


DECLARATION

 I, Christopher J. Farrell, an employee of Judicial Watch, Inc., 501 School Street, SW, Washington, DC 20024, wish to make the following statement:

1. On June 11, 1999 and June 16, 1999 a colleague and I interviewed Leslie Gail Kennedy, the ex-wife of former Associate White House Counsel William H. Kennedy III at her residence of 2200 Andover Court, #801, Little Rock, Arkansas, 72227.
2. During the June 11<sup>th</sup> interview, Mrs. Kennedy said that William H. Kennedy III brought FBI files from his White House office to their home in Alexandria, Virginia. On several occasions she observed William H. Kennedy III working with “stacks” of FBI files in their home. She stated that he would spend hours reviewing information in the files and making entries from the files into a database he maintained on his laptop computer.
3. Mrs. Kennedy believes the database her husband created was intended to make FBI file information accessible and useful to the Clinton Administration. I asked her whether Reagan and Bush staffers’ files were in the “stacks” he reviewed and loaded into the laptop database. She responded by asking rhetorically, “Who would benefit from having this information available?” She added rhetorically, “Why would her husband bother to review files of Democrats and make entries on his laptop -- especially since the files of Democrats would be routinely available in his White House office?” Mrs. Kennedy stated that Hillary Clinton came to Washington, DC with an agenda, and that she still has one. In offering an example of how information from the FBI files might be useful, Mrs. Kennedy

pointed out that Mrs. Clinton's first major policy objective was "health care reform"; and that Mrs. Clinton anticipated resistance from many people in forwarding her agenda. Mrs. Kennedy then arched her eyebrows and became silent.

4. A colleague and I visited Mrs. Kennedy again on June 16<sup>th</sup>. She invited us into her home, but refused to make a written statement. Mrs. Kennedy stated that she "could not be seen by people in this administration as being out here volunteering information. . .if I get subpoenaed, that's a different story -- at least I'll have some cover." Mrs. Kennedy was visibly shaken and frightened. She trembled and her hands shook. She began a sentence with words to the effect of "You just don't understand what it's like here. . .", and then her voice trailed off, leaving the thought unfinished. She said that she had other business to attend to; at which point we thanked her for her time and departed.
5. Based on my experience, Mrs. Kennedy's behavior clearly demonstrates that she is very intimidated by persons within or associated with the Clinton Administration. I believe Mrs. Kennedy fears for her livelihood or her safety.
6. The June 11<sup>th</sup> and June 16<sup>th</sup> interviews with Mrs. Kennedy point out three (3) specific areas where the testimony of William H. Kennedy III on October 15, 1998 in the matter of *Cara Alexander, et al v. Federal Bureau of Investigation, et al*, is directly at odds with the eyewitness accounts of Mrs. Kennedy.
  - a. In Mr. Kennedy's testimony at 34:22 -- 38:3, he denies ever using a laptop computer while working at the White House. He states that he "rarely" brought work home from the White House; and when asked specifically if

*CFJ*

he ever brought work home related to the clearance process, he responds, "I don't recall doing so, no." When pressed for a definitive answer, Mr. Kennedy states, "I simply can't recall, Mr. Klayman. It's been a long time."

- b. In Mr. Kennedy's testimony at 127:21 – 129:2, he states that FBI files were "locked up after hours" and that access to the files was restricted to "members of the Counsel's Office."
- c. In Mr. Kennedy's testimony at 256:3-24, he denies any knowledge of whether or not information from FBI summary reports or raw data were ever loaded onto a White House computer or database.

*CFJ*

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

Executed: June 29, 1999

*Christopher J. Farrell*

Christopher J. Farrell