

# KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | 63<sup>RD</sup> FLOOR  
NEW YORK, NEW YORK 10118

1050 K STREET NW | SUITE 1040  
WASHINGTON, DC 20001

TEL (212) 763-0883 | FAX (212) 564-0883

WWW.KAPLANHECKER.COM

DIRECT DIAL 212.763.0883

DIRECT EMAIL rkaplan@kaplanhecker.com

April 8, 2024

**BY CM/ECF**

The Honorable Laura Taylor Swain  
Chief United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

*Re: USA v. Aimee Harris, 22-cr-00457 (LTS)*

Dear Chief Judge Swain:

In connection with the sentencing of Ms. Harris scheduled for tomorrow, enclosed please find a letter from our client, Ashley B. Biden.

Respectfully submitted,



Roberta A. Kaplan

cc: Mike Ferrara  
Shawn G. Crowley

April 8, 2024

Dear Chief Judge Swain,

I am deeply saddened that I even have to write this letter because my personal private journal was stolen and sold for profit. The point of the theft, I assume, was to be able to peddle grotesque lies by distorting my stream-of-consciousness thoughts. The reason I have decided to not attend tomorrow's sentencing in person is because it would only increase my pain. Nonetheless, I write to ask Your Honor to sentence the defendant to time in prison.

The defendant's actions constitute one of the most heinous forms of bullying, not to mention a complete violation of my privacy and personal dignity. After being the victim of a crime in my early twenties, I developed PTSD. The journal that was stolen was part of my efforts to heal. I am a private citizen, targeted only because my father happened to be running to be President. In other words, the extensive work I have done to move past my trauma was undone by Ms. Harris's actions. The defendant's actions have created a constant environment of anxiety, fear, and intimidation in which my innermost thoughts are constantly distorted and manipulated.

Although this criminal act happened more than three years ago, because of the publicity it drew—exactly as Ms. Harris intended—I am constantly re-traumatized by it. I will forever have to deal with the fact that my personal journal can be viewed online. Repeatedly, I hear others grossly misinterpret my once-private writings and lob false accusations that defame my character and those of the people I love. Her actions were not only re-traumatizing to me, but constituted a horrific trauma in and of themselves. This ongoing harm is a direct result of Ms. Harris's intentional actions.

I ask Your Honor to sentence Ms. Harris to time in prison followed by lengthy probation. She should be held accountable for what she has done. Not only did she demonstrate a complete lack of morality, but she lacks any respect for the rule of law as well. Among other things, she has failed to appear in court 12 times.

My goal in asking Your Honor to impose a term of incarceration is to ensure that another woman isn't bullied and shamed like this ever again. The despair I have often felt will never truly go away. But I ask Your Honor to hold Ms. Harris accountable so that she thinks twice before doing it to someone else. I have spent much of my life trying to speak up for those who cannot find their voices. I am fortunate enough to have found mine, and I use it today—and every day—to make sure that bullies are held accountable.

Finally, I worry that a non-incarceratory sentence will send a message—to her and to others like her—that it is okay to violate and exploit others for your own personal gain, regardless of the humiliation and pain it causes. Please send a message that these types of damaging criminal actions will not be tolerated. I thank Your Honor for your consideration.

Respectfully submitted,

/s/ Ashley B. Biden