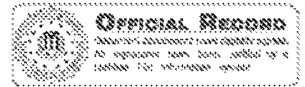


EXHIBIT 61

to the

**THE GAWKER DEFENDANTS' MOTION TO DISMISS
ON THE GROUNDS OF FRAUD ON THE COURT**



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FEDERAL BUREAU OF INVESTIGATION

Date of entry 12/11/2012

[redacted] w/f, date of birth (DOB) [redacted] home address [redacted]
[redacted] Tampa, FL, cell phone number [redacted]
SSAN [redacted] was interviewed at the Sand Pearl Resort on Clearwater Beach, FL. After being advised of the identity of the interviewing Agents and the nature of the interview, [redacted] provided the following information:

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[redacted] initially questioned interviewing Agents on multiple occasions whether she was part of a hoax or "on camera." Interviewing Agents explained to [redacted] that FBI Agents had monitored the meeting that she was a part of and that it was not a hoax, rather interviewing Agents would like the opportunity to conduct an interview with [redacted]. Further, interviewing Agents presented their credentials two times to [redacted] to prove their identities.

[redacted] then questioned why her rights had not been read to her. Writer explained that she was free to leave the interview at any time and therefore it was not necessary to read [redacted] her rights. However, since she asked for them to be read, SA [redacted] read [redacted] her rights and she signed the FD-395 and stated she wanted to cooperate and agreed to speak with interviewing Agents. Note - The FD-395 will be placed in a 1A in the case file.

b6 -1, 2
b7C -1, 2

[redacted] began by stating that the most important thing to interviewing Agents as well as to TERRY BOLLEA was that she and [redacted] were not responsible for the GAWKER sex tape leak. [redacted] then provided the identity of [redacted] as [redacted] (aka [redacted] was instructed by [redacted] and her attorney KEITH DAVIDSON to say that she and [redacted] were the ones that leaked the clip to GAWKER in order to complete the negotiations with BOLLEA and his attorney.

[redacted] was asked to elaborate on how [redacted] came into possession and subsequently was attempting to sell the sex tapes. [redacted] is unsure of how [redacted] came in possession of the TERRY BOLLEA sex tapes. [redacted] "BUBBA".

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Investigation on 12/14/2012 at Clearwater, Florida, United States (In Person)

File # 9B-TP-2534791 Date drafted 12/11/2012

by Jason R. Shearn, [redacted]

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Continuation of FD-302 of Interview of [REDACTED], On 12/14/2012, Page 2 of 6

[REDACTED] is [REDACTED] and the two went to high school together. [REDACTED] who is [REDACTED] has been with [REDACTED] for approximately three to four years.

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[REDACTED] advised that [REDACTED] leaked some initial material to include still frames of BOLLEA engaged in sex acts with HEATHER CLEM ("H. CLEM") to THEDIRTY.COM. [REDACTED] has never seen the still frame images on THEDIRTY.COM. [REDACTED] explained when this initial material was leaked, there was not much talk or buzz around it within the media. [REDACTED] who possessed the tapes, contacted TMZ who put him in touch with attorney KEITH DAVIDSON. Around the same time, a clip of the sex tapes was leaked to GAWKER. At this time, [REDACTED] realized that there were other tapes out there and he was going to get a lower value for them, so he needed to do something quickly.

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[REDACTED] advised [REDACTED] had DAVIDSON involved on the sale of the tapes when he went to TMZ and leaked a clip to them. [REDACTED] was contacted by [REDACTED] who asked if she had been watching the news or listening to the radio. [REDACTED] stated she had not, and [REDACTED] explained to her that [REDACTED] had possessed the BOLLEA sex tapes and was actively trying to sell them. [REDACTED] was asked if she wanted to become involved to finalize the deal and for her part was to make \$10,000.

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[REDACTED] was questioned who leaked the tapes to GAWKER if it was not [REDACTED] stated neither she, nor [REDACTED] knew who leaked them to GAWKER, however, [REDACTED] BUBBA, BUBBA would show the tapes around the office.

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b7C -2

Writer questioned [REDACTED] whether she was involved with [REDACTED] and [REDACTED] when GAWKER leaked the clip on 10/3/2012. [REDACTED] stated she did not have any knowledge of the leak, nor had she been contacted by [REDACTED] or [REDACTED]. When she did become involved, [REDACTED] asked [REDACTED] how the selling of the sex tapes was not considered extortion. [REDACTED] responded that [REDACTED] were involved so it was not extortion.

The first time [REDACTED] had a conversation with DAVIDSON was on Veteran's Day, 2012, when [REDACTED] went to [REDACTED] and [REDACTED] house for the purpose of having a conference call with DAVIDSON. During the conference call, [REDACTED] asked DAVIDSON if the selling of the tapes was extortion. DAVIDSON responded that he had previously done this type of deal

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Continuation of FD-302 of Interview of [REDACTED], On 12/14/2012, Page 3 of 6

several times. Further, the tapes were purchased and property that is purchased can be sold. Therefore, they were able to sell the property and it would not be extortion.

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b7C -2

Writer asked [REDACTED] why she thought to ask whether the sex tape sale was extortion. [REDACTED] stated she asked because [REDACTED] and [REDACTED] had something that could hurt BOLLEA and they were trying to get that BOLLEA to pay for it. [REDACTED] further stated that's what she understood extortion to be.

[REDACTED] initially told [REDACTED] that DAVIDSON could not technically tell them to lie about leaking the sex tape to GAWKER. However, [REDACTED] explained to [REDACTED] that DAVIDSON had a way with words and further, if they did not say they released the clip to GAWKER the sex tapes would lose their value.

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b7C -2

[REDACTED] stated that [REDACTED] was confident that he possessed the original sex tapes. During the Veteran's Day meeting, [REDACTED] and [REDACTED] had [REDACTED] watch all three tapes so that she would be familiar with them during the settlement negotiation meeting. [REDACTED] confirmed that BOLLEA used the "N-word" during one of the tapes. Further, [REDACTED] stated to [REDACTED] that BOLLEA got a "bad hand" with the sex tapes and because of that, he would negotiate directly with him rather than with someone else.

[REDACTED] advised that on 12/11/2012, [REDACTED] and [REDACTED] visited [REDACTED] place of employment and reviewed the final settlement statement step by step relating to the BOLLEA sex tapes with her. [REDACTED] advised that both [REDACTED] and [REDACTED] were involved with this process. Further, [REDACTED] stated that she and [REDACTED] went over the fact she would be stating that [REDACTED] meaning [REDACTED] provided the clip to GAWKER. [REDACTED] stated this was important as BOLLEA's attorney asked about the GAWKER clip several times and that BOLLEA had a lawsuit on GAWKER.

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[REDACTED] went to dinner at Ceviche restaurant in St. Petersburg, FL with [REDACTED] and DAVIDSON on [REDACTED] prior to the settlement meeting. At dinner, DAVIDSON explained that there were other deals similar to the BOLLEA tapes he was handling to include a deal he just did for [REDACTED] and other celebrities. [REDACTED] stated that DAVIDSON seemed to brag about all of the deals he had done like the BOLLEA deal. DAVIDSON also stated not to worry because he did this thing all of the time.

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b7C -2

Writer asked why [REDACTED] would assume the risk of the deal knowing that someone else leaked the tapes to GAWKER and could do so again. [REDACTED] stated DAVIDSON had told her that BOLLEA and his attorney would have to prove that [REDACTED] leaked anything in order to hold her liable

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Continuation of FD-302 of Interview of [REDACTED], On 12/14/2012, Page 4 of 6

[REDACTED] for a breach of the contract. [REDACTED] did not believe BOLLEA would be able to do so.

[REDACTED] stated her fear in getting involved in the matter was not law enforcement, rather the physical, mental and emotional strain that could be put on her if her name was known to BOLLEA and others in the deal.

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[REDACTED] further stated she was willing to take the possibility of breaching the contract but was not willing to take "this" (pointing at interviewing Agents) for [REDACTED] and [REDACTED]

In preparation for the 12/14/2012 settlement meeting, [REDACTED] had [REDACTED] rent a car which he gave her \$200 for. [REDACTED] stated that the rental car was so that no one could follow her after the meeting. Although she rented the car from a location near her house, [REDACTED] was to meet [REDACTED] at the airport rental car office to make it look like she was going to board a plane following the settlement meeting. [REDACTED] was to pick [REDACTED] up and drive her to her personal car which had recently been repossessed. [REDACTED] was to receive \$5,000 as partial payment for her involvement which was to go to pay for her repossessed car. The \$5,000 was to come from [REDACTED] who was to withdraw the money the morning of 12/14/2012.

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According to [REDACTED] DAVIDSON advised [REDACTED] that it would not benefit them if BOLLEA knew that someone else had leaked the clip to GAWKER. [REDACTED] told [REDACTED] to lie about the GAWKER clip. On the morning of 12/14/2012, [REDACTED] was in DAVIDSON's hotel room in the [REDACTED] resort. In preparation for the meeting, DAVIDSON instructed [REDACTED] that she had bought a computer bag which contained the BOLLEA sex tapes. [REDACTED] further stated this was said in a "wink wink, nudge nudge" fashion. When DAVIDSON returned to the room, he stated that BOLLEA and his attorney knew there was someone else involved and they would need to use [REDACTED] to describe that person as his identity was not to be revealed. [REDACTED] stated this was a relief to her as she was uncomfortable lying about purchasing the tapes.

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b7C -2

[REDACTED] was asked whether [REDACTED] had any premonitions about the sex tape negotiations throughout the process. [REDACTED] stated the only thing she was aware of was that [REDACTED] consulted with an attorney named [REDACTED] LNU about possibly doing an agreement between he and [REDACTED] so that she would not steal the money or tapes.

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b7C -2

Toward the end of the interview, Writer asked if she was aware of additional leaks that [REDACTED] was involved in relating to the sex tapes. [REDACTED] stated [REDACTED] leaked a clip to TMZ and was paid between \$8,500 and \$8,600 for it. So that he would remain anonymous, [REDACTED] had [REDACTED] sign the tax form for the money and was told [REDACTED] and [REDACTED] would help her with the taxes on the income. [REDACTED] was sent via FedEx, a TMZ check

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Continuation of FD-302 of Interview of [REDACTED], On 12/14/2012, Page 5 of 6

[REDACTED] that she deposited into her [REDACTED] account. Once the money was in her account, [REDACTED] got an [REDACTED] cashier's check made out to [REDACTED] who had already borrowed \$100 from [REDACTED] made an additional \$400 for a total of \$500 for her end of the deal. [REDACTED] destroyed the invoice that was attached to the TMZ check as she did not want anything like that laying around.

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[REDACTED] believes TMZ ran the clip but may have taken it down. Further, she believes [REDACTED] has other tapes with additional celebrities engaged in sex acts with H. CLEM and leaked that information to TMZ and GAWKER. [REDACTED] has never seen additional tapes.

[REDACTED] is aware of [REDACTED] using a name like [REDACTED] when dealing with the media sites. Writer asked if she had heard of the name [REDACTED] which GAWKER stated they had received information from. [REDACTED] acknowledged [REDACTED] was the name [REDACTED] used with GAWKER and other media sites. [REDACTED] questioned [REDACTED] where the name [REDACTED] came from. [REDACTED] stated he had made it up. [REDACTED] and [REDACTED] set up multiple fake e-mail accounts, potentially from Gmail to converse and deal with the media sites. Once the e-mail accounts were used, [REDACTED] and [REDACTED] would shut them down immediately so they could not be traced. [REDACTED] does not know any of the e-mail accounts, but does know [REDACTED] used one of the fake e-mail accounts to leak the clip to TMZ.

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[REDACTED] stated that she had nothing to do with any of the leaks to media sites of the sex tapes to include GAWKER and TMZ. Further, she acknowledged during the meeting that she represented that she and [REDACTED] leaked the clip to GAWKER together. [REDACTED] stated this was a lie.

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b7C -2

[REDACTED] advised BUBBA does not have anything to do with the sex tape leak or sale. Further, [REDACTED] is afraid of BUBBA and is afraid of him finding out he was selling the tapes.

[REDACTED] stated she wished she was able to say that her best friend [REDACTED] was not involved in the matter. However, [REDACTED] was involved from the beginning when she called [REDACTED] to tell her that they had the tapes, leaked a clip to TMZ and were looking to figure out what to do next.

[REDACTED] advised [REDACTED] was going to use the money he was to make on the sale of the sex tapes to pay a chunk of his home mortgage. The deal was a 60/40 split between [REDACTED] and DAVIDSON with the higher percentage going to DAVIDSON. [REDACTED] signed a form the morning she met with DAVIDSON that also showed a 60/40 split.

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[REDACTED] advised that [REDACTED] shopped the BOLLEA sex tapes to a sex website. [REDACTED] was told in order for him to sell the tapes, he would need

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Continuation of FD-302 of Interview of [REDACTED], On 12/14/2012, Page 6 of 6

BOLLEA's copyright in the tapes. [REDACTED] then stated that [REDACTED] likes BOLLEA and that he wanted to sell them directly to him. When questioned why he would try to shop them around, [REDACTED] stated he was using the shopping as a comparison to get a market for the value of the tapes.

[REDACTED] advised [REDACTED] works at the [REDACTED] telephone number is [REDACTED] believes [REDACTED] lives at [REDACTED] or in [REDACTED] phone number is [REDACTED] had texted DAVIDSON's phone number to [REDACTED] which she provided as [REDACTED]

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[REDACTED] signed an FD-39 consent to search form which for the settlement check, signed contract and three DVDs in a case. [REDACTED] also agreed to waive any legal rights to the above mentioned property which was written onto the form. The FD-39 will be kept in a 1A in the case file.

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