HILLARY CLINTON'S SECRET EMAIL SCANDAL

A Judicial Watch Special Report

On March 31, 2015, Judicial Watch convened a special panel of leading experts on the Federal Records and Freedom of Information Acts to analyze the growing scandal concerning former Secretary of State Hillary Clinton's secret email accounts. Hosted by Judicial Watch President Tom Fitton, the panel included Daniel J. Metcalfe, founding director of the Justice Department's Office of Information and Privacy; Joseph E. diGenova, former Counsel to the Senate Judiciary, Governmental Affairs and Select Intelligence Committees; and Paul Orfanedes, Director of Litigation for Judicial Watch. In a revealing, often riveting, and wide-ranging discussion, the panel scrutinized actions taken by the former Secretary of State that, in the words of diGenova, "has undermined people's confidence in the ability to get valuable public records."

Left to right, panelists for this report included Joseph E. diGenova, Founding Partner of diGenova & Toensing, LLP; Daniel J. Metcalfe, Adjunct Professor of Law, American University; Paul Orfanedes, Director of Litigation, Judicial Watch; Tom Fitton, President, Judicial Watch.

Introduction by Tom Fitton, Judicial Watch President

Welcome to our panel discussion on "Hillary Clinton's Secret Email Scandal." I am Tom Fitton, president of Judicial Watch.

Judicial Watch is a conservative, nonpartisan educational foundation dedicated to transparency, integrity, and accountability in government, politics, and the law. Through educational activities, we advocate high standards of ethics and morality in our nation's public life and seek to ensure that political and judicial officials do not abuse the powers entrusted to them by the American people. We strongly believe in the rule of law, and to that end, a government that adheres to the limits imposed upon it by the Constitution.

Our panel today is designed to educate you about the facts and legal issues behind the revelations that Hillary Clinton, immediately upon becoming Secretary of State, created a secret email account, or accounts, to conduct all of her government business, and the public did not know about this … until earlier this month.

At Judicial Watch we have seen this story before. During the Clinton administration, we were told by a White House whistleblower that some 1.8

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million emails were not being managed properly in the White House and were not being searched in response to subpoenas and document requests. (Our requests for information at that time were focused on the mishandling of FBI files by Hillary Clinton and the White House.)

The Office of Independent Counsel investigations were particularly impacted by the failure to look at those records; and it turned into a big mess, for when the problem was raised with White House officials, those expressing concern were told that if they mentioned it to anyone, they would lose their jobs and go to jail.

Ultimately, we had a months-long hearing on obstruction of justice before a federal court judge, the honorable Royce Lamberth. Testimony included that of White House officials John Podesta, who was then chief of staff; Charles Ruff, who is now deceased, but was then White House counsel; and Cheryl Mills, who was a deputy counsel in the White House and later became [and still is] Chief of Staff to Mrs. Clinton in the State Department.

Though the court did not rule that there had been an obstruction of justice, Judge Lamberth called Ms. Mills' participation in the matter "loathsome." He further stated that "Mills was responsible for the most critical error made in this entire fiasco," and that her actions "were totally inadequate in addressing the problem." So as far back as the Clinton administration, there has been an email scandal.

During the current administration, Judicial Watch has been very active in employing the Freedom of Information Act (FOIA). We have filed more than 160 FOIA requests with the State Department and we have sued approximately 20 times under the Freedom of Information Act on issues ranging from Mrs. Clinton's ability to raise money through her husband and her husband's potential conflicts of interest with regard to the State Department.

We reported — exclusively at first with the *Washington Examiner* — on the money she was raising and the conflict-of-interest checks that were not being done. While she was at the State Department, Bill Clinton was able to glean some $48 million, as I recall, from virtually everyone who wanted to gain influence with this administration or with the putative successor to President Obama. That litigation, by the way, is ongoing.

We have also been involved in extensive litigation over the Benghazi scandal. Mrs. Clinton, along with President Obama and Susan Rice, her employee and then Ambassador to the United Nations, had notoriously promulgated the fake talking points, which blamed the Benghazi attack on a spontaneous demonstration caused by people upset by an Internet video no one had seen. Despite all the evidence to the contrary, they continued to push this claim, though they knew it to be false. It was designed, in my view, to help two presidential campaigns: Obama's reelection, and Hillary Clinton's nascent presidential campaign.

Our document requests and subsequent FOIA lawsuits did much to uncover facts about Benghazi, about the security mess there, and about the intelligence that the administration and Mrs. Clinton and the State Department was actually getting, as opposed to the intelligence they pretended they were getting. The intelligence she was

getting showed that it was an attack, and *she knew it was an attack from the get-go.* That information just came out over the last few weeks as a result of one of our Freedom of Information Act lawsuits.

We had already blown the Benghazi scandal wide open last year. In another lawsuit, we were able to uncover a White House document containing the talking points that Susan Rice employed on five of the Sunday morning talk shows after the attack, in which she attempted to convince viewers that it wasn't a terrorist attack, but instead, a spontaneous demonstration supposedly resulting from the Internet video.

The Obama administration has said, "Well, we're basing these on what the intelligence folks were telling us." But that was not true. The documents we finally got as a result of our FOIA lawsuit show it was the White House that sent out the talking points to those in the administration who were part of the political messaging team. The White House plan was for Susan Rice to follow the talking points in commenting on Benghazi that Sunday.

The bottom line is the White House had not only been lying about what was behind the attack, and was caught in that lie and had to walk it back; but it also had been lying about its involvement in deceiving Americans with misleading information in the midst of the presidential campaign.

Judicial Watch's success in securing the documents under our FOIA lawsuit that five investigative committees of the Congress had not been able to obtain caused Speaker John Boehner to appoint a select committee. But let me say this: When we got those materials from the State Department regarding the White House talking points, we were curious as to why no Hillary Clinton emails turned up. We were wondering if we had missed something …

To be safe, we filed another FOIA request, asking for records from her office about the issue of the White House talking points. Typical for the administration, they didn't respond as they were required to under law, so we had to file again. Then they gave us some of the documents we had been provided previously.

So we asked, "Where did you search and what did you search?" We then heard from the Justice Department in December, essentially telling us there were "some other things" they may need to look at; and, in February, the Justice Department told the court in a filing in that case, "We gave Judicial Watch everything, but there may be other things we need to look at." What Judicial Watch — and the court — was not told is that they hadn't searched Hillary Clinton's email accounts and the email accounts of any other employee that were part of Mrs. Clinton's secret email system.

