



**Judicial
Watch**[®]
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is above the law!*

VIA FEDEX

February 8, 2019

U.S. Department of Justice
Office of the Inspector General
950 Pennsylvania Avenue, N.W.
Suite 4706
Washington, D.C. 20530-0001

**Complaint for Investigation into Potential Violations of Federal Law and/or
Department of Justice Regulations**

Dear Sir:

Judicial Watch, Inc. is a non-profit, non-partisan educational foundation that promotes transparency, accountability, and integrity in government and fidelity to the rule of law. We regularly monitor the operations of the federal government as part of our anti-corruption mission.

This letter serves as our formal complaint for you to open investigations into two (2) matters related to Special Counsel Robert Mueller's investigation, that we believe may involve violations of federal law and/or Department of Justice regulations.

The first matter involves reported leaks by federal law enforcement officials to reporters at *BuzzFeed News*, an online news outlet, alleging President Trump directed his former legal counsel, Michael Cohen, to lie to members of Congress in sworn testimony. Specifically, *BuzzFeed* reporters Jason Leopold and Anthony Cormier published an article titled "President Trump Directed His Attorney Michael Cohen To Lie To Congress About the Moscow Tower Project."

The opening paragraph of the article, published on January 17, 2019, stated:

President Donald Trump directed his longtime attorney Michael Cohen to lie to Congress about negotiations to build a Trump Tower in Moscow, **according to two federal law enforcement officials involved in an investigation of the matter.**
[Emphasis added]

(<https://www.buzzfeednews.com/article/jasonleopold/trump-russia-cohen-moscow-tower-mueller-investigation?ref=hpsplash>)

We note that, according to public reporting, former FBI Director James Comey launched a federal leak investigation following comments made by former New York City Mayor Rudy Giuliani in a *Fox News* interview in 2016 suggesting that he had advance knowledge gleaned from federal agents of the reopening of the Hillary Clinton email server investigation resulting from the discovery of Mrs. Clinton's emails on Anthony Weiner's laptop.

(<https://thehill.com/homenews/administration/393134-giuliani-fbi-asked-me-about-tease-of-surprise-before-election>)

Therefore, as a matter of equal application of the law, we request that a leak investigation related to the *BuzzFeed* reporters' claims be undertaken.

The second matter to which we bring your attention that requires an Inspector General investigation relates to the apparent advance unauthorized disclosure or notice provided to *CNN* of the FBI arrest of former Trump associate Roger Stone on January 25, 2019.

Specifically, information related to the pending arrest of a suspect would be considered Limited Official Use (LOU) information, which is governed by DOJ Regulation 2620.7, to wit:

Limited Official Use information is unclassified information of a sensitive, proprietary or personally private nature which must be protected against release to unauthorized individuals, and this term is prescribed for use within the Department to signify such information.

Among those categories of information the Department recommends be categorized as LOU information is "Information that could result in physical risk to individuals."

(<https://www.justice.gov/jmd/doj-26207-control-and-protection-limited-official-use-information>)

The close proximity of civilians in the form of *CNN* journalists to the scene of an arrest that apparently required upwards of two dozen heavily armed federal agents would seem to pose a physical risk to those individuals.

Therefore, the apparent advance unauthorized disclosures or notice provided to *CNN* by federal officials of the pending arrest of Mr. Stone would appear to violate DOJ guidelines. Regulation 2620.7 also stipulates:

UNAUTHORIZED DISCLOSURE. Heads of Departmental organizations shall ensure that prompt and appropriate administrative action is taken against personnel responsible for disclosure of Limited Official Use material to unauthorized

individuals and issue appropriate directives, if needed, to affect this action.

We hereby request that the Department of Justice Office of the Inspector General undertake investigations into both aforementioned apparent violations of federal law and/or regulations.

Thank you for your consideration of this matter.

VERIFICATION

The individual submitting this complaint acknowledges that the information contained herein is true and correct to the best of his knowledge and belief, pursuant to 18 U.S.C. § 1001.

Submitted by,



Thomas Fitton
President
JUDICIAL WATCH, INC.