

The objects of the relief Mr. Knowlton seeks¹ are the same as those of our Ethics in Government Act² -- to ensure that (1) justice is done, (2) justice appears to have been done, (3) those named in a Report are afforded a measure of fairness, (4) reports are full and complete, and (5) the Independent Counsel is accountable.

¹ See pp. 2-4 of Motions of Patrick Knowlton, filed herewith: (1) For Leave to Amend Comments and Factual Information included in the Appendix to the OIC's Interim Report on the Death of Vincent Foster... (2) Unseal Comments and Factual Information Proposed to be an Appendix to the OIC's Report & (3) Compel the OIC to produce his grand jury minutes:

Patrick Knowlton respectfully prays that the Court grant him leave to amend the Comments and Factual Information, attached as an appendix to the OIC's interim Report by Order entered September 26, 1997, and to substitute the enclosed Comments and Factual Information in its place... Because of the extraordinary public importance of the current debate on whether to reenact our Ethics in Government Act, and the need to promptly disseminate the information in the subject filing to the American people, movant respectfully requests that the Court consider the motion to unseal his filing on an expedited basis...

Summary of argument: ...The OIC's reliance on § 594 in filing its interim, as opposed to a "final," Report, was in error. The OIC's interim Report is unknown to the Act and this Court therefore need adjudicate movant's rights under the Act. *** Patrick Knowlton [also] respectfully moves the Court to unseal his proposed comments and factual information. The common law, the First Amendment to the Constitution, and the traditional practice of this Court support the relief requested. Personal privacy interest in non-disclosure, if any, is outweighed by the public interest in the administration of justice. The Act specifically authorizes this Court to unseal... *** A grand jury witness has a general right to the transcript of his own grand jury testimony when sought in connection with a judicial proceeding.

² The Ethics in Government Act of 1978, 28 U.S.C. §§ 591-599 (1994) [hereinafter also the "Ethics in Government Act," the "Independent Counsel Statute," or "the Act"].

Summary of Contents

Preface.....	4
Table of Contents.....	25
I. BACKGROUND.....	28
II. AUTHORITIES ARRIVE AT THE SCENE.....	73
III. OVERVIEW OF THE COMPARISON OF THE PUBLICLY AVAILABLE EVIDENCE TO THE OIC'S REPORT.....	115
IV. EVIDENCE OF KNOWLEDGE OF THE DEATH BEFORE THE OFFICIAL TIME OF NOTIFICATION.....	118
V. EVIDENCE THAT THE OIC CONCEALED THE DISAPPEARANCE OF PHOTOGRAPHS.....	127
VI. EVIDENCE THAT THE OIC COVERED UP THE ABSENCE OF THE OFFICIAL MOUTH ENTRANCE WOUND & HEAD EXIT WOUND, AND THE EXISTENCE OF A NECK WOUND.....	151
VII. EVIDENCE THAT THE OIC COVERED UP THAT MR. FOSTER DID NOT FIRE OR OWN THE GUN FOUND AT THE PARK.....	245
VIII. EVIDENCE CONTRADICTING THE OFFICIAL CLAIM THAT MR. FOSTER DROVE TO THE PARK.....	285
IX. OTHER ANOMALIES.....	358
X. INFERENCES TO BE DRAWN FROM THE FACTS.....	373
XI. STATE OF MIND.....	394
XII. INVESTIGATIVE HISTORY.....	416
XIII. CONCLUSION.....	435
Endnotes.....	456