In the past, we have closed lawsuits based on representations the State Department has made that Hillary Clinton's records had been searched. Not only did the State Department game Judicial Watch, but it also gamed federal courts, which had been assured that a diligent search had been made.

To be clear, Mrs. Clinton began this cover-up the day she came into office, and the seven-year cover-up ended this month. But when you are the head of an agency and you create an email account solely in a secret way, solely to conduct government business, it is

fair to assume you are up to no good. I will defer to the lawyers with us today as to the nature of the violations of law.

Think of the disruptions to Judicial Watch's 20 or so cases in federal court. We have gone to one court asking for another hearing and to a different court to reopen one of the cases that had been shut down; and we are just one litigant. Think of all the litigations the State Department is engaged in every year. Think of all the FOIA requests the administration gets every year, all of which had been distorted and obstructed. Think of the congressional requests for information and subpoenas that the State Department has gotten over the years related to Mrs. Clinton's emails and would have required a search of those records.

In my view, there is significant criminal liability for Mrs. Clinton, if there were an honest Justice Department. Congress is unwilling to enforce its powers to obtain these records and overcome repeated Obama administration obstruction, as is most recently evidenced by Hillary Clinton's email scandal.

Now we see the president himself is taking steps to protect his emails from public disclosure and from questions being asked about them. For 30 years, his Office of Administration had operated as if it were under the Freedom of Information Act. Then George Bush decided he didn't like the questions he was getting about emails, so he asked the court to rule they are no longer covered. The Obama administration continued the Bush argument and was successful at the appellate court in getting that done.

Despite the ruling, the Office of Administration maintained regulations covering FOIAs for another six years. A few days after President Obama disclosed he had communicated with Mrs. Clinton on her secret email account, however, the Office of Administration general counsel issued a directive tearing up the FOIA regulations that "may or may not apply" to the Office of Administration.

We need to recognize this is a scandal not just about Mrs. Clinton. It is a scandal about the State Department. It is a scandal about the Justice Department and about the Obama White House.

Why is the Office of Administration important? Because that would be the agency under the Freedom of Information Act you would be asking questions about in terms of how White House emails were being maintained and organized. So the administration cut off any possibility of questions being asked under a FOIA about the way President Obama kept his emails.

We need to recognize this is a scandal not just about Mrs. Clinton. It is a scandal about the State Department. It is a scandal about the Justice Department and about the Obama White House. It is a scandal about the failures of Congress to conduct effective oversight. It is also a scandal about the lack of interest by the media and by government institutions charged with enforcing the law in making sure there is at least enough of an element of accountability that a Secretary of State would not dare to do what Mrs. Clinton has done.

With that background, I am going to turn the discussion over to our guests. We are fortunate to have a former FOIA official with us today who has been in the Justice Department for many years and is as influential in setting up FOIA systems as anyone living today. We are joined as well by a former prosecutor, an independent counsel, someone who knows what it is like to ferret through arguments and maneuvering by the

prosecution and overcome obstructions. We also have our Judicial Watch counsel with us, who is probably the number one FOIA litigator in the country.

First of all, however, I am pleased to introduce you to Dan Metcalfe, (https://www.wcl.american.edu/faculty/metcalfe), who will lead off. Dan joined the faculty of American University's Washington College of Law in 2007 as a faculty fellow in law and government. Retired from a career in government service that began at the Department of Justice more than 43 years ago, Dan now heads the Collaboration on Government Secrecy for the AU law school; a non-partisan educational project devoted to openness in government, freedom of information, government transparency, and a study of government secrecy in the United States and internationally.

For more than 25 years, Dan served as founding director of the Justice Department's Office of Information and Privacy, where he guided all federal agencies on the interpretation and government-wide administration of the Freedom of Information Act and supervised the defense of more than 500 FOIA and Privacy Act lawsuits in district and appellate courts.

Dan also served as an advisor for numerous other government agencies, including DHS [Department of Homeland Security], the Office of Director of National Intelligence, and the National Security Council. He testified on behalf of the Collaboration on Government Secrecy before the House Committee on Oversight and Government Reform and the Senate Judiciary Committee. We are fortunate to have Dan share his expertise with us.

Also joining us is Joe diGenova (www.digenovatoensing.com) who is a founding partner of the Washington, DC law firm of diGenova & Toensing, which represents individuals, corporations and other entities before the federal courts, Congress, U.S. cabinet departments and agencies on criminal and civil administrative investigative matters. He and his wife, Victoria, who is an attorney in the firm, have done great work — often *pro bono* — on behalf of government whistleblowers.

Joe possesses extensive experience, both as a litigator and investigator, having served as a U.S. attorney for the District of Columbia, where he managed more than 400 federal attorneys, and as an independent counsel in the Clinton passport file search matter.

In 1997, the U.S. House of Representatives named him special counsel on the Independent Review Board for the International Brotherhood of Teamsters; and 10 years later, he was retained by the state of New York to investigate then Governor Eliot Spitzer in the "Troopergate" matter. Joe also has extensive experience on Capitol Hill, having served as chief counsel and staff director of the Senate Rules Committee and Counsel to the Senate Judiciary, Governmental Affairs and Select Intelligence Committees. We are fortunate to have Joe's expertise in matters of investigations and prosecutions and in issues of government corruption.

Paul Orfanedes (http://www.judicialwatch.org/about/board-of-directors/) heads Judicial Watch's litigation department and has been with Judicial Watch since its inception. Paul is a distinguished civil litigator and has argued in front of the Supreme Court and in multiple federal appeals courts on behalf of Judicial Watch and its clients.

As a director of litigation, he has been an effective spokesman for Judicial Watch as well, with his legal commentary appearing in major media and print publications, and he is responsible for managing Judicial Watch's legal department.

Paul is a member of the board of directors of Judicial Watch, and without his legal expertise, Judicial Watch would not have the successes we have today. Paul graduated from the University of Illinois at Urbana Champaign in 1986 and received his J.D. from American University in 1990.

