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United States Senate

COMMITTEE ON THE JUDICIARY

WASHINGTON, DC 20510-6275

April 27, 2026

VIA ELECTRONIC TRANSMISSION

Mr. Todd Blanche
 Acting Attorney General
 Department of Justice

The Honorable Kash Patel
 Director
 Federal Bureau of Investigation

Dear Acting Attorney General Blanche and Director Patel:

For over a decade, I've raised concerns regarding alleged actions taken by former Secretary of State Hillary Clinton, including her use of non-government email for official business, mishandling of highly classified information, potential campaign finance violations, and dubious Clinton Foundation financial dealings.¹ For instance, on May 17, 2016, I wrote a letter to then-Federal Bureau of Investigation (FBI) Director James Comey raising concerns that many of the emails found on her non-government server blurred lines between the actions taken on behalf of the State Department, Clinton Foundation, and Teneo, a private firm founded by a former counselor to President Clinton.² Then, on July 6, 2016, I requested information from then-Director Comey regarding public corruption issues and the Clinton Foundation and questioned the Director on whether the FBI investigated the Clinton Foundation regarding former President Clinton's speaking fees from foreign governments while Hillary Clinton was Secretary of State.³ Further, on August 8, 2016, I wrote to the Department of Justice (DOJ) asking the Department to explain its reported decision to drop reported inquiries into Clinton Foundation and State Department interactions; specifically, allegations that the State Department, during Secretary Clinton's tenure, took favorable actions for Clinton Foundation donors.⁴ More

¹ Letter from Senator Charles E. Grassley, Chairman, Senate Committee on the Judiciary, to the Honorable James Comey, Director, Federal Bureau of Investigation (May 17, 2016), https://www.grassley.senate.gov/imo/media/doc/2016-05-17_ceg_to_fbi_clinton_investigation_special_counsel.pdf ("Similarly, the content of many of the released emails implicates Constitutional issues and public corruption laws by raising issues relating to joint income from paid speeches given by President Clinton for foreign government entities, as well as the blurring of the lines between the actions taken on behalf of the State Department, the Clinton Foundation, and Teneo, a private firm founded by a former counselor to President Clinton."); Press Release, Office of Senator Charles E. Grassley, *Grassley Calls For Greater Transparency at FBI Following Clinton Investigation* (July 6, 2016), <https://www.grassley.senate.gov/news/news-releases/grassley-calls-greater-transparency-fbi-following-clinton-investigation>; Press Release, Office of Senator Charles E. Grassley, *Grassley Seeks Explanation of Reported Justice Department Decision to Drop Clinton Foundation Inquiries* (Aug. 15, 2016), <https://www.grassley.senate.gov/news/news-releases/grassley-seeks-explanation-reported-justice-department-decision-drop-clinton>; Rachel Bade, *Grassley to DOJ watchdog: Probe Clinton email investigation*, POLITICO (Nov. 2, 2016), <https://www.politico.com/story/2016/11/grassley-fbi-clinton-investigation-230662>; Press Release, Office of Senator Charles E. Grassley, *Grassley: Deliberate Mishandling of Classified Information Requires Accountability* (Oct. 28, 2019), <https://www.grassley.senate.gov/news/news-releases/grassley-deliberate-mishandling-classified-information-requires-accountability>; Press Release, Office of Senator Charles E. Grassley, *FBI Records Show Partisan Officials Killed Clinton Campaign Investigation* (Nov. 13, 2025), <https://www.grassley.senate.gov/news/news-releases/grassley-fbi-records-show-partisan-officials-killed-clinton-campaign-investigation>; Press Release, Office of Senator Charles E. Grassley, *Grassley Seeks Information from FBI Informant in Uranium One Probe* (Oct. 19, 2017), <https://www.grassley.senate.gov/news/news-releases/grassley-seeks-information-fbi-informant-uranium-one-probe>; Press Release, Office of Senator Charles E. Grassley, *Grassley Seeks Information about FBI Raid of Whistleblower's Home* (Dec. 4, 2018), <https://www.grassley.senate.gov/news/news-releases/grassley-seeks-information-about-fbi-raid-whistleblower-s-home>; Press Release, Office of Senator Charles E. Grassley, *New Records Reveal DOJ's Yearslong Efforts to Shut Down Investigation into Clinton Foundation* (Dec. 15, 2025), <https://www.grassley.senate.gov/news/news-releases/new-records-reveal-doj-yearslong-efforts-to-shut-down-investigation-into-clinton-foundation>.

² Letter from Senator Charles E. Grassley, Chairman, Senate Committee on the Judiciary, to the Honorable James Comey, Director, Federal Bureau of Investigation (May 17, 2016), https://www.grassley.senate.gov/imo/media/doc/2016-05-17_ceg_to_fbi_clinton_investigation_special_counsel.pdf ("Similarly, the content of many of the released emails implicates Constitutional issues and public corruption laws by raising issues relating to joint income from paid speeches given by President Clinton for foreign government entities, as well as the blurring of the lines between the actions taken on behalf of the State Department, the Clinton Foundation, and Teneo, a private firm founded by a former counselor to President Clinton.");

³ Press Release, Office of Senator Charles E. Grassley, *Grassley Calls For Greater Transparency at FBI Following Clinton Investigation* (Jul. 6, 2016), <https://www.grassley.senate.gov/news/news-releases/grassley-calls-greater-transparency-fbi-following-clinton-investigation>.

⁴ Press Release, Office of Senator Charles E. Grassley, *Grassley Seeks Explanation of Reported Justice Department Decision to Drop Clinton Foundation Inquiries* (Aug. 15, 2016), <https://www.grassley.senate.gov/news/news-releases/grassley-seeks-explanation-reported-justice-department-decision-drop-clinton>.

recently, on December 15, 2025, I released records revealing the DOJ and FBI's apparent efforts to shut down investigations into the Clinton Foundation.⁵

Additionally, since 2015, I've raised concerns regarding the acquisition of Uranium One, a then-owner of U.S. based uranium assets, by Atomredmetzoloto (ARMZ), a subsidiary of Russia's state-owned energy corporation, Rosatom.⁶ Specifically, in June 2015, I wrote to several member agencies on the Committee on Foreign Investment in the United States (CFIUS) raising concerns related to the national security implications of the acquisition, which effectively ceded some U.S. uranium production capacity to the Russian government.⁷ My work noted that there were also concerns related to potential conflicts of interest between the State Department and the transacting parties—specifically, that the Chairman of Uranium One at the time, Ian Telfer, had made donations to the Clinton Foundation in the millions of dollars while Hillary Clinton was Secretary of State.⁸ Additionally, in October 2017, I sent letters to several federal agencies requesting information on whether CFIUS was informed of ongoing criminal investigations into Rosatom officials, as well officials at Tenex and Tenam—both subsidiaries of Rosatom—at the time of the transaction.⁹

As a follow up to that prior work, on July 18, 2025, I wrote to DOJ and FBI requesting all records related to the FBI's Clinton Foundation investigation.¹⁰ The letter was based on years of investigative work with courageous whistleblowers. Since then, your offices have produced records based on these whistleblower disclosures and I appreciate your cooperation with my investigative work.¹¹

On January 29, 2016, according to an FBI electronic communication (EC) provided to my office, the FBI opened a "Preliminary Investigation on the Bill, Hillary, and Chelsea Clinton Foundation" related to "its alleged use by foreign entities to corruptly influence decision or action on questions or matters, causes or proceedings before the U.S. State Department."¹² Included in the FBI's EC are numerous allegations of foreign influence concerns that arose "from speaking fees and donations to the [Clinton] Foundation."¹³

For instance, according to the 2016 FBI EC, then-Secretary Clinton had to sign a Memorandum of Understanding (MOU) regarding these foreign influence concerns, which she allegedly "failed to comply with" by "failing to disclose four foreign donations totaling \$2.35 million that were given by Ian Telfer, the then-head of the Russia government's uranium company, Uranium One."¹⁴

⁵ Press Release, Office of Senator Charles E. Grassley, *New Records Reveal DOJ's Yearslong Efforts to Shut Down Investigation into Clinton Foundation* (Dec. 15, 2025), <https://www.grassley.senate.gov/news/news-releases/new-records-reveal-doj-yearslong-efforts-to-shut-down-investigation-into-clinton-foundation>.

