpoena response. Moreover, a number of prior and subsequent restraining orders were issued in this – and the ancillary civil suits – regarding disclosure of information obtain in this matter. *Viz*: For example, the March 22, 2007, Post-Indictment Restraining Order, a copy of which is attached hereto.

II. MOTION TO PERMIT PUBLIC RELEASE OF RECORDS IN THIS MATTER

Sibley is scheduled to teach a course on Privacy Law¹ at Northern Virginia Community College starting on February 17, 2016. As part of that course, Sibley will be discussing the privacy implications arising out of the instant case including, the issues arising from the perspective of the customers of Defendant’s escort service, the private and public agencies that received subpoenas and the national security issues involved. Accordingly, utilization of the Verizon Wireless subpoena response would be valuable as a teaching aid in this regard as it highlights the lack of privacy in commercial sex behavior and the proof of Sibley’s proposition that we do not have a *justice system* but *just-a-system* geared to protecting the empowered from the claims of the dis-empowered.

Noteworthy is that: (i) since 2007 there has not been a major escort service prosecution by the federal government in the District of Columbia yet (ii) brazenly advertising in the 2016 Yellow

¹ See: <http://www.privacycomplianceconsulting.com/privacy-law-course>

Pages are twenty-two (22) escort services which have been operating with impunity since the 2007 prosecution of Defendant Jeane Palfrey. A copy of the 2016 Washington D.C. Yellow Pages is attached.

This apparent disparate treatment of the Defendant's escort service raises a public policy rationale for the release of such information regarding public and or quasi-public actors as Sibley believes that within that presently sealed-from-the-public record contains the answer to the question: Was Defendant Deborah Jeane Palfrey's prosecution politically-motivated and is this Court part-and-parcel of keeping that knowledge from the public? As John F. Kennedy famously said: "The very word 'secrecy' is repugnant in a free and open society; and we are as a people inherently and historically opposed to secret societies, to secret oaths, and to secret proceedings."

Here, by keeping the relevant Verizon Wireless information sealed from public view – particularly during this election cycle – deprives the People of the information they may deem material to the exercise of the People's right to vote and continues what is in essence a "secret proceeding" for no legitimate public purpose.

III. CONCLUSION

WHEREFORE, Sibley respectfully requests an order modifying the Restraining Orders to permit the use and/or public release by him of: (i) the records received from Verizon Wireless and (ii) upon a showing of good cause and after judicial review, such other documents contained in the materials seized by the government and/or received pursuant to other subpoenas issued in this matter.

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served by U.S. First Class mail upon: Channing D. Phillips, United States Attorney for the District of Columbia, 555 4th St., N.W., Washington, D.C. 20530 this January 11, 2016.

MONTGOMERY BLAIR SIBLEY
402 King Farm Blvd, Suite 125-145
Rockville, Maryland, 20850
202-643-7232
montybsibley@gmail.com

A handwritten signature in black ink, appearing to read "M. Blair Sibley", written in a cursive style.

By: _____
Montgomery Blair Sibley

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

PLAINTIFF,

VS.

DEBORAH JEANE PALFREY,

DEFENDANT.

CRIMINAL CASE NUMBER: 07-046-GK

**ORDER ON MONTGOMERY BLAIR SIBLEY'S
MOTION TO MODIFY RESTRAINING ORDER
TO PERMIT THE RELEASE OF TELEPHONE
RECORDS RECEIVED PURSUANT TO
SUBPOENAS BUT NEVER MADE PUBLIC AND
OTHER RECORDS**

_____/

THIS MATTER, having come on to be heard on Montgomery Blair Sibley's Motion to Modify Restraining Order to Permit the Release of Telephone Records Received Pursuant to Subpoenas but Never Made Public and Other Records, and the Court being fully advised in the premises, it is

ORDERED AND ADJUDGED, that the motion is granted. Sibley may release as he deems fit any and all records in his possession related to this matter.

DONE AND ORDERED in Chambers, Washington, D.C. this ____ day of _____, 2016.

By: _____
United States District Judge

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

CRIMINAL NO. 07-046 (GK)

v.

DEBORAH JEANE PALFREY

aka "Jeane Palfrey,"

aka "Julia,"

aka "Pamela Martin,"

Defendant.

FILED

MAR 22 2007

NANCY MAYER WHITTINGTON, CLERK
U.S. DISTRICT COURT

POST-INDICTMENT RESTRAINING ORDER

The United States has made an *ex parte* application to this Court, pursuant to 18 U.S.C. 1963(d)(1) and 18 U.S.C. § 982(b)(1) (incorporating 21 U.S.C. § 853(e)(1)(A)), for a Post-Indictment Restraining Order to preserve the availability of certain property that is subject to forfeiture in the above-styled criminal action. Upon consideration of the Government's application and the Indictment of **DEBORAH JEANE PALFREY**, it appears to the Court that there is reasonable cause to enter a restraining order to preserve the subject property based upon the following:

1. That on March 1, 2007, a Federal Grand Jury of this district returned a multi-count Indictment charging defendant **DEBORAH JEANE PALFREY** with a number of felony offenses, including violations of 18 U.S.C. § 1962(c) (Racketeer Influenced and Corrupt Organizations (RICO)); 18 U.S.C. § 1952(a)(3) (Travel in Interstate Commerce in Aid of Racketeering Enterprises); and 18 U.S.C. § 1952(h) (Conspiracy to Commit Money Laundering). The Indictment also included two forfeiture allegations, pursuant to 18 U.S.C. §§ 982(a)(1) and 1963, and by which the United States seeks the criminal forfeiture of the following property:

(N)

i. any interest **DEBORAH JEANE PALFREY** acquired or maintained in violation of Title 18, United States Code, Section 1962, which interests are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1);

ii. any interest in, security of, claims against, and property and contractual rights which afforded a source of influence over the enterprise named and described in the Indictment and which the **DEBORAH JEANE PALFREY** established, operated, controlled, conducted, or participated in the conduct of, in violation of Title 18, United States Code, Section 1962, which interests, securities, claims, and rights are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(2);

iii. and any property constituting and derived from proceeds **DEBORAH JEANE PALFREY** obtained, directly and indirectly, from racketeering activity, in violation of Title 18, United States Code, Section 1962, which property is subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(3).

2. That the interests of the defendant subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1), (a)(2), and (a)(3), and Title 18, United States Code, Section 982, include but are not limited to:

a money judgment of at least \$988,610 based on the money laundering charge and 18 U.S.C. § 982, and a money judgment of at least \$2,075,384 based on the RICO charge and 18 U.S.C. § 1963, and all interest and proceeds traceable thereto, including but not limited to the following assets:

a. \$276,645.97 in funds from Charles Schwab investment

accounts 6884-3181, 6884-3186, and 6884-3192, and approximately \$135,442.60 in stocks maintained in these accounts by Charles Schwab, a total amount of \$11,396.35 from Wells Fargo accounts 6952-139217 and 005-9211417 (hereafter collectively "the Accounts").

The funds and stocks are more fully described as:

- (1) Charles Schwab Account 6884-3181 (funds \$36,458.67);
- (2) Charles Schwab Account 6884-3186 (funds \$188,403.71; stock approximately \$125,432.60);
- (3) Charles Schwab Account 6884-3192 (funds \$51,783.59; stock approximately \$10,010.00);
- (4) Wells Fargo Account 6952-139217 (funds \$2,055.68); and
- (5) Wells Fargo Account 005-9211417 (funds \$9,340.67).

b. Coins seized from 803 Capitol Street, Vallejo, California, and are more fully described as:

- (1) 413 South African Gold Krugerrands;
- (2) 81 U.S. Liberty \$50 Gold Coins;
- (3) 320 U.S. Liberty \$1 Silver Coins; and
- (4) 61 Canadian \$50 Gold Coins.

c. at least \$182,529.59 of equity in the Real Property more fully described as:

803 Capitol Street, Vallejo, California 94590, more fully described as:

The North Seventy (70) Feet of Lot Nine (9) in block Three Hundred and Six (306), as the same is shown on the official map of the City of Vallejo, made by E.H. Rowe, C.S.,

and which map was filed for record in the Office of the County Recorder of Solano County, California, September 19, 1868, in Book 1 of Maps, Page 123; and,

d. Real property more fully described as:

1441 Vaquero Glen, Escondido, California 92026, more fully described as:

Lot 17 of Escondido Tract No. 350 in the City of Escondido, County of San Diego, State of California according to map thereof No. 9034, filed in the Office of the County Recorder of San Diego County on November 22, 1978.

3. That subsequent to the Grand Jury's return of the Indictment, **DEBORAH JEANE PALFREY** has publicly identified an additional asset of the enterprise named and described in the Indictment, which property, or proceeds traceable thereto, would be subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(3), that is: business records, including all records reflecting clients or customers of the enterprise named and described in the Indictment.

4. That **DEBORAH JEANE PALFREY**, or her agents or attorneys, have publicly expressed an intent to sell, transfer or otherwise to dissipate certain assets that she possesses or controls and that are subject to forfeiture.

5. That the Federal Grand Jury's Indictment of **DEBORAH JEANE PALFREY**, which specifically identified property as being subject to forfeiture under applicable statutes establishes sufficient probable cause for the issuance of this restraining order.

6. That in the event **DEBORAH JEANE PALFREY** is convicted of the charges alleged in said Indictment, the subject property would be subject to forfeiture under 18 U.S.C. §§ 1963 and/or 982.

7. That the need to preserve the availability of the subject property through the entry of the order requested herein outweighs the hardship on any party against whom the order is to be entered.

8. That any third party claims to the subject property may be properly brought and resolved in ancillary proceedings conducted by this Court following the execution of a Preliminary Order of Forfeiture in accordance with the provisions of federal forfeiture law.

THEREFORE, IT IS HEREBY ORDERED AND DECREED:

That, effective immediately, **DEBORAH JEANE PALFREY**, her agents, servants, employees, attorneys, family members and those persons in active concert or participation with her, and those persons, financial institutions, or other entities who have any interest or control over the subject property are hereby

RESTRAINED, ENJOINED, AND PROHIBITED, without prior approval of this Court and upon notice to the United States and an opportunity for the United States to be heard, from attempting or completing any action that would affect the availability, marketability or value of said property, including but not limited to selling, transferring, assigning, pledging, distributing, encumbering, wasting, secreting, depreciating, damaging, or in any way diminishing the value of, all or any part of their interest, direct or indirect, in the following property:

1. BANK/INVESTMENT ACCOUNTS

Funds, interest and credits in banking, brokerage and investment accounts

held by or for the benefit of any the defendant, **DEBORAH JEANE PALFREY**, at financial institutions, including but not limited to the following:

- a. \$276,645.97 in funds from Charles Schwab investment accounts 6884-3181, 6884-3186, and 6884-3192, and approximately \$135,442.60 in stocks maintained in these accounts by Charles Schwab, a total amount of \$11,396.35 from Wells Fargo accounts 6952-139217 and 005-9211417 (hereafter collectively “the Accounts”).

The funds and stocks are more fully described as:

- (1) Charles Schwab Account 6884-3181 (funds \$36,458.67);
- (2) Charles Schwab Account 6884-3186 (funds \$188,403.71; stock approximately \$125,432.60);
- (3) Charles Schwab Account 6884-3192 (funds \$51,783.59; stock approximately \$10,010.00);
- (4) Wells Fargo Account 6952-139217 (funds \$2,055.68); and
- (5) Wells Fargo Account 005-9211417 (funds \$9,340.67).

2. PERSONAL PROPERTY

- a. Coins seized from 803 Capitol Street,

Vallejo, California, and are more fully described as:

- (1) 413 South African Gold Krugerrands;
- (2) 81 U.S. Liberty \$50 Gold Coins;
- (3) 320 U.S. Liberty \$1 Silver Coins;
- (4) 61 Canadian \$50 Gold Coins; and

b. records the enterprise identified in the Indictment, including, but not limited to all records reflecting clients or customers of the enterprise named and described in the Indictment and all proceeds traceable to any sale, transfer or other disposition of such materials as may have occurred prior to service of this Order.

3. REAL PROPERTY

a. \$182,529.59 of equity in the Real Property more fully described as:

803 Capitol Street, Vallejo, California 94590, more fully described as:

The North Seventy (70) Feet of Lot Nine (9) in block Three Hundred and Six (306), as the same is shown on the official map of the City of Vallejo, made by E.H. Rowe, C.S., and which map was filed for record in the Office of the County Recorder of Solano County, California, September 19, 1868, in Book 1 of Maps, Page 123; and,

b. Real property more fully described as:

1441 Vaquero Glen, Escondido, California 92026, more fully described as:

Lot 17 of Escondido Tract No. 350 in the City of Escondido, County of San Diego, State of California according to map thereof No. 9034, filed in the Office of the County

Recorder of San Diego County on
November 22, 1978.

IT IS FURTHER ORDERED that any financial institutions holding any accounts subject to this Order shall take no offsets against such accounts. They shall continue to credit any deposits, interest, dividends, or other credits to such accounts in the normal course of business, and such deposits, interest, dividends, and other credits shall be subject to this Order. In addition, upon receiving notice of this Order, each financial institution shall promptly inform the Government as to the account balances at the time of notice, and shall thereafter supplement such information by reporting to the Government any changes to the accounts, and by responding promptly to requests by the Government for information on the accounts' current status.


IT IS FURTHER ORDERED that the United States or any Subject of this Order may seek modifications of this Order if it is deemed necessary by them to preserve their interest in the subject property.

IT IS FURTHER ORDERED that any Subject of this Order shall be permitted to execute a satisfactory performance bond pursuant to 21 U.S.C. § 853(e)(1) as an alternative to the restraint of the subject property. After notice to the United States and an opportunity to be heard, the Court shall determine whether any proposed bond is a satisfactory performance bond.

IT IS FURTHER ORDERED that the United States shall cause a copy of this Restraining Order to be served promptly upon counsel for **DEBORAH JEANE PALFREY**, and all other appropriate individuals and/or financial institutions having an interest in the properties identified herein, and shall make a return thereon reflecting the date and time of service.

THIS RESTRAINING ORDER shall remain in full force and effect until further order of
this Court.

DONE this the 20th day of March, 2007.



GLADYS KESSLER
UNITED STATES DISTRICT JUDGE

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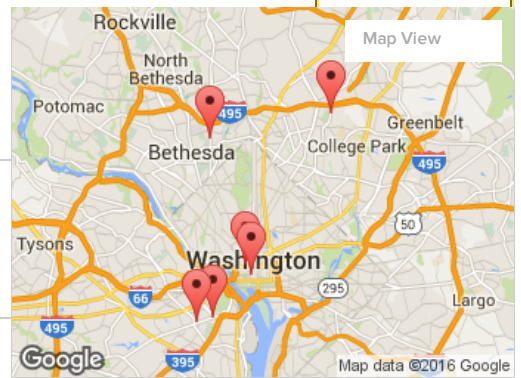
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
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
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