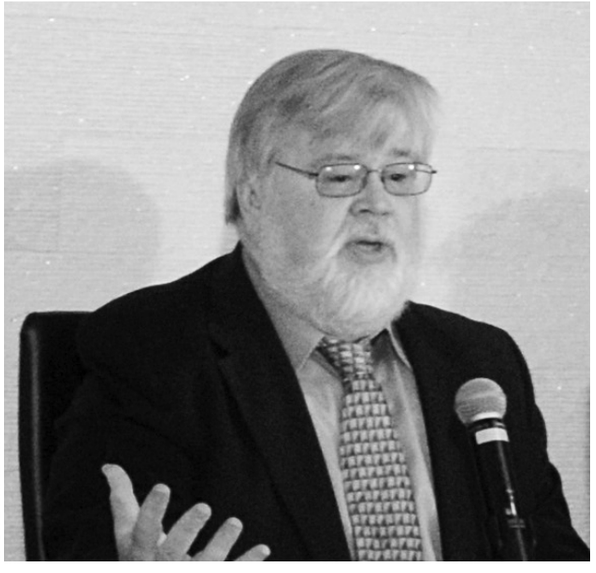
Introductory Comments by Panelists

Daniel Metcalfe. Thank you, Tom. I should say three things preliminarily. The first is that I became involved in analyzing this current fact pattern with respect to Secretary Clinton at the request of some journalists who had participated in my academic programs over the years.

The second is that the expertise I have is under the Freedom of Information Act. I know a good deal about the Federal Records Act, but I don't claim to have any expertise whatsoever with respect to criminal law and whether something is a violation of law or illegal in the way that the average person on the street thinks of those words. So when I talk about something being unlawful or in violation of law, I am speaking about civil statutes, not criminal statutes, for which there could be a criminal sanction. I will defer to former U.S. Attorney diGenova with respect to that aspect of the law.

My third initial comment is that I am going to base my remarks heavily – if not exclusively — on what has been admitted either by Secretary Clinton publicly at a press conference on March 10th or on her behalf by her counsel and her office and statements that have been issued.

There are at least four time junctures involved here: one, when she began in 2009 as Secretary of State; two, when she departed four years later in 2013; and three, when she did whatever she did in 2014 in response to the request that came from the State Department. Four is currently what she is saying, or not saying, at her press conferences and in any other remarks that are made on her behalf.



Daniel Metcalfe

At the outset, in January 2009, she would have had, as a new secretary of a cabinet agency a briefing with the top administrative people at her agency. Very likely, although I don't know this for certain, she would have met with the Undersecretary for Management at the State Department and perhaps others. They would have covered the basic "do's and don'ts", the "ins and outs" of administrative things like federal ethics standards, the requirements of the Federal Records Act, the Freedom of Information Act, the Privacy Act, procurement matters, and things like that.

Evidently, out of that meeting or series of communications, she began to use a personal email account exclusively for all of her official business. Doing so, I must say, is atypical, because the rule under the Federal Records Act and the longstanding practice under the statute and the National Archives and Records Administration implementing policies and practices is that it is not absolutely prohibited to use a personal email account in the conduct of official business.

If you are a busy Secretary of State and you are responding to crises around the world in the middle of the night and you reach for a device, and it is a personal email account, no one is going to tell you, "Stop; you can't address the problems of the world and represent the United States, because you're holding the wrong piece of equipment in your hand."

Further, the National Archives and Records Administration recognizes that the Federal Records Act, as a practical matter, allows for occasional use of a personal email account under exceptional circumstances. When that is done on an exceptional business, then, the staff assistant, or whoever is designated with that responsibility, is to transmit the communication in the form of electronic mail into the State Department's record keeping system, where it would have been located otherwise.

However, Secretary Clinton says quite clearly that she did not begin to use or ever use an official State Department email account. She used only the personal email account. Moreover, during her tenure, she never took the additional step required, as near as I can tell from the public record, with respect to any of her communications.

Also relevant is that rather than have her personal email account handled through an Internet service provider, such as Google or Yahoo, she made use instead of a private server at her home. What that means is during the four years of her tenure, all of her official communications were outside of the official channels of the State Department, at least at her end as the sender and recipient, and resided purely under her personal control or ownership.

When government officials leave, especially high-level ones, it is commonplace to have special attention paid to them, particularly for purposes of records management and archival activities. I had it, even when I left as a mere career appointee at the ES-5 level. This is done so that a proper delineation is made between what is personal and what is official and within the official category, what is a record and what is a non-record. Some records will need to be preserved for posterity through the archives, and some will not. Apparently that did not take place with regard to Secretary Clinton's communications and files.

Then, in 2014, according to Secretary Clinton and statements that have been made on her behalf, she responded to a special request by the State Department. While what actually happened is a bit fuzzy, she evidently undertook the step of dealing with the emails that were on her personal server. I am going to use round numbers here.

I believe she says there were roughly 60,000 emails — not to be confused with pages; that's a different means of measurement. So there were reportedly somewhere between 60,000 and 62,000 emails, with approximately some 31,000 or so deemed by her to

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be personal in nature. She then supposedly took action with respect to what was on the official side of her delimitation, and that amounted to some 55,000 pages from the roughly 31,000 or so emails.

She produced them not in an electronic form with any metadata that might enable efficient searching for FOIA purposes, but instead sent them in paper form to the State Department, with the rest being destroyed, as she said during her March 10th press conference. Now the question becomes were they were really deleted or were they completely destroyed. She has apparently said, or someone has said to a House committee or subcommittee on her behalf, that the emails deemed personal were "deleted in their entirety."

What this amounts to is a flouting, if not an outright violation, of the Federal Records Act, because the Federal Records Act basically says to all agencies and all federal agency employees, "You have an obligation to take some steps to preserve things for posterity; and you cannot preserve something that doesn't exist to begin with." So the first obligation under the Federal Records Act is to memorialize agency action.

Today, electronic mail is itself the vehicle of agency action. It is not just memorialization; it is one step removed; it is how business is done. Secretary Clinton did not just use her personal email for official business on an exceptional basis; she had no official account at all, which is utterly contrary to the Federal Records Act.

Reportedly, until this surfaced, there had been no contact regarding Secretary Clinton's emails between the State Department and the National Archives under which responsibility for the Federal Records Act falls. I have learned, though, that the National Archives has since sent a formal request to the State Department for a report on "how this all happened." I don't believe there has yet been a response.

Now we come to the Freedom of Information Act. As you know, requests can be made to the State Department under the Freedom of Information Act for emails to and from Senator Clinton

From what I gather, there has been a resounding silence with respect to those requests because they haven't existed in her office or on her official computer. The most that might exist is if Mrs. Clinton had sent an email to someone else in the Department and it is on the recipient's computer; but as a practical matter, that would not be a search viable under the Freedom of Information Act. So that is why I believe she is in blatant violation of the Freedom of Information Act.