⁶ Letter from Senator Charles E. Grassley, Chairman, Senate Committee on the Judiciary, to the Departments of Justice, State, and Treasury (Jun. 30, 2015), https://www.grassley.senate.gov/sites/default/files/news/upload/CEG%20to%20DOJ%20%28CFIUS%20%2B%20Uranium%29%2C%206-30-15_0.pdf; Letter from Senator Charles E. Grassley, Chairman, Senate Committee on the Judiciary, to the Departments of Justice, State, Treasury, Commerce, Defense, Energy, Homeland Security, Director of National Intelligence, United States Trade Representative, Office of Science and Technology Policy (Oct. 12, 2017), <https://www.grassley.senate.gov/sites/default/files/constituents/20171012%20CEG%20to%20DOJ%20%28Uranium%20One%20Follow%20up%29.pdf>.

⁷ Letter from Senator Charles E. Grassley, Chairman, Senate Committee on the Judiciary, to the Departments of Justice, State, and Treasury (Jun. 30, 2015), https://www.grassley.senate.gov/sites/default/files/news/upload/CEG%20to%20DOJ%20%28CFIUS%20%2B%20Uranium%29%2C%206-30-15_0.pdf.

⁸ *Id.*

⁹ Letter from Senator Charles E. Grassley, Chairman, Senate Committee on the Judiciary, to the Departments of Justice, State, Treasury, Commerce, Defense, Energy, Homeland Security, Director of National Intelligence, United States Trade Representative, Office of Science and Technology Policy (Oct. 12, 2017), <https://www.grassley.senate.gov/sites/default/files/constituents/20171012%20CEG%20to%20DOJ%20%28Uranium%20One%20Follow%20up%29.pdf>.

¹⁰ Letter from Senator Charles E. Grassley, Chairman, Senate Committee on the Judiciary, to the Honorable Pamela Bondi, Attorney General, Department of Justice, and to the Honorable Kash Patel, Director, Federal Bureau of Investigation (Jul. 18, 2025), On file with Committee staff.

¹¹ The redactions in the attached records were made by the federal government.

¹² Exhibit 1 at 1-12.

¹³ *Id.* at 3.

¹⁴ *Id.*

Additionally, the FBI EC outlines allegations the Clinton Foundation hid a “foreign donation of two million shares in Polo Resources,” which was made by Stephen Dattels, “a Canadian mining executive.”¹⁵ The FBI EC states that “eight weeks after the donation was made, James Moriarty, U.S. Ambassador to Bangladesh, persuaded the energy adviser to the Prime Minister of Bangladesh to reauthorize the opening of mines, including Phulbari Mines to pit mining, which Polo Res[ources] had a financial interest in.”¹⁶ The FBI EC also raised concerns about the Uranium One acquisition, as well as the involvement and relationship between the Clintons and Frank Giustra—a billionaire Canadian mining executive.¹⁷

The FBI EC noted that in 2010, “Hillary Clinton stated she would actively lobby Congress to pass [] legislation,” related to a free trade agreement with Colombia that Congress was considering at the time.¹⁸ According to the EC, during this same time, former President Bill Clinton, then-Secretary of State Hillary Clinton, and Frank Giustra met with then-Colombian President Alvaro Uribe.¹⁹ According to the FBI EC, Giustra “was invested in oil, natural gas, coal and timber in the country.”²⁰ Days after the meetings with the Clintons and President Uribe, a company that Giustra had a financial interest in allegedly received timber concessions from the Colombian government.²¹

Finally, the FBI EC, in a section titled “Miscellaneous Information,” outlined two separate instances of potential pay to play allegations.²² First, according to the FBI, in 2012, Tony Rodham’s, Hillary Clinton’s brother, company obtained a “rare ‘gold exception permit’ (the first issued in 50 years)” from the Haitian government during the same time period in which “billions of U.S. tax dollars had been spent in Haiti, following the Haitian earthquake in 2010.” In this section, the FBI EC also notes that Hillary Clinton traveled to Russia where she “prom[p]ted Russian officials to enter into a \$3.7 billion aircraft purchase with Boeing.”²³ Boeing, just two months later, pledged \$900,000 to the Clinton Foundation.²⁴

My office was also provided with an FBI PowerPoint titled, “Uranium One, et. al. Investigation FBI Little Rock,” which included background information and an investigative timeline on the Uranium One investigation, as well as outlined alleged instances of pay to play schemes involving the Clinton Foundation and Bangladesh, Taiwan, Abu Dhabi, Digicel, and VCS Mining, among others.²⁵ According to the records, part of the justification for opening the Uranium One investigation was an intelligence memo which included “information received from several bank Suspicious Activity Reports (SARs).”²⁶ The records also appear to indicate that, as part of the Uranium One investigative activity, in December 2017 and January 2018, the FBI interviewed Andrew Kessel, Mike Considine, a former FBI confidential human source (CHS), Jose Fernandez, and Doug Band.²⁷

The interview notes contained in the PowerPoint regarding the interview of Doug Band appear consistent with the FBI EC opened years earlier. The interview notes state that Band believed “he traveled with former President Clinton and Tim Phillips to Kazakhstan” in 2005.²⁸ The interview notes from the PowerPoint

¹⁵ Exhibit 1 at 4.

¹⁶ *Id.* at 4-7.

¹⁷ *Id.* at 23, 41-43.

¹⁸ Exhibit 1 at 7-8.

¹⁹ *Id.*

²⁰ *Id.*

²¹ *Id.*

²² *Id.* at 8-9.

²³ *Id.*

²⁴ *Id.*

²⁵ *Id.* at 13-56.

²⁶ *Id.* at 28.

²⁷ *Id.* at 32-37.

²⁸ *Id.* at 37.

also indicate that “[f]ormer President Clinton met Kazakhstan President Nursultan Nazarbayev during the trip.²⁹ Frank Giustra and Band were present during the meeting.”³⁰ The FBI EC stated that “Bill Clinton and Giustra were reported to have traveled to Kazakhstan together in September 2005 to meet with President Nursultan Nazarbayev. The visit was facilitated in part by Russian businessman Sergei Kurzin. Kurzin helped Giustra form a new company called UrAsia Energy to compete for a Kazakh uranium mine deal.”³¹ Despite having allegedly no history in the uranium business, UrAsia Energy was reportedly awarded mining deals and uranium assets by Kazakhstan.³² UrAsia Energy eventually merged with UraniumOne, which was then purchased by ARMZ, a subsidiary of Russia’s state-owned energy corporation, Rosatom.

According to the FBI PowerPoint slide “Preliminary Findings (Jan 2018),” the FBI stated “no evidence found to date revealing influence towards the U.O. acquisition”; however, according to additional emails and records provided to my office, substantial investigative steps were taken and outstanding investigative requests remained as late as March 2020—over two years after these preliminary findings.³³ Accordingly, I’m seeking additional information on this matter to understand the full scope of what was done and found.

For example, according to a June 1, 2018, email—five months after the FBI’s preliminary findings—from Jonathan Ross, First Assistant United States Attorney (FAUSA) for the Eastern District of Arkansas, to Cody Hiland, United States Attorney (AUSA) for the Eastern District of Arkansas, FBI Little Rock (LR) had obtained “17 302s (Reports of Investigation),” as well as “9 Intelligence Summaries.”³⁴ The majority of these 302 reports, according to FAUSA Ross, “pertain directly to the Uranium One component of the investigation, which as we have previously discussed, is actually NOT time barred by a statute of limitations...”³⁵ The email also states that, “[a]nalysis of these records is ongoing. No estimate on the date of completion.”³⁶ According to FAUSA Ross, “the intelligence summary regarding Uranium One aka U/O fails to account for the dynamic related to possible deliberately false misrepresentations/false statements that may have been made by U/O officials to C.F.I.U.S. to induce the authorization sought to sell U/O to Rosatom.”³⁷ These apparent failures to account for potential false information related to the Uranium One investigation echo many of the concerns I previously raised about CFIUS’s approval of the Uranium One transaction.³⁸

FAUSA Ross goes on to state on June 1, 2018, that,

In my opinion there are remaining investigative tasks that should be completed regarding making a final assessment of the U/O matter. To include possible interviews with Mr. G[iu]stra, Mr. Telfer, Mr. Campbell, the foreign nationals specifically identified by as having made statements concerning the attempts to use the Foundation as a vehicle to influence the Secretary of State, the career official at the State Department that Undersecretary Fernandez communicated with prior to voting to approve the transaction, and officials at DOE that approved the export

²⁹ *Id.*

³⁰ *Id.*

³¹ *Id.* at 37, 4-5.

³² *Id.* 4-5.

³³ *Id.* at 57-85. (emphasis added)

³⁴ *Id.* at 57.

³⁵ *Id.*

³⁶ *Id.* (emphasis added)

³⁷ *Id.* at 58.

³⁸ Letter from Senator Charles E. Grassley, Chairman, Senate Committee on the Judiciary, to the Departments of Justice, State, and Treasury (Jun. 30, 2015), https://www.grassley.senate.gov/sites/default/files/news/upload/CEG%20to%20DOJ%20%28CFIUS%20%2B%20Uranium%29%2C%206-30-15_0.pdf; Letter from Senator Charles E. Grassley, Chairman, Senate Committee on the Judiciary, to the Departments of Justice, State, Treasury, Commerce, Defense, Energy, Homeland Security, Director of National Intelligence, United States Trade Representative, Office of Science and Technology Policy (Oct. 12, 2017), <https://www.grassley.senate.gov/sites/default/files/constituents/20171012%20CEG%20to%20DOJ%20%28Uranium%20One%20Follow%20up%29.pdf>.

authorization for the trucking firm owned and operated by Rosatom after C.F.I.U.S. approval of the U/O acquisition.³⁹

Moreover, the email from FAUSA Ross to AUSA Hiland also provided a description of the intelligence summaries not pertaining to Uranium One, as well as the need for “some additional investigative actions” regarding the alleged schemes related to other matters.⁴⁰

Description of the remaining Intelligence Summaries:

1. S Daniel Abraham Center for Mideast Peace – significant Foundation donor who attempted to gain access to the Secretary of State regarding his viewpoints concerning Middle East issues
2. Magna International – reversal of Russian owned bank [REDACTED] attempted acquisition of Opel (form GM)
3. Guistra and the Colombian Free Trade Agreement – Reversal of HRC’s previous stance of the agreement after Guistra donations to Foundation
4. Abu Dhabi Preclearance Facility – Etihad Airlines’ influence with DHS and CBP to obtain a preclearance facility in Abu Dhabi, United Arab Emirates after paying for several speeches to WJC (\$1.425 million) and to be honorary chairman of GEMS Education Group (\$5.6 million from 2011-2015)
5. Boeing – obtaining substantial contracts after donations to Foundation
6. VC Mining in Haiti – obtaining contracts and licenses to mine in Haiti after donations to Foundation
7. Digicel-Haiti – obtaining increased market share pursuant to favorable government treatment after donations to Foundation after 2010 Earthquake.

My office was also provided with a March 6, 2020, FBI Criminal Investigative Division (CID) “Investigative Update” memorandum, which included a timeline, as well as the status of requests made by the FBI which remained outstanding.⁴¹ The memorandum shows that as of March 6, 2020, over two years after the FBI’s preliminary findings, that it had three “Pending Initial Requests” and three “Pending Additional Requests.”⁴²

The first outstanding “Pending Initial Request[]” from March 6, 2020, related to the Abu Dhabi preclearance facility matter.⁴³ The second was to related Uranium One and outstanding requests for “interviews with Mr. G[iu]stra, Mr. Telfer, Mr. William Campbell; the foreign nationals specifically identified by as having made statements concerning the attempts to use the Foundation as a vehicle to influence the Secretary of State; the career official at the State Department that Undersecretary Fernandez communicated with prior to voting to approve the transactions before CFIUS; and officials at DOE that approved the export authorization for the trucking firm owned and operated by Rosatom after C.F.I.U.S. approval of the U/O acquisition.”⁴⁴ The final outstanding request involved search warrants for the “Weiner device” and “Clinton Foundation servers” to obtain “communications between Mr. Band and others at the Clinton Foundation that were coordinating

³⁹ *Id.* at 59. (emphasis added)

⁴⁰ *Id.* at 59-60. (emphasis added)

⁴¹ *Id.* at 63-85.

⁴² *Id.* at 64.

⁴³ *Id.*

⁴⁴ *Id.* at 66.

meetings with State Department employees and Foundation donors after apparent gifts/donations to the Clinton Foundation.”⁴⁵

The three outstanding “Pending Additional Requests” from March 6, 2020, were related to a request from the Eastern District of Arkansas to FBI to search their holdings for “materials seized from the Pagliano server,” a question regarding the status of a review of 14,000 emails that were turned over by the State Department as part of a tranche of 17,000 emails that “were found by the Mid Year investigators that had not been turned over by Mrs. Clinton’s lawyers...,” and a review of ethics and conflicts of interest documentation for Cheryl Mills and Huma Abedin from the State Department.⁴⁶

Based on the information provided to my office, the outcome of these investigative matters is unclear, as well as the outcome of the investigations into the additional allegations raised by the FBI. As such, I am requesting DOJ and FBI provide answers to the following no later than May 11, 2026:

1. Provide all SARs reviewed, produced, and associated with the FBI’s Clinton Foundation/Uranium One investigation.
2. Provide all 302s and Intelligence Summaries produced as part of the FBI’s Clinton Foundation/Uranium One investigation.
3. What was the outcome of the Uranium One investigation, as well as the outcome for the additional pay to play allegations raised in Exhibit 1? Provide all records.⁴⁷
4. Provide all transcripts of interviews conducted as part of the FBI’s Clinton Foundation/Uranium One investigation.
5. Provide all emails and records in Exhibit 1, as well as those records produced in conjunction with requests in Questions 1-4, in an unredacted format.

Thank you for your prompt review and response. If you have any questions, please contact Tucker Akin of Chairman Grassley’s staff at (202) 224-5225.

Sincerely,



Charles E. Grassley
Chairman
Committee on the Judiciary

⁴⁵ *Id.* at 68.

⁴⁶ *Id.* at 68-70.

⁴⁷ “Records” include any written, recorded, or graphic material of any kind, including letters, memoranda, reports, notes, electronic data (emails, email attachments, and any other electronically created or stored information), calendar entries, inter-office communications, meeting minutes, phone/voice mail or recordings/records of verbal communications, and drafts (whether they resulted in final documents.”).

58A-WF-[REDACTED] Serial [REDACTED]

FD-1057 (Rev. 5-8-10)

UNCLASSIFIED//FOUO

FEDERAL BUREAU OF INVESTIGATION

Electronic Communication

Title: (U//FOUO) To Open a Preliminary
Investigation on the Bill, Hillary and
Chelsea Clinton Foundation.

Date: 01/29/2016

CC: [REDACTED]

From: WASHINGTON FIELD

Contact: [REDACTED], [REDACTED]

Approved By: [REDACTED]

Drafted By: [REDACTED]

Case ID #: 58A-WF-[REDACTED]

(U//FOUO) THE BILL, HILLARY AND CHELSEA
CLINTON FOUNDATION;
UNSUB(S);
SENSITIVE INVESTIGATIVE MATTER

Synopsis: (U//FOUO) To open a Preliminary Investigation of the Bill, Hillary and Chelsea Foundation regarding its alleged use by foreign entities to corruptly influence decisions or actions on questions or matters, causes or proceedings before the U.S. State Department.

Preliminary Investigation Initiated: 01/29/2016, set to expire
07/29/2016

Package Copy: (U//FOUO) Letterhead memorandum (LHM) for dissemination.

Enclosure(s): Enclosed are the following items:

1. (U//FOUO) LHM

Details:

Background

UNCLASSIFIED//FOUO

[REDACTED]

58A-WF **Serial**

UNCLASSIFIED//FOUO

Title: (U//FOUO) To Open a Preliminary Investigation on the Bill, Hillary and Chelsea Clinton Foundation.

Re: 58A-WF- 01/29/2016

By way of background, William Jefferson "Bill" Clinton served as the 42nd President of the United States from 1993 until 2001. Hillary Rodham Clinton served as the Secretary of State from 2009 through 2013. Prior to that, she was elected to the Senate twice from New York. In 2001, after his second term, Bill Clinton founded the William J. Clinton Foundation. Hillary Clinton first joined The William J. Clinton Foundation after leaving the State Department in 2013, and the organization has since been referred to as the Bill, Hillary & Chelsea Clinton Foundation. The Foundation is non-profit organization with the stated mission to "strengthen the capacity of people throughout the world to meet the challenges of global interdependence." The Foundation has offices in New York City and Little Rock, Arkansas and works with individuals, organizations, corporations and governments. The Foundation has a staff of approximately 350. A February 18, 2015 Washington Post article reported The Foundation raised almost \$2 billion dollars since its creation in 2001. The money is generated from foreign governments, political donors, corporate figures, and other wealthy entities.

Throughout 2015, Washington Field received information through public sources that The Foundation may have been used as a vehicle by foreign entities to corruptly influence decisions or actions on questions or matters, causes or proceedings pending before the U.S. State Department. In 2015 author Peter Schweizer, in the book "Clinton Cash: The Untold Story of How and Why Foreign Governments and Businesses Helped Make Bill and Hillary Rich," and others reported on donations made to The Foundation by foreign entities. The reporting documented a pattern of financial transactions that involved The Foundation, and Bill and Hillary Clinton that allegedly took place concurrently with U.S. policy decisions favoring the entities that provided funds for the transactions.

The Memorandum of Understanding

UNCLASSIFIED//FOUO

58A-WF- [REDACTED] Serial [REDACTED]

UNCLASSIFIED//FOUO

Title: (U//FOUO) To Open a Preliminary Investigation on the Bill, Hillary and Chelsea Clinton Foundation.

Re: 58A-WF-[REDACTED], 01/29/2016

Prior to becoming the Secretary of State, Hillary Clinton was required by the White House to sign a Memorandum of Understanding (MOU). The purpose of the MOU was ostensibly to address foreign influence concerns that could arise from speaking fees and donations to the Foundation. The MOU set limits on the activities on The Foundation. For example, the MOU required The Foundation to publicly disclose all its contributors. The Clinton Foundation has several components, including the Clinton Global Initiative (CGI) and the Clinton Giustra Enterprise Partnership (CGEP), formerly known as the Clinton Giustra Sustainable Growth Initiative (CGSGI).

In several instances, The Foundation failed to comply with the MOU, for example:

Hillary and Bill Clinton failed to disclose four foreign donations totaling \$2.35 million that were given by Ian Telfer, the then-head of the Russian government's uranium company, Uranium One (discussed later). The Clintons received Telfer's money (via the Fernwood Foundation) at a time the Russian company had lucrative business pending before the State Department. The memorandum of understanding makes it clear that the donor-disclosure requirement applies to each part of the foundation. The hidden donations appear to be clear violations of the MOU Hillary Clinton signed with the Obama administration wherein she promised and agreed to publicly disclose all donations during her tenure.

Polo Resources

An April 22, 2014 Wall Street Journal (WSJ) article entitled, "Gifts to Hillary Clinton's Family Charity Are Scrutinized in Wake of Book," describes findings that agree with Schweizer's reporting about a "hidden" foreign donation of two million shares in Polo Resources made

UNCLASSIFIED//FOUO



58A-WF- [REDACTED] Serial [REDACTED]

UNCLASSIFIED//FOUO

Title: (U//FOUO) To Open a Preliminary Investigation on the Bill, Hillary and Chelsea Clinton Foundation.

Re: 58A-WF-[REDACTED], 01/29/2016

to the Clinton Foundation by Stephen Dattels, a Canadian mining executive. The value of the shares at the time of the donation was about \$40,000. In a State Department cable, made public by Wikileaks, about eight weeks after the donation was made, James Moriarty, U.S. Ambassador to Bangladesh, persuaded the energy adviser to the Prime Minister of Bangladesh to reauthorize the opening of mines, including Phulbari Mines to pit mining. Polo Research had a financial interest in the Phulbari mines and benefited from the policy decision to open the land to pit mining. The WSJ has since confirmed The Foundation failed to disclose this contribution.

Frank Giustra and Uranium One

Clinton and Frank Giustra established CGSGI as a project of The Foundation to foster economic growth in the developing world. The "Giustra" part of CGSGI refers to billionaire Canadian mining magnate Frank Giustra, a man who pledged \$130 million to The Foundation and whose deals helped transfer U.S. uranium to Russian control, according to the New York Times. Giustra is alleged to have gained wealth from investing in mining stocks in the Canadian stock exchanges. In May 2007, Andy Hoffman reported in a Globe and Mail article entitled, "Renaissance Man," that Giustra gained wealth "through a Byzantine system of shell companies, furtive share purchases and elaborate compensation schemes."

Bill Clinton and Giustra were reported to have traveled to Kazakhstan together in September 2005 to meet with President Nursultan Nazarbayev. The visit was facilitated in part by Russian businessman Sergei Kurzin. Kurzin helped Giustra form a new company called UrAsia Energy to compete for a Kazakh uranium mine deal. Clinton's purported objective on the trip was to assist HIV/AIDS patients obtain greater access to affordable medications. Giustra was allegedly in the country to close a uranium business deal and was relying on Bill Clinton to give him entrée to President Nazarbayev.

UNCLASSIFIED//FOUO

[REDACTED]

58A-WF- [REDACTED] Serial [REDACTED]

UNCLASSIFIED//FOUO

Title: (U//FOUO) To Open a Preliminary Investigation on the Bill, Hillary and Chelsea Clinton Foundation.

Re: 58A-WF-[REDACTED], 01/29/2016

It has been reported that mining concessions in Kazakhstan are extremely competitive and that UrAsia Energy had no history in the uranium business. This lack of a track record would have hindered most companies from being awarded the lucrative deal in Kazakhstan. There are conflicting reports on the role Bill Clinton and President Nazarbayev played in UrAsia Energy eventually winning rights to the uranium assets. Bill Clinton has publicly stated that the mining deals he helped secure for UrAsia Energy were negotiated with private companies not the Kazakh government. Hoffman reported in a Globe and Mail article, dated May 27, 2009 entitled, "Uranium One Ensnarled in Kazakh Scandal," that "When you do a transaction in Kazakhstan, you need the government's approval. UrAsia got the approval, and when UrAsia Energy merged with Uranium One, that approval was given again." Media reports indicate Bill Clinton may have actively engaged Kazakhstan officials to help UrAsia Energy win the contract. Clinton has denied these reports.

Key to the approval of the UrAsia Energy deal was Mukhtar Dzhakishev, the president of the Kazakh government agency responsible for running Kazakhstan's uranium and nuclear energy industry. Dzhakishev may have been involved in negotiations with Giustra and Clinton on the uranium deal. On February 24, 2010, the Washington Post article entitled, "Clinton Advisor Intervened with Uranium Deal," reported that:

"Dzhakishev and others had been pressured for months to close the uranium deal with Giustra. Schweizer reported, "In a 2009 video of a statement to authorities on an unrelated matter, Dzhakishev claimed that then Senator Hillary Clinton pressured Kazakh officials to secure the deal for the Canadians. According to Dzhakishev, Kazakh Prime Minister Karim Massimov was in America and needed to meet with Hillary Clinton but this meeting was cancelled. And they said that those

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[REDACTED]

58A-WF- Serial

UNCLASSIFIED//FOUO

Title: (U//FOUO) To Open a Preliminary Investigation on the Bill, Hillary and Chelsea Clinton Foundation.

Re: [REDACTED]

investors connected with the Clintons who were working in Kazakhstan have problems. Until Kazakhstan solved those problems, there would be no meeting..."

It was also reported that Dzhakishev claimed he was contacted by Bill Clinton advisor Tim Phillips who told him there would no meetings with Hillary Clinton until the Giustra deal was approved.

In the months after the UrAsia Energy deal was approved, Giustra reportedly gave The Foundation \$31 million, the first of several large donations he would make as he went on to secure other lucrative natural resources deals.

In 2007, shareholders approved the merger between UrAsia Energy and Uranium One in a reverse merger. Giustra and his associates would control about 60 percent of Uranium One. Thereafter, Uranium One quickly began to acquire uranium assets in the United States. One of Uranium One's last deals involved uranium mines in Wyoming and required approval of a U.S. Government committee, which included the U.S. State Department.

In or about 2008, Uranium One began negotiations with the Russian State Nuclear Agency, which eventually purchased a minority stake in the company in 2009. After these series of deals, Uranium One was sold to Rosatom (the Russian atomic energy agency). The Russian purchase of Uranium One had to be approved by CFIUS, of which Hillary Clinton was a member. CFIUS is an inter-agency committee of the U.S. Government that is authorized to review, investigate and block any transaction or investment that could result in the control of any U.S. businesses or assets by a foreign person that may raise national security concerns, or involve critical infrastructure. On October 22, 2010 the Russian purchase of Uranium One was approved by CFIUS, with the approval of

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58A-WF- [REDACTED] Serial [REDACTED]**UNCLASSIFIED//FOUO**

Title: (U//FOUO) To Open a Preliminary Investigation on the Bill, Hillary and Chelsea Clinton Foundation.

Re: 58A-WF-[REDACTED] 01/29/2016

Secretary Clinton. Since the sale, Giustra has allegedly pledged donations totaling \$100 million to The Foundation.

Free Trade Agreement with Colombia

In 2010, a U.S. - Colombian free trade agreement was being considered in Congress. The agreement was supported by the Administration and Hillary Clinton stated she would actively lobby Congress to pass the legislation.

In June 2010, Bill Clinton met Giustra in Columbia. Giustra was invested in oil, natural gas, coal and timber in the country. Hillary Clinton visited Columbia during the same period to conduct meetings with Colombian president Alvaro Uribe. It has been reported Bill Clinton met with President Uribe hours before the meeting between Uribe and Hillary. After these meetings, several businesses associated with Giustra won favorable rulings from Uribe's administration.

A few days after the meetings, Prima Columbia Properties (PCP) announced it had acquired valuable timber concessions from the government. Giustra had a financial interest in PCP through a shell company named Flagship Industries.

During the same time period, Pacific Rubiales Energy received the right to drill for oil in six valuable areas. Specifically, Pacific Rubiales acquired oil blocks in the Putumayo Basin, Ciusiana-Cupiagua, and the Llanos Basin. Giustra had a financial interest in Pacific Rubiales Energy. Like UrAsia Energy, Pacific Rubiales was a new company with little experience conducting business in the country. Pacific Rubiales allegedly contributed \$4 million to CGSGI, which passed the majority of money directly to The Foundation.

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[REDACTED]

58A-WF-[REDACTED] Serial [REDACTED]

UNCLASSIFIED//FOUO

Title: (U//FOUO) To Open a Preliminary Investigation on the Bill, Hillary and Chelsea Clinton Foundation.

Re: 58A-WF-[REDACTED], 01/29/2016

Petroamerica, another company with ties to Giustra won a designation from the Colombian government that allowed it to explore for and produce oil.

Finally, Numerous projects involving Giustra have received financing through the Export-Import Bank (Ex-Im) and the U.S. Trade and Development Agency (TDA). It is unknown if Hillary Clinton directly or indirectly lobbied on behalf of Giustra before Ex-Im or TDA in support of U.S. taxpayer financing for Giustra projects.

The U.S.-Colombia Trade Promotion Agreement took effect on May 15, 2012.

Re-Filing of Tax Returns

According to [REDACTED] article, "Exclusive: Clinton charities will re-file tax returns, audit for other errors," published on April 23, 2015, in Reuters, The Foundation did not report some foreign donations in its federal tax filing of 2010, 2011 and 2012. Consequently, charities run by the Clintons are in the process of re-filing at least five annual federal tax returns.

Miscellaneous Information

Tony Rodham, the brother of Hillary Clinton, was a member of the board of a North Carolina mining company when, in 2012, the company obtained a rare "gold exception permit" (the first issued in 50 years) from the government of Haiti. During that period, billions of U.S. tax dollars had been spent in Haiti, following the Haitian earthquake in 2010.

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58A-WF- [REDACTED] Serial [REDACTED]

UNCLASSIFIED//FOUO

Title: (U//FOUO) To Open a Preliminary Investigation on the Bill, Hillary and Chelsea Clinton Foundation.

Re: 58A-WF-[REDACTED], 01/29/2016

In 2009, Hillary traveled to Russia, where she promoted Russian officials to enter into a \$3.7 billion aircraft purchase with Boeing. Two months after the business agreement, Boeing pledged \$900,000 to The Foundation.

Prosecutorial Opinion

AUSA Michael Atkinson, U.S. Attorney's Office for the District of Columbia (USAO-DC) and Ray Hulser, Public Integrity Section (PIN), DOJ have been briefed on the facts and circumstances to support the initiation of a Preliminary Investigation. The USAO-DC is in the process of reviewing allegations concerning The Foundation and are prepared to offer a prosecutorial opinion on or before January 29, 2015. DOJ/PIN will withhold issuing a prosecutorial opinion on this matter until the case is presented to DOJ by FBIHQ.

Statement of Requisite Level of Predication

Based on the above information, there is an allegation or information indicative of possible criminal activity being committed by the case subjects sufficient to support the opening of a preliminary investigation.

Subjects

The Bill, Hillary and Chelsea Clinton Foundation

[REDACTED]

[REDACTED]

Frank Giustra

[REDACTED]

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[REDACTED]

58A-WF- [REDACTED] Serial [REDACTED]

UNCLASSIFIED//FOUO

Title: (U//FOUO) To Open a Preliminary Investigation on the Bill, Hillary and Chelsea Clinton Foundation.

Re: 58A-WF-[REDACTED], 01/29/2016

Initial Investigative Plan

No overt investigative steps should be taken that would likely compromise the existence of this investigation during the period Hillary Clinton is a candidate for Presidential office. The use of such techniques to include interviews, search warrants, subpoenas or other methods that would expose this investigation and could then negatively impact the election will be delayed until Hillary Clinton is elected POTUS or is eliminated during the primary or general election.

Covert Phase (During the period HRC is a Domestic Political Candidate):

1. Continue to collect available open source information to corroborate evidence.
2. Review [REDACTED] and [REDACTED] databases.
3. Conduct a review of [REDACTED] materials.
4. Leverage relationship the U.S. State Department and attempt to review relevant documents to identify official acts to include:
 - a. Email Review
 - b. Review Travel and Meeting schedules
 - c. Review official correspondence
 - d. Lobbying Efforts by State Dept. officials related to trade deal.
5. Review pertinent IC community records.
6. Review the congressional record for official acts.
7. Leverage information and sources generated from pending PC case (58D-WF-[REDACTED]) to enhance The Foundation investigation.
 - a. Peter O'Keefe - served as the Finance Director for the WJC Presidential Foundation, and Director of Major Donor Development.
 - b. Doug Band was former Chief Advisor to Pres. Clinton, and was Director of the Foundation and the Clinton Global Initiative (which operated as a separate entity from 2010-2013).
 - c. Governor Terence McAuliffe was a Director of the Foundation.

Overt Phase: (To begin when HRC is no longer a Domestic Political Candidate):

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58A-WF- [REDACTED] Serial [REDACTED]

UNCLASSIFIED//FOUO

Title: (U//FOUO) To Open a Preliminary Investigation on the Bill, Hillary and Chelsea Clinton Foundation.

Re: 58A-WF-[REDACTED], 01/29/2016

1. Subpoena financial and business records from the The Foundation.
2. Subpoena financial records from relevant banks/financial institutions.
3. Subpoena Fedwire
4. Obtain IRS records
5. MLATs to Canada, Kazakhstan, Columbia and other countries requesting records of meetings, correspondence, and other relevant materials.
6. Potential interviews (preliminary):
 - a. Cheryl Mills, Counselor and Chief of Staff to Secretary Clinton and Foundation employee
 - b. Huma Abedin, State Dept. employee and Foundation employee
 - c. Doug Band, Teneo founder and former Foundation employee
 - d. Caitlin Klevorick, Special Assistant to Cheryl Mills and Foundation employee
 - e. Tim Phillips, Former Advisor to Bill Clinton
 - f. Stephen Dattels, Polo Resources
 - g. Dennis Cheng, Deputy Chief of Protocol and former Clinton political operative
 - h. Fran Giustra , UrAsia Energy et. al.
 - i. Business Associates of Giustra: Frank Holmes, Neil Woodyer, Robert Disbrow, Paul Reynolds, Robert Cross, Egizio Bianchini, Sergei Kurzin, and Ian Telfer.
 - j. Mukhtar Dzhakishev, former president of Kazatomprom
 - k. Paul Lewis Clarke, former senior VP of Uranium One

Washington Field has a pending full field matter (58D-WF-[REDACTED]) with involving individuals previously associated with The Foundation. It is anticipated these individuals and others not identified here will have information useful to the investigation of The Foundation. Washington Field will leverage subject/witness/CHS generated information to enhance The Foundation case. The following individuals will be interviewed on 58D-WF-[REDACTED]

Governor Terence McAuliffe - served as Director of the Foundation.

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58A-WF-6930742 Serial 1

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Title: (U//FOUO) To Open a Preliminary Investigation on the Bill, Hillary and Chelsea Clinton Foundation.

Re: 58A-WF-[REDACTED] 01/29/2016

Peter O'Keefe - served as the Finance Director for the WJC Presidential Foundation, and Director of Major Donor Development.

Doug Band - served as former Chief Advisor to President Clinton, and later Director of the Foundation and the Clinton Global Initiative (which operated as a separate entity from 2010-2013).

Possible Violations

Possible criminal violations based on the allegations and facts established to date, include the following:

- 18 USC §201 (Bribery of Public Officials)
- 18 USC §207 (Restrictions on former officers, employees, and elected officials of the Executive and Legislative branches)
- 18 USC §208 (Acts Affecting a Personal Financial Interest)
- 18 USC §1956 (Laundering of monetary instruments)

Sensitive Investigative Matter

The proposed investigation is a Sensitive Investigative Matter. Per [REDACTED], this matter involves a Domestic Political Candidate and at the time of the alleged activity, a domestic public official in a senior executive position.

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Uranium One, et al. Investigation

FBI Little Rock

UNCLASSIFIED/ [REDACTED]

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Legal Framework

- The information contained in this presentation is preliminary and not final. As this is an ongoing investigation, facts, assumptions, and conclusions contained in this presentation are subject to change, modification, and revision as additional facts and evidence are gathered.

➤

[REDACTED]

➤

[REDACTED]

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Initial Allegations

- Investigation initiated to determine if Mrs. Clinton exercised her influence, as Secretary of State, in the approval process of Uranium One (U.O.) acquisition by a Russian owned company
- Large donations were made to the Clinton Foundation throughout the acquisition process by several who stood to, and did, benefit greatly as a result of the successful U.O. sale

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UNCLASSIFIED/ [REDACTED]

Initial Allegations

- The acquisition of U.O. took place over three transactions from 2009 to 2013
- This corresponds with the same time Hillary Clinton was Secretary of State
- Possible violations of Title 18 USC 1343 (Wire Fraud) and Title 18 USC 201 (Bribery of Public Officials), all with a five year statute of limitations

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UNCLASSIFIED/ [REDACTED]

US Persons Involved

- **Hillary Rodham Clinton** – U.S. Secretary of State (January 29, 2009 – February 1, 2013)
- **William Jefferson Clinton** – former US President and Chairman of the Clinton Foundation
- **Tim Phillips** – former advisor to President Clinton and senior advisor to the Clinton Foundation in 2005
- **Doug Band** – close associate of the Clinton's and one who has intimate knowledge of the Foundation
- **Jose Fernandez** – former Assistant Secretary for Economic and Business Affairs at the Department of State



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UNCLASSIFIED/ [REDACTED]

Non US persons Involved

- **Muhktar Dzhakieshev** – head of Kazatomprom, Kazakhstan's state nuclear agency, when original deal with UrAsia was signed. Arrested on or about May 21, 2009 on suspicion of stealing state property.
- **Mukhtar Ablayazov** – was founder and chairman of the board of directors for BTA, a Kazakhstan bank; friends with Dzhakishev
- **Frank Giustra** – Canadian with ties to UrAsia/Uranium One and Clinton Foundation; Clinton Foundation donor
- **Ian Telfer** – Canadian with ties to UrAsia/Uranium One; suspected Clinton Foundation donor

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Committee on Foreign Investment in the United States (CFIUS)

- Inter-agency of the U.S. government that reviews the national security implications of foreign investments in U.S. companies or operations.
- Composition of CFIUS
 - Department of Treasury – Chair
 - Department of Justice
 - Department of Homeland Security
 - Department of Commerce
 - Department of Defense
 - Department of State
 - Department of Energy
 - Office of the U.S. Trade Representative
 - Office of Science & Technology Policy

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Kazakhstan – 2005

- Washington Post article dated February 2010, based off Mukhtar Dzhakieshev recorded interview

Mukhtar Dzhakieshev:

- Former chief of Kazakhstan's state nuclear firm Kazatomprom
- Arrested in May 2009 by the Government of Kazakhstan for embezzlement and bribery
- Convicted in 2010 for the aforementioned charges
- Convicted in 2012 for selling strategic uranium resources to foreign investors
- Made the allegation during an interview while he was being held in prison and before being sentenced on March 12, 2010

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Kazakhstan – 2005

- Information related to Kazakhstan criminal investigations

Mukhtar Ablayazov:

- Former head of BTA Bank in Kazakhstan
- Ablayazov and Dzhakieshev were college roommates, according to Legat Astana
- Ablayazov convicted in Kazakhstan for one of the largest fraud schemes in the world and currently in exile
 - Ablayazov created a loan department with in his own bank in which he alone had oversight. He then loaned billions of dollars to shell companies attributed to himself that ultimately defaulted
- FBI NY is currently assisting Kazakh authorities with this investigation which may be the largest fraud in the world

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ROSATOM

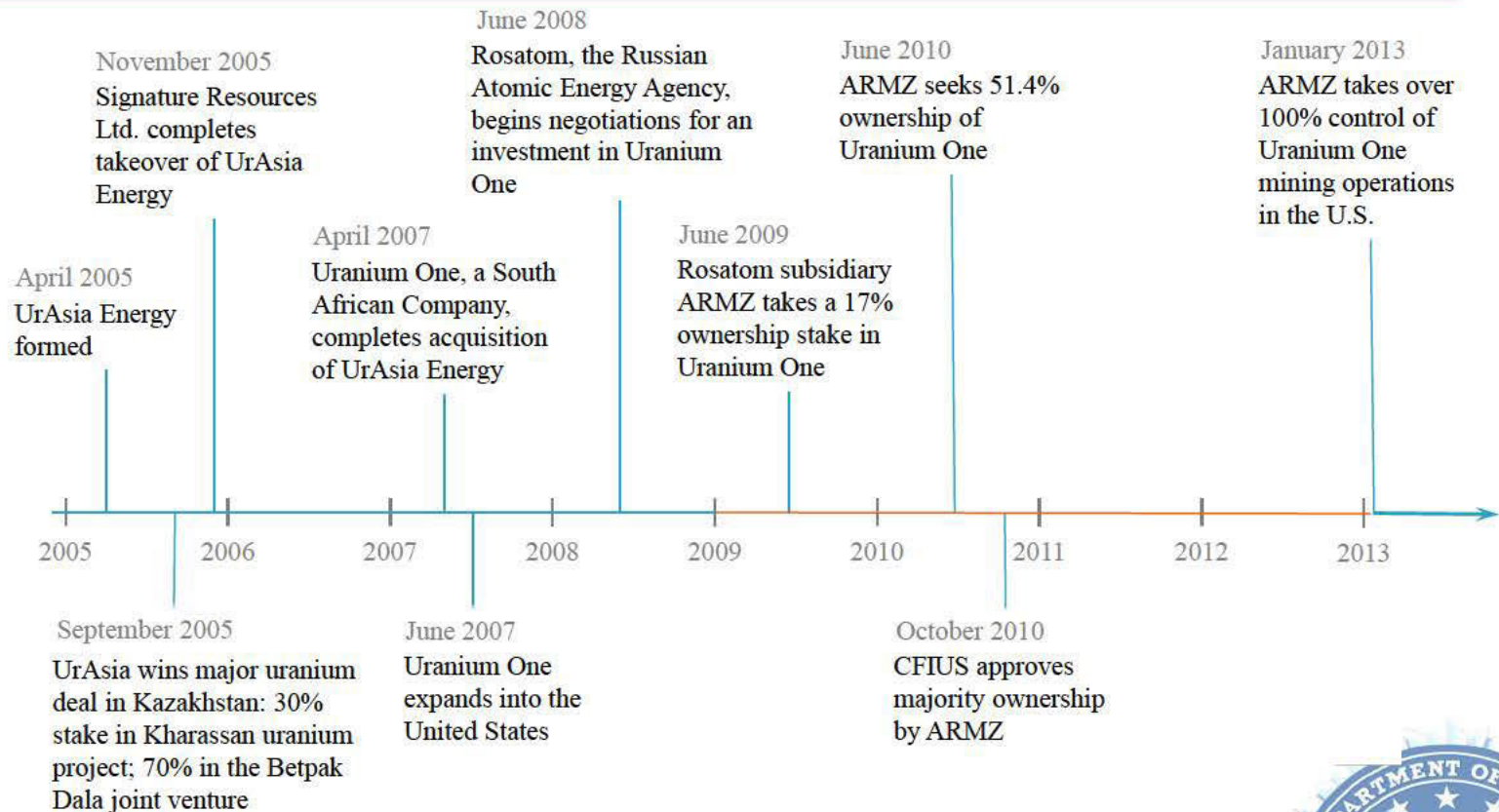
- Russian state owned nuclear energy company, with several subsidiary companies to include Tenex and ARMZ
- ROSATOM was given expansive powers unlike other Russian Ministries through Putin
- TENEX group included Alexander v. Markin, first deputy general director, Sergey Polgorodnik, head of uranium products sales and marketing directorate, and Vadim e. Mikerin

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ARMZ Takeover of Uranium One



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The Clinton Foundation

- The Bill, Hillary, and Chelsea Clinton Foundation is a 501(c)3 non-profit organization incorporated in Arkansas
- Initially filed with state in 1997 but did not formally start as a foundation until 2001
- Per Foundation, donor relations, donation processing, member services, accounting operations, and other finance and control operations are conducted in Little Rock

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UNCLASSIFIED/ [REDACTED]

The Clinton Foundation

- The Clinton Foundation also does business as the following, among others:
 - Clinton Climate Initiative
 - Clinton Foundation
 - Clinton Foundation HIV/AIDS Initiative
 - Clinton Guistra Enterprise Partnership
 - Clinton Guistra Sustainable Growth Initiative
 - Clinton Global Initiative
 - Clinton Health Matters Initiative
 - Too Small to Fall
 - William J. Clinton Foundation

UNCLASSIFIED/ [REDACTED]



UNCLASSIFIED/ [REDACTED]

Uranium One Americas

- Uranium One is owned by State Atomic Energy Corporation Rosatom (Rosatom), the Russian Federations national nuclear corporation.
- Uranium One Americas is primarily engaged in the operation of the Willow Creek uranium mine located in Wyoming, and in the exploration and development of uranium properties in the western United States.

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UNCLASSIFIED/ [REDACTED]

Investigative Steps

UNCLASSIFIED/ [REDACTED]

Justification for opening case

- January 2016 FBI LR FIG produced an intelligence memo based on information received from several bank Suspicious Activity Reports (SARs)
 - Some SAR information was derived from open source;
 - SAR stated the uranium industry and a federal public official(s) may have participated in a flow of benefits scheme in which large monetary contributions were made to a non-profit, under both direct and indirect control of the federal public official (Hillary Clinton);



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Investigation Timeline

- **January 21, 2016** – Meeting at FBIHQ, chaired by EAD Coleman;
- **January 27, 2016** – LR opened initial investigation, after consultation with USAO, with caveats from FBIHQ;
- **August 1, 2016** – SVTC (Secure Video Teleconference) with FBIHQ, other involved offices and LR was advised to close investigation with direction FBI NY would be the sole division responsible for the investigation;
- **August 1, 2016** – LR received an email from FBIHQ directing LR to close its case as discussed on the SVTC;
- **August 9, 2016** – LR officially closed the investigation;

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Investigation Timeline

- **January 11, 2017** –LR provided brief to ADD Bowdich;
- **January 17, 2017** – ADD Bowdich directed [REDACTED], Counsel to the Director, to conduct an in-depth 30 day review of the Clinton Foundation investigation to make a recommendation on a way forward;
- **January 17–23, 2017** – Multiple LR contacts with [REDACTED];
- **July 14, 2017** – LR reopened their investigation;
- **August 30, 2017** – SVTC between LR and ADD Bowdich where case was discussed but interviews were not approved;

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Investigation Timeline

- **September 14, 2017** – FBI NY closed their investigation;
- **November 3, 2017** – Meeting with LR SAC and USAO where SAC advised the ADD and EAD must give approval for interviews prior to them taking place – USAO advised they would have to go through DOJ for simultaneous approvals;
- **November 9, 2017** – USA for Eastern District of Arkansas initially provided concurrence for interviews of legislators but then asked LR to hold off as he had a few more meetings in DC;
- **December 2017** – Little Rock approved to conduct interviews of Kessel, [REDACTED], Band, and Fernandez

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UNCLASSIFIED/ [REDACTED]

Investigative Activities

UNCLASSIFIED/ [REDACTED]

[REDACTED]

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Interview of Andrew Kessel

➤ December 1, 2017

- Chief Financial Officer, Clinton Foundation
- Interviewed by MDA Analytics on August 11, 2017
- Denied all claims made by MDA Analytics
- Frustrated at the amount of scrutiny the CF has had
- Advised Sec. Clinton had little to do with Foundation

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Interview of Mike Considine

➤ December 6, 2017

- Special Investigator, U.S. Department of Energy (2009 – present)
- The U.S. Department of Energy was the co-lead on the U.O. transaction
- Signed off at the Deputy Secretary level if lead or co-lead
- The State Department's official who signed off on U.O. was Assistant Secretary of State Jose Fernandez

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Interview of [REDACTED]

➤ December 18, 2017

- Former FBI Confidential Human Source, opened September 10, 2008 and closed on January 21, 2016
- Provided numerous documents to the FBI and to the [REDACTED] committee in 2017
- Acknowledged the [REDACTED]

▪ [REDACTED]

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Interview of Jose Fernandez

➤ December 28, 2017 and January 29, 2018

- Former Assistant Secretary of State for Economic, Energy and Business Affairs, 2009–2013
- Oversaw CFIUS on behalf of the U.S. Department of State
- The U.S. Department of State reviewed CFIUS transactions relative to how it would affect foreign relations
- Approved the transaction on behalf of the U.S. Department of State

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Interview of Doug Band

➤ December 28, 2017

- Former employee of the Clinton Foundation
- In 2005, Band believes he traveled with former President Clinton and Tim Phillips to Kazakhstan
- Former President Clinton met Kazakhstan President Nursultan Nazarbayev during the trip. Frank Giustra and Band were present during the meeting
- His idea to start the Clinton Global Initiative in 2006

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Electronic Communications

E-mail review

- **August 8, 2017** – FBI NY transferred State Department e-mails to FBI LR
- **November 17, 2017** – Initiated an e-mail review of nine U.S. State Department accounts and Hillary Clinton's private server account received from U.S. State Department Office of the Inspector General
 - FBI personnel are reviewing approximately 1.4 million e-mails sent or received between 2009 to 2013, including attachments, from these accounts



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Financial

- **November 7, 2017–** Received financial documentation from FBI LA and FBI NY
- **November 8, 2017 – January 24, 2018 –**
 - [REDACTED]
[REDACTED]
 - Reviewed approximately [REDACTED] [REDACTED] reporting documents

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Financial

- [REDACTED] related to the Clinton Foundation have been scheduled and analyzed
 - Approximate amount of aggregate inflows: [REDACTED]
 - Approximate amount of aggregate outflows: [REDACTED]
 - Approximately [REDACTED] reviewed to date

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Financial

- The Clinton Foundation's website publishes a listing of donors within certain dollar brackets based upon lifetime donation totals. The following is a partial table showing lifetime donation totals as of September 2017:

Name	Donation Range
Clinton Giustra Enterprise Partnership (CGEP) (Canada)	> \$25,000,000
Frank Giustra, Radcliffe Foundation	> \$25,000,000
Robert Disbrow	\$1,000,001 – \$5,000,000
Paul Reynolds	\$1,000,001 – \$5,000,000
Robert Cross	\$100,001 – \$250,000

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Financial

- **Clinton Giustra Enterprise Partnership (CGEP) (Canada)**
- **Per Canada Revenue Agency reporting:**
 - Registered as charitable organization in Canada 12/5/2007
 - Directors: Frank Giustra, David Foley, Bruce Lindsey, and Eric Nonacs

Donations CGEP Reported to the Clinton Foundation

Year	Amount (Canadian Dollars)
2007	not itemized
2008	not itemized
2009	\$8,388,736
2010	\$7,833,900
2011	\$4,698,668
2012	\$4,702,444
2013	\$314,437
2014	\$205,419
2015	\$104,911
Total	\$26,248,515

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Financial

- Donations identified within bank records received to date from Frank Giustra or Canadian foundation from 2005 – 2012

Year	Frank Giustra	CGEP
2005	\$1,000,000	
2006	\$7,344,065	
2007	\$4,145,916	
2008	\$1,000,000	\$4,117,551
2009	\$1,025,000	\$4,343,122
2010		\$540,629
2011		
2012		\$1,294,162

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Preliminary Findings (Jan 2018)

- Through interviews of State Department and Department of Energy personnel to date, regarding the U.O. acquisition, the allegation Sec. Clinton used her influence to ensure the U.O. deal was a success are unsubstantiated.
- Through a review of emails provided by State, no evidence found to date revealing influence towards the U.O. acquisition.
- Financial records are voluminous but without specific information of bribe payments we are unable to show a pay to play scheme.
- As she left office on February 1, 2013, all events occurring during her tenure have passed the statute of limitations for the violations of bribery and wire fraud.

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Additional Allegations

UNCLASSIFIED/ [REDACTED]

[REDACTED]

UNCLASSIFIED/ [REDACTED]

Boeing

- Boeing donated to the Clinton Foundation
 - \$1 to \$5 million (according to open sources)
- Boeing also donated to the U.S. Department of State
 - \$1 million for the World's Fair pavilion
 - \$5 million pledged for the U.S. Diplomacy Center
- Donations made potentially in exchange for favorable government action where Secretary Clinton pressured Russian government to sign a multi-billion dollar contract with Boeing
 - \$3.7 billion Rosavia contract signed in 2010

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Colombia Free Trade Agreement

- Politico reported about a book titled “Clinton Cash: The Untold Story of How and Why Foreign Governments and Businesses Help Make Bill and Hillary Rich,” written by author Peter Schweizer.
- Schweizer alleges that Hillary Clinton’s role as Secretary of State influenced the business interests of Frank Giustra in Colombia, who benefitted from her support of the 2011 Colombia Free Trade Agreement, which she did not support in previous years.
- *CFTA is an agreement between U.S. and Colombia that would eliminate tariffs and barