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9 UNITED STATES DISTRICT COURT
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA
11 WESTERN DIVISION

12 ALLAN J. FAVISH,) No. CV 97-1479-WDK(Ex)
13)
Plaintiff,)
14) NOTICE OF FILING AND
v.) FILING OF FACSIMILE
15) OF DECLARATION OF
OFFICE OF THE INDEPENDENT COUNSEL,) SHEILA FOSTER ANTHONY
16)
Defendant.)
17)

18
19 Please take notice that attached for filing is the
20 Declaration (facsimile) of Sheila Foster Anthony filed in support
21 of defendant's motion for summary judgment and in opposition to
22 plaintiff's motion for summary adjudication of fact. The original
23 will be filed upon receipt.

24 DATED: This 5th day of March, 1998.

25 NORA M. MANELLA
United States Attorney

26 *Jan L. Luymes*
27 JAN L. LUYMES
Assistant United States Attorney
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28

for world consumption. Once again my family would be the focus of conceivably unsavory and distasteful media coverage. I cannot adequately express how truly unjust, unfair and cruel it would be to subject my family to more public scrutiny and the dissemination of these photographs via the Internet or by other print and electronic means. No member of any family should ever be concerned with the possible public exposure of photographs of this nature.

The death of my brother has been more than adequately investigated. Five separate government inquiries have determined that Vince's death was a result of a self-inflicted gun wound. Therefore, I cannot fathom a legitimate or rational reason why the photographs should be released. The mere suggestion that these photographs would be released is unconscionable. The release of these photographs would only bring more agony to members of my family.

We have endured enough pain and personal invasion by the media and by those who investigated the death of my brother. While I have tried here, I cannot adequately express the anguish the release of these photographs would bring to me and the entire Foster family.

The Court has been asked by the Government to uphold its position that the release of the photographs would be an unwarranted invasion of my personal privacy and that of Vince's family. I implore the Court to do all it can to protect Vince's family, but particularly his children and his 83 year old mother, from further invasion and the distressing events that surely would result from the release of the photographs.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: This 5, day of March, 1998.


SHEILA FOSTER ANTHONY

