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October 4, 2018

VIA ELECTRONIC MAIL

Honorable Christopher A. Wray
Director, Federal Bureau of Investigation
c/o Dana Boente, General Counsel
935 Pennsylvania Avenue, N.W.
Washington, D.C. 20535

Dear Director Wray:

My firm represents Deborah Ramirez, as does the law firm of Hutchinson Black and Cook, LLC. As you likely know, a reporter recently reached out to Ms. Ramirez to ask about an incident involving Brett Kavanaugh, President Trump's nominee for the United States Supreme Court. Ms. Ramirez answered the reporter's questions, and he, after interviewing a number of additional witnesses, wrote a story: <https://www.newyorker.com/news/news-desk/senate-democrats-investigate-a-new-allegation-of-sexual-misconduct-from-the-supreme-court-nominee-brett-kavanaughs-college-years-deborah-ramirez>.

As you likely also are aware, two of your agents met with Ms. Ramirez this past Sunday, September 30, 2018, in Colorado. Ms. Ramirez spoke with the agents for approximately two hours, answering a host of detailed questions. Ms. Ramirez offered credible and compelling information—as everyone in the room would acknowledge.

Later that day, Ms. Ramirez, through counsel, provided the FBI with a list of more than twenty additional witnesses likely to have relevant information. Ms. Ramirez suspected that a number of those individuals could corroborate her account of Mr. Kavanaugh's behavior.

Fewer than four days later, however, the FBI apparently has concluded its investigation—without permitting its agents to investigate. We are deeply disappointed by this failure. We can only conclude that the FBI—or those controlling its investigation—did not want to learn the truth behind Ms. Ramirez's allegations.

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We know this much, however: If your agents had been permitted to investigate Ms. Ramirez's allegations, they would have uncovered substantial corroboration. Just last night, *The New Yorker* published a new article: <https://www.newyorker.com/news/news-desk/will-the-fbi-ignore-testimonies-from-kavanaugh-former-classmates>. That article highlights Dr. Kenneth Appold, a professor at the Princeton Theological Seminary. The article reports that, at the time of the relevant incident, Dr. Appold was a Yale undergraduate, a resident of the relevant dormitory (Lawrence Hall), and a suitemate of Mr. Kavanaugh. The article further reports that Dr. Appold has confirmed that, shortly after the relevant incident occurred, he learned of it, including that Ms. Ramirez was the victim and Mr. Kavanaugh the perpetrator. Dr. Appold is one of the witnesses that Ms. Ramirez had suggested that the FBI contact; the FBI never did.

Dr. Appold apparently himself recounted this incident, years ago, to another individual, Michael Wetstone. *The New Yorker* article cited immediately above reports that Mr. Wetstone has confirmed that Dr. Appold in fact relayed the story in late 1980s or early 1990s. Mr. Wetstone is another of the witnesses that Ms. Ramirez had suggested that the FBI contact; the FBI apparently never did.

If your agents had been permitted to investigate, they would have uncovered still more corroboration:

Dr. Richard Oh is an emergency room doctor in Santa Clara, California. He attended Yale for his undergraduate studies, between 1983 and 1987, i.e., at the same time as Ms. Ramirez and Mr. Kavanaugh. He recalls, during his freshman year at Yale, a female student "emotionally reporting" what can only have been the same incident as described by Ms. Ramirez. *See Decl. of Dr. Richard Oh (Oct. 3, 2018), attached.* Dr. Oh is another of the witnesses that Ms. Ramirez had suggested that the FBI contact; the FBI never did.

There may be many additional witnesses who could offer still further corroboration (if any additional corroboration were needed, which it is not). But we likely never will know, given that your agents were barred from investigating. What we do know, despite that lack of investigation, is that multiple witnesses have corroborated Ms. Ramirez's allegations. Respectfully, your agents should have been permitted to develop that information.

Sincerely,



William Pittard

Enclosure: As stated

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cc: Hon. Mitch McConnell, Majority Leader (*via hand delivery*)
Hon. Charles E. Schumer, Minority Leader (*via hand delivery*)
Hon. Chuck Grassley, Chairman, Committee on the Judiciary (*via hand delivery*)
Hon. Dianne Feinstein, Ranking Member, Committee on the Judiciary (*via hand delivery*)
John C. Clune, Esquire (*via electronic mail*)

DECLARATION OF DR. RICHARD OH

I, Richard Oh, hereby state I am over eighteen (18) years of age, am competent to testify, and have personal knowledge of the following facts:

1. I have a Bachelor of Science (B.S.) degree from Yale University (New Haven, CT) where I was an undergraduate student from 1983 to 1987. I have a Medical Doctor (M.D.) degree from Stanford University (Palo Alto, CA) that I received in 1994.

2. I am currently employed as an Emergency Room ("ER") Doctor in Santa Clara, CA.

3. During my freshman year at Yale, I resided in Lawrance Hall in a four bedroom suite which had its own living room. I recall a social gathering in our living room, where several Yale students were discussing a recent party they had attended. One female student emotionally reported that while the students at the party were inebriated, what she initially thought was a plastic penis was exhibited, but she later realized it was a male student's exposed penis. She reported that the female student, in trying to push the exposed penis away from herself, made physical contact with the exposed penis. She told the others, in my living room, that she was very upset by the incident and thought it very inappropriate.

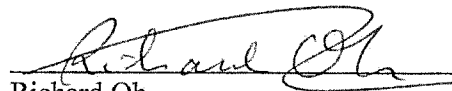
4. Both Deborah Ramirez and Brett Kavanaugh were freshman at Yale at this time and I was acquainted with both of them. Debbie lived in another residence hall on campus. Brett lived in Lawrance Hall on another floor.

5. On or about September 18-19, 2018, I reported what I knew about the above incident to Jane Mayer of the New Yorker. I told her how I had independently heard the story about the drinking party incident as described above.

6. On both September 29 and 30, 2018, I contacted the FBI to inform them that I was willing to be interviewed as part of the Kavanaugh investigation. To date, no one from the FBI has attempted to interview me or to even schedule an interview.

I solemnly swear or affirm under penalty of perjury that the matters set forth in this Declaration are true and correct to the best of my personal knowledge, information, and belief.

Executed in this 3rd day of October, 2018, in Oakland, CA.


Richard Oh