I suppose the other ingredient that I should add on top of that is that I know enough to know that Secretary Clinton has indeed knowledge of how the Freedom of Information Act works. I have worked with folks in the White House, including briefly, Cheryl Mills, on related matters. There is no doubt in my mind, based upon my first-hand experience, that she knew full well exactly how it all worked and what she was doing.

I am going to suggest to you that for a moment, you imagine that every official email Secretary Clinton either sent or received during her tenure, including attachments, were piles of paper on this desk. Let us assume there are at least eight piles on this

desk. The first would be the outgoing emails she sent to people in the State Department. They would exist at the State Department at the recipient level, so to speak, and as such, would be subject to FOIA requests that could never be adequately searched for, given the practicalities of trying to figure out what's what in that respect.

AP

Hillary Clinton

The next pile would be communications from other people in the Department, so, in other words, State Department people, piles one and two. The third pile would be people who are federal employees but not at State. She was a little bit fast and loose on that at her press conference. She had it kind of both ways, but she did ultimately acknowledge there were other federal employees at other federal agencies — say the Department of Defense — who were at least recipients, if not senders to her. So that's piles three and four — sender, recipient, federal, non-State.

Then, the next set of piles would be emails to and from people who exchanged correspondence with her who were not feds: State employees, U.N. employees, other people, whatever that would mean. When she had her press conference, she placed emphasis on the fact that the vast majority of her correspondents were within the State Department. Well, what about the vast minority? Those are piles five and six.

Then I am going to suggest that piles seven and eight are what she has determined to be personal,what she sent, and what she received. I don't think anyone doubts or quarrels with the fact that there can be some things that are properly in that category. It is unfortunate that it was on a personal email account that also handled official business, but that is entirely legitimate. There is nothing, per se, suspicious or bad about that, although one could say that if 50 percent of her emails were personal, the communications actually probably took up much less of her time: a quick note to a friend, a hair appointment, etc. How it got to be 50/50 in her case would provide some basis for suspicion right there.

Then, there is the possibility of what I call the mysterious ninth pile. I will leave you with this thought: what would the ninth pile be? What I'm about to tell you, I don't know firsthand. I only know what I have read online, and it is this: it has been reported that her three top aides, especially two of the three — one of them was Cheryl Mills — used either her personal account or their own personal accounts at the State Department — where they communicated with one another. I would suggest that that is a distinct, potential pile that ought to be a matter of distinct focus and concern in this case.

Let me say this by way of a concluding statement. I have no axe to grind with respect to Hillary Clinton. I am a registered Democrat, and a self-described liberal. I don't even use the word "progressive." I have amazed some people by saying, if she is a Democratic nominee next year, I am going to vote for her. I am not going to vote for the Republican — apologies to those who are present on that. I am just calling it as I

We cannot have our government systematically attacking and trying to repress points of view it doesn't agree with.

see it under the law.

Tom Fitton. Thank you, Dan. It is good that you are retired, because I am sure the Justice Department would be unhappy with your analysis, if you were an employee.

Dan Metcalfe. Well, I was somewhat constrained in the past, but you would be surprised at how candid I was even before I retired.

Tom Fitton. I have a feeling that is probably true. Thank you. Joe diGenova is, as I said in my introduction, a force to be reckoned with on these areas of law and scandal in the sense of how institutions in Washington respond to evident violations of law by high-level government officials and the trouble involved in holding those officials to account. His experience is hard to match in that area.

Joseph diGenova. Thank you, Tom. One hardly knows where to begin in this matter. The vast array of targets for legitimate inquiry is truly astounding. After 30 years of increasing accountability, transparency, and openness, this incident involving the Secretary of State's email has stopped the clock on accountability. This is the end of the road for all the people out there who care about getting information from their government.

As someone who has investigated organized crime, espionage, insider trading, and a host of corrupt activities and conducted congressional investigations of the Teamsters and other organizations, the basic facts in this case cry out for a formal investigation under the law, not just by Congress, but also by the Department of Justice. Let us take a look at what Dan just said.

What you have here is a brazen decision to prevent the disclosure of public information to the press, the Congress, the courts and the American people. It was a deliberate, planned legal strategy from the beginning of her tenure as Secretary of State. I will ask this question to both Dan and Paul as a rhetorical question, but I don't think it's going to be that: What if, in fact, the State Department from day one was the one that put the server in Chappaqua? Frankly, I think they did; and they have known about this before they ever told anybody about it. I believe that to be the case, and I believe it will be proven.

Joseph E. diGenova

Investigation: How you do them and what the process is. The investigation of Benghazi, one of the "phony scandals," as has been described by the White House, began with three committees in the House — Armed Services, Foreign Affairs, and Intelligence — and then with a fourth committee, Oversight, doing a generic investigation.

One of the things that you learn as an investigator is you create opportunities for the people you are looking at to make mistakes. You give them a rope; and one

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of the ways you do that is you issue subpoenas. You don't send letters asking for information. You send subpoenas, which have the force of law. In a minute, I will explain to you why that is important and give you an example from our Teamsters investigation in the 1990s. The reason you send a subpoena is that it creates a legal duty, an obligation to comply, whether it is to a committee, a court, or a grand jury… or in a civil case, where you are asked to produce evidence.

The House committees, with the limited exception of the House Oversight Committee, conducted three of the most incompetent, unsuccessful, and unproductive investigations of a major public policy question in the history of the House of Representatives. It is hard to describe how incompetent they had to be to not know Hillary Clinton had a private email account from which she conducted all of her business, personal and public.

Can you imagine three committees and a fourth conducting investigations for over a year and a half, and not one of them found out she had that server? You cannot imagine the conversations that are going on inside and outside law enforcement and among people who have worked on permanent subcommittees in the House and Senate. The incompetence of the Republican investigations is staggering.

How do you get to the bottom of things? When you're a prosecutor, you don't have a problem; you have search warrants; you have got subpoenas; you can get stuff. When you are in the House, it is not the same. You may be a public "grand jury" in the sense of an investigating committee, but you can't arrest anybody. (While the House does have the authority to arrest someone and put them in the well of the House and hold them in contempt, this has not been done since the 1800s.)

So you may not have the same legal remedies as a federal prosecutor, but you do have options. You can go to court and get a contempt ruling. You can litigate the issues, and you can make a problem exist in a bigger way by issuing subpoenas, something those committees did not do until the very end of their investigations, which was an embarrassment and a mistake.

I will tell you what we did in the Teamsters investigations in 1997. We were investigating a corrupt union from top to bottom run by Ron Carey. It was outrageous what was going on. So Congress decided to hold hearings. We were retained to be special counsel to the House of Representatives by Speaker Newt Gingrich and we began an investigation. By the way, the process ended with Carey being thrown out of office, and a reform president, James Hoffa, was made president of the union by election. He

has been reelected several times.

In the course of our investigations, we discovered that the Teamsters had recorded the meetings of their board, and we wanted those tapes. So we subpoenaed them. At the same time we were conducting an investigation, the U.S. attorney in New York, who was then Mary Jo White, was conducting a criminal investigation of Ron Carey and the Teamsters.

The Teamsters' general counsel called Ms. White and said that he had gotten a subpoena from the House for their board tapes, and he wondered if he could deliver those tapes to the U.S. attorney in New York, so we could not get them. She said that would be fine; and as a result, several years of tapes were delivered to New York, all of them.

When we discovered that, we called the U.S. attorney in New York and said, "You do realize those tapes which were handed over to you were under subpoena by the House of Representatives." The attorney's office indicated they knew it, but that it "doesn't matter." I said, "Would you please turn over the tapes?" They refused. I said, "All right. We will be back in touch tomorrow." I went back to my office. We sent two former FBI agents to New York that night with a forthwith subpoena.

Now, what is a forthwith subpoena? A forthwith subpoena says, "Give it to me." It means, "You turn it over right now." It is not a search warrant, but it is just as good under the law, because if you don't comply, you better have a good reason. A forthwith subpoena from the House of Representatives was the first one ever issued by the House in history. I then called the U.S. attorney the next day and asked again, "Will you turn over the tapes?" The answer was the same … no. So I replied by pointing out their two choices: "You can turn over the tapes to the two agents who are in the outer limits of your office, or tomorrow morning, on the floor of House of Representatives, you will be held in contempt of Congress. You make the decision. You have five minutes." We got the tapes.

Paul Orfanedes

What in the world is the House planning to do about Secretary Clinton's server? The notion that they have to wait is bogus. The evidence, theoretically, has already been destroyed, according to the Secretary and her lawyer, David Kendall. All the emails that she deemed "personal," whatever that means, have been permanently deleted.

When I began this, I said, this was brazen. You bet it is. Just think of what she has admitted publicly. She has said that she has destroyed theoretically government documents under subpoena by the House of Representatives and under subpoena in civil litigation all over the United States.

Who says that the deletions were personal? Her, her staff and her lawyer, based on her representations. That is not good enough. What is going to happen now is not just up on the Hill, but in all pending FOIA cases as well. Affidavits will need to be

filed under oath by people involved in the process of responding to those subpoenas. These will be Department of Justice lawyers, State Department lawyers, people who do records management at the Department of Justice and at the Department of State, Cheryl Mills and a whole bunch of other people, including Mrs. Clinton.

Mrs. Clinton is going to be required to testify in a federal court, and so is Cheryl Mills. I don't know whether or not any judge sitting in those proceedings will say that Cheryl Mills is "loathsome," like chief Judge Lamberth did about her. But there will be keen interest in terms of why no one was ever told that a private email system was the sole basis upon which the Secretary of State conducted business.

Let me go back to Benghazi for just a minute, for I don't want this to be about Benghazi — when the Accountability Review Board did its "investigation" of the Benghazi slaughter, they made it their business not to interview Hillary Clinton. Really digging weren't they? In fact, [Thomas] Pickering, Chairman of the Accountability Review Board and Admiral [Michael] Mullen, also on the board, claimed they didn't think it was necessary to talk to the Secretary.

I think some federal judges, and clearly Congress, are going to think it's necessary to talk to Mrs. Clinton. Her news conference and the representations of her lawyer, both in writing and verbally, have now set the stage for a major constitutional confrontation.

In my opinion, there should be a federal criminal investigation going on right now at the Department of Justice. They don't need to empanel a grand jury. They can start what is called a "preliminary inquiry." The evidence on the record at this point makes it clear that evidence has been destroyed. Nobody knows what the evidence is until somebody looks at it. If she is right, and everything that she had that is personal — and I'll bet you the Clinton Foundation is considered personal — has been permanently deleted, she committed a crime.

Tom Fitton. Thank you, Joe. Mrs. Clinton has said, "Don't worry; there was no classified information on this server." A lot of people, however, will be reviewing her records for classified information, which raises other personal criminal issues for Mrs. Clinton as well, with regard to the possible mishandling of classified information.

We are fortunate to have had some really meaningful testimony today from Dan Metcalfe and Joe diGenova. I thought it would be appropriate to close with you, Paul, because however important Joe's remarks are in terms of what ought to be done, we generally know what will be done. I think it is fair to say that it is going to be up to Judicial Watch to stay on top of Hillary Clinton's email scandal, given the Justice Department's conflicts of interest and Congress's political lack of interest in doing the hard work that Joe is suggesting …

Judicial Watch has proven itself time and time again at being able to obtain information and elicit the sort of accountability that Joe has been imploring other institutions to engage in. Paul, bring our listeners and our participants here up to date as to where we are and where we are going.

Paul Orfanedes. I thought it would be good to talk about some of what Judicial Watch

has done in response to the March revelation about Secretary Clinton's emails. We did what we always do, which is start our FOIA-ing. We have served at least 17 new FOIA requests in the last four weeks on the State Department.Included, as Joe will be glad to hear, are FOIA requests for records about the server to try to find out what the State Department knew about the server and if the State Department, in fact, paid for the server. I believe we have submitted requests as well to the Secret Service regarding the server, because they are responsible for security at the Clintons' residence in Chappaqua New York.

We have also submitted FOIA requests for records regarding the Secretary's usage of her iPod Blackberry, and iPhone. We have asked for her separation statement. There have been some news reports that she didn't do one, but we are waiting to see whether or not we get any records on that. A "no records" response, should there be one, may indicate she didn't do one. We have asked for all 55,000 pages, and we have asked for records about who knew what and when.

In addition to the 17 active requests outstanding, we have more in the hopper. Some of those requests will start coming due in early April, and you can bet there will be some lawsuits filed around that time. We went back to our database of pending FOIA requests to identify requests that implicated Mrs. Clinton's emails, and we filed one new FOIA lawsuit within two days of the revelation on March 2nd [by *The New York Times*] regarding the use of her personal computer for government business.

We also went through our databases of the hundreds of FOIA lawsuits we have filed to see what effect such a revelation might have on either pending or closed cases. We identified at least nine pending cases that could be impacted and eight closed cases. With respect to the pending cases, we have asked courts for status conferences. We have reached out to opposing counsel, trying to get information on what the State Department is planning to do. One of the things the State Department is saying is that it will process all 55,000 records and make them available through FOIA requests.

We have also asked the court to open some closed cases. The State Department had represented to us in some cases that they had searched the Office of the Secretary and what is called the Executive Secretariat, which is sort of a central office for high-level State Department officials' correspondence and records, including their email. At no point, however, were we told that Secretary Clinton's emails were not captured or that

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other high-level State Department employees, such as, former top staff official, Huma Abedin and a couple of others, were likely not captured either because they were using her private server.

One case has been reopened, and we are in negotiations with the State Department about reopening a second case. We are looking at others as well. The Federal Rules of Civil Procedure allow you to reopen a case, if new evidence is discovered. Included are such factors as fraud, misrepresentation, and misconduct, which were the basis for the first case we moved to reopen. While the State Department currently claims they didn't realize we were moving under fraud and misrepresentations (though it's plain on the face of our papers), they seem willing to go back and revisit how these FOIA requests were affected.

So that is sort of an overview of what we have had to go through in order to figure out how our efforts in filing FOIAs may have been effected and what can be done about it. I am sure we have spent hundreds, if not thousands, of staff hours since March 2nd , just working on this problem. As you can see, it has been a tremendous drain on the organization, in response to Mrs. Clinton's decision not to comply with the Federal Records Act.

Panel Discussion

Tom Fitton. I have always felt that this is a "catch me if you can" presidency, and it seems that a shell game may be taking place with these records. The State Department's legal position, as best I can tell, is "Hillary Clinton took these records out of the State Department, or she didn't have them within the State Department; they weren't in the custody or control at the State Department; so too bad if we didn't search them. We searched everywhere we thought they would be; and FOIA doesn't cover this. So now we have these records; will look at them, and we may be able to pass some of them on to you under a FOIA request.

I have always felt that this is a "catch me if you can" presidency, and it seems that a shell game may be taking place with these records.

What is your response, given your experience under FOIA, about the extraordinary

claim that the head of an agency can evade FOIA simply by removing records from the office?

Paul Orfanedes. As Professor Metcalfe referenced, the Federal Records Act requires that government records be processed, stored, and available for use. It is the head of the agency's responsibility to do that. So this notion that Secretary Clinton could concoct this scheme by which she would thwart all of her obligations under the Federal Records Act is not an acceptable response.

Now, the question is what remedy FOIA allows. There might be applicable provisions of law, including criminal provisions, that allow remedies. One particular provision makes it a crime to remove federal records from a federal agency without the permission of the Archivist of the United States.

I think our position is that these records were federal records. They were removed when Mrs. Clinton concocted this scheme to make sure all these records would be on a private server and not on a State Department server. It is a theory we will be prepared to test when we get to the stage in court where we're talking about remedying situations.

Daniel Metcalfe. It might depend upon what the meaning of "removed" is.

Paul Orfanedes. Certainly. We are dealing with the Clintons.

Daniel Metcalfe. Ordinarily, one would think "removed" has to do with something being at point A and being taken to point B. In this case, that "something" never existed at point A.

Paul Orfanedes. I think it existed at point A. It was on the computer at least until they hit the send button.

Daniel Metcalfe. Not if it was her private device and it was her personal account. It wouldn't have been on any State Department computer.

Paul Orfanedes. Those are all great facts we can try to get into in discovery and then FOIA requesting. You are right; it depends on what the definition of "remove" is. You know, it is not as clear as Sandy Berger and other Clinton administration officials sticking records in their socks and walking outside of the archives with them. But it is analogous.

Tom Fitton. It strikes me that if you are the head of an agency and you set up a system to conduct all government business, that is a government account. You may pretend you have personal emails on your computer, but many people conduct personal business on government accounts. It is not atypical with federal agencies. In fact, it is frowned upon; and frankly, it shouldn't happen.

As Mrs. Clinton has said, hundreds of people in the agency knew she had this account. So the idea that she "removed" her government emails in a way that would have

I am absolutely astounded at what Judicial Watch has accomplished in this arena. It has just been truly wonderful to watch public interest litigation be conducted the way it should be: excellent lawyers and good arguments, which has led to uncovering some of the most important facts that have been revealed until now.

prevented them from being subject to FOIA is untenable. I think it is fair to say our goal is to recover the emails that have been deleted, preserve those that are still out there, and make all of it subject to disclosure as the law requires.

You know, we ran into this story with the Lois Lerner emails. In that case, I am convinced it was the FOIA litigation by Judicial Watch that forced the disclosure of her "lost" emails. After we were told those emails were lost, we pushed harder against the Justice Department; and, in my view, they continued to mislead the court. But eventually, they fessed up and the Lerner emails became un-lost very quickly. Well, the Clinton emails may be on servers that are backed up, and there may be other emails out there.

Joseph diGenova. I am absolutely astounded at what Judicial Watch has accomplished in this arena. It has just been truly wonderful to watch public interest litigation be conducted the way it should be: excellent lawyers and good arguments, which has led to uncovering some of the most important facts that have been revealed until now.

But I want to sort of go on top of what Dan has said. I believe Mrs. Clinton decided from the beginning of her tenure as a constitutional officer — she is a constitutional officer — that she would procure a server with the assistance of the State Department, including having them install it in her home in Chappaqua. When she did that, Chappaqua became the State Department. Those records were in fact in the possession of the United States government at that point. I am going to be fascinated by the argument she is going to make that they were not.

She moved the secretary's office from Foggy Bottom to Chappaqua. There is simply no disputing that. She made a decision that her business would be conducted on that server. That was her decision. It wasn't anybody else's decision. When she did that, she transferred federal records into that house and into that server.

They may very well argue whatever they want to argue about it, but I think they are going to have a really tough time convincing anybody those were not government records from day one in her possession in that place. What is crucial, is that nobody knows what she ordered deleted. Her representations are irrelevant. They mean nothing. They are of limited evidentiary value, given the scheme that was worked out here to deny access and to deny information.

Daniel Metcalfe. So that line of reasoning is basically two-fold: when she began using

her personal email account, that was functionally an official email account, and when she involved her private email server, that was functionally a government email server as a practical matter.

There is some basis in law to add to your legal analysis and how you handle your cases. If you look at footnote 10 of the *Kissinger* decision [*Kissinger v. Reporters Committee for Freedom of the Press*, 445, U.S. 136 (1980)], footnote 10 basically identifies a particular fact that happened to be the case in Kissinger, in which the FOIA request filed by the Reporters Committee for Freedom of the Press was received by the agency after the "removal" of records …

Joseph diGenova. Let's remember what Kissinger did. When his term was over, he removed his official documents. He removed all of them. Mrs. Clinton started her removal of documents at the inception of her secretariat. She began with a purposeful action to conceal and eventually, according to her and her lawyers, delete information which is presumptively public record.

In my view, what Kissinger did is normal. He wanted to write his memoirs. He took the papers. He gave bunches of them back, but the big difference is he didn't destroy any. She admits she destroyed more than 50 percent of everything that was on that server; and if anybody thinks that everything that is official has been turned over, you are living in a dream world.

Tom Fitton. I don't know what the facts will show. I suspect that when she said the Secret Service is protecting this server, she was not so naïve as to think that physically protecting a server from being stolen out of her house was sufficient. If this indeed was a State Department server, who in the agency allowed Mrs. Clinton to delete those records from a state agency server? Who in the White House knew about this issue? Why did they allow her to delete those records?

The implications here are staggering, and you can see why smart Democrats on the Hill, not really knowing what all the facts are, like Senators [Dianne] Feinstein and Dick Durbin, came out and said, "Just tell us what's happened." Unfortunately, Mrs. Clinton didn't read between the lines, and decide to be truthful with regard to those requests. I think folks on both political parties understand there is a big issue here.

Audience Participation

Tom Fitton. I want to leave some time for some questions before we end our discussion today.

Question. I want to go back to the briefing that Clinton got presently at the outset. If I am Patrick Kennedy, the State Department Under Secretary of State for Management, in that meeting, and she says, "I am going to use my own server for email," what are my legal responsibilities and obligations at that point to attempt to ensure or at least to memorialize what happened in that meeting?

Daniel Metcalfe. Routinely, this sort of administrative meeting would be held in one form or fashion sooner rather than later. I would daresay that the top administrative career official of an agency has the responsibility to make it clear what the law and policy requires, to be more refined and say, "Well, just because you're not flatly prohibited from ever using a personal account, doesn't mean you can always use a personal account." There's a lot of daylight in between the two.

Assuming that such a meeting occurred and that it was clear she was planning to use her own computer for both government and personal emails, I believe he would have had an obligation to contact the people at the National Archives and Records Administration, who hold the statutory responsibility for overseeing and properly implementing the Federal Records Act, and inform the Archivist as to her intent. Hopefully, the result would be that she would receive a call that points out, "Mrs. Secretary Clinton, you just can't do that. It's not consistent with, and indeed flouts, the Federal Records Act."

Question. Which is the next part of my question. At some point, it became obvious to a bunch of people that she was using her own computer for government email. Is there an obligation at that point?

Daniel Metcalfe. Well, I am going to cut these people a bit of a break, so to speak, because they are presumably not administrative people. They do not know what took place in the meeting and they are not likely to be experts in the Federal Records Act. Maybe they assume that it is okay. I don't think they have a direct obligation to do otherwise and to take any action.

It is really is the administrative people who have the delegated authority from the Archivist to make sure that the Federal Records Act is followed at that agency. So if the records management people learned thereafter, yes, they indeed would have a responsibility to make the matter known.

Joseph diGenova. Let me add to that, if I might. Your question is actually at the heart of the matter. Mr. Kennedy is a very important person in this entire scenario of records production and of policy issues related to record production. Mr. Kennedy is one tough cookie.

The bottom line here is whatever the duties were of a whole bunch of people at the State Department, they didn't perform them. I agree with Dan. You can't put the onus for this on the people inside the State Department getting an email from Hillary. It is an email. They don't know where she is and what she's doing.

At a certain point, the information management people at the Department know that she is not using an official email account. They know that for a fact, because she doesn't have one. It doesn't take a lot for somebody to start asking questions like, "Excuse me, Madame Secretary but just how are you communicating with people in the Department? And where are those records?"

This is brazen in terms of evasion of legal duty by everybody at the State Department

— and especially the secretary — that it is simply staggering. It is unbelievable. With a straight face, she stands up at the U.N. and talks about yoga lessons and laughs about it before a media group recently and makes a joke about her emails, and, of course, the media in the audience laughs uproariously at this wonderful event.

What she has done has undermined people's confidence in the ability to get valuable public records. Her records were valuable. Whatever you may think of her, she was the Secretary of State. That's a pretty big job. And she took it upon herself to change history. She does not have the right or the authority to change history, but she did.

Tom Fitton. Mr. Kennedy is still at the agency, still is the responsible official for record searches and managing records and that separation agreement … Mrs. Clinton is the agency for legal purposes here. There's no daylight as far as we are concerned between this current State Department and Mrs. Clinton. This is State Department responsibility, and the folks there are as liable, potentially, as Joe points out, as others.

Daniel Metcalfe. Can I make a minor point, because there are a lot of facts here that are undisputed. They come from Secretary Clinton herself or from people speaking on her behalf. But I don't know for a fact that Patrick Kennedy was in such a meeting. For all I know for sure, he might have been having surgery that month and it could have been a deputy or two deputies or something like that. Really do not know for sure. But the responsibility is in his office for somebody to take the lead on such an important matter.

Tom Fitton. Well, there have been several court filings since this scandal broke. And I think we have all the lawyers here from Judicial Watch who have been involved. And I think I am correct in saying the State Department has yet to disclose to us when they became aware of these accounts of Mrs. Clinton.

Joseph diGenova. I agree completely with what Dan said about not knowing who it was. But here's a better question: How about if she didn't get a briefing at all? I'm going to tell you something — she didn't. She didn't get a briefing, because they treated her exactly the way Thomas Pickering of the Accountability Review Board treated her: You don't touch her. You don't get her angry at you and Cheryl Mills angry at you by asking tough questions. You treat her like a queen. She gets a pass. She doesn't have to do anything. I would be amazed if she got the traditional briefing that other Secretaries of State have gotten when they came into office.

Question. I seem to remember that the Department has a category similar to "for official use only." I believe it's LOU — "limited official use." It's above unclassified, but below classified. I am wondering if the daily emails with the Department, if they're not classified, would probably be in this LOU category. Does that make some difference in terms of security, or the lack thereof, with regard to the server up in New York?

Daniel Metcalfe. I have some familiarity with what is called "sensitive, but unclassified" information, because I wrote the White House memo in March of '09 that addressed the subject. I do know that the State Department uses at least two such designations in what is known as the pseudo-secrecy realm. One is called NOFORN [No Foreign National], and the other is NODIS [NASA Online Directives Information

System]. The designations have to do primarily with labels attached to records, most easily in the paper realm, that call for a special safeguarding and special handling.

Your point I think is a good one. I touched on it in the *Politico* magazine article I wrote a couple of weeks ago in which I state that even if nothing on her server was classified — which is what she has said and for all any of us in this room know, it is entirely possible — it is very hard to believe there wasn't at least some sensitive, but unclassified, information in which a special handling requirement would have been warranted.

Tom Fitton. If we take Mrs. Clinton at her own word that this server was private, it didn't have the security requirements that State Department servers would, so just imagine the types of information that would be left on the equivalent of an Internet park bench by Mrs. Clinton as a result.

You have classified information potentially and you have personnel information potentially. Personnel issues are presumably part of her handling of her day-to-day duties, so someone's personnel files are on the Internet park bench, someone's Privacy Act protected files are on an Internet park bench, sensitive information from abroad are on that Internet park bench, maybe sources that need to be protected are on that Internet park bench.

Maybe the private information of corporations doing business with the State Department is on that Internet park bench. Maybe security concerns about Benghazi or security issues related to other diplomatic facilities are on that Internet park bench. You can imagine those who would be interested in that.

You have all this information that, as the agency head, she is supposed to protect. In protecting that information, she is protecting other people in the agency and citizens outside the agency, and other government officials outside the agency, both here and abroad. So there are a lot of people who have potentially been harmed by this misconduct, if the information was not secured as it was supposed to be. So this why you get the reaction that you're getting from Joe diGenova.

As Paul has pointed out, we have been gamed as well. Fortunately, we have access to the courts, and we have great lawyers. But there are a lot of people who know they have been gamed, who don't have access to the courts, and probably will never get justice by this.

I will close on this note. As I have said, I think this whole case was broken open because of our insistence on getting information from Mrs. Clinton and her office about her involvement in the Benghazi scandal. We talk about the Benghazi scandal as if it is just a political issue, but it is about whether or not four Americans died unnecessarily as a result of decisions made by Mrs. Clinton and the Obama administration -- by refusing to provide them security that was requested, security that was pulled out eventually, and then, once the attack began, not going to their aid. So there are people who have died that need to be vindicated. That is why

Tom Fitton

we were investigating this.

The failure to go protect those people, the failure to provide them security and then lying about what happened for political purposes has really decimated the morale of the military and other civilian personnel deployed overseas. Because the compact has been that if things hit the fan, the government will be there to protect them. We were investigating why that compact was torn asunder by this administration — and this email scandal is what we uncovered.

In the light of all that has become and the controversy, and with a select Congressional committee asking questions, Hillary Clinton deleted all of her emails by the admission of her own lawyer. Really incredible. So this is not your typical political scandal. There were no dead bodies in Watergate.

Daniel Metcalfe. Tom, could I just touch on one point with respect to the word "delete," and that's a relatively recent development as of Friday of last week, when I believe the phrase used by the Gowdy committee or subcommittee is that he heard from David Kendall that it was "wiped clean."

I am told by my technical experts, that traditionally, to wipe something clean, you would degauss it — that would be an electromagnetic fix — or you would even mechanically take a hammer to the darned hard drive, but that nowadays, there is software, especially something called KillDisk. Aptly named perhaps, it is approved by NSA. Supposedly, if you run it three times over, it will sufficiently overwrite what's there. I am told that it takes care of not just the text of the email itself, but also the metadata surrounding it and the server logs.

If she took that extraordinary step, then perhaps it would all be gone; but then, the very taking of that step might be a basis for inferring intent that would be more in Joe's arena as to what she was taking great measures to do.

Joseph diGenova. Let me add one thing factually about Benghazi. It's really important for people to realize why Patrick Kennedy is such an important person. Just remember who he was. All of those African bombings during the '90s, he was the guy in charge of security. He got promoted after those disasters. During Benghazi, Ambassador [J. Christopher] Stevens wanted security increased. He had 38 people. He wanted more. The country was a disaster. Do you know what Kennedy did? He reduced the number of security people from 38 to nine.

Tom Fitton. As I said, we just obtained these records about Mrs. Clinton's top staff, Cheryl Mills, her Chief of Staff. There is no doubt Mrs. Clinton and her top people were being updated about the truth of what was going on in Benghazi as the attack occurred, and yet they put out that false information.

There is a great incentive for those emails to disappear, not only because of Benghazi, but also because she abused her office to raise money for her political operation at the foundation, and to launder money for her personal benefit. Like I said, this

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idea of "personal versus official records" is one in which that you need to take their explanations with a grain of salt.

I am pleased to say that Paul Orfanedes and our litigation team here at Judicial Watch are going to be raising these issues with various courts. We are already before two federal court judges, and we will shortly be before a third. Plus, we are prepped to go to other court judges. There has got to be accountability here.

I would encourage those of you listening to ask their members of Congress why they are not doing what Judicial Watch is doing. Why aren't they hiring Judicial Watch or Joe diGenova to do another special prosecution of this scandal? Why is the Justice Department continuing to do nothing and arguably impeding further information gathering about this scandal.

It is getting worse, not better, for Mrs. Clinton. The media will try to move on and pretend it is all about politics, as she announces her run for the presidency. But running for the presidency should not protect that person from serious accountability under law.

That seems to be the way it works in Washington. We are going to change that through our litigation. Running for high offices doesn't place you above the law. Mrs. Clinton should learn that. Certainly, the State Department and the White House itself need to start paying attention to their obligations to the public interest as opposed to the political future of the Democratic Party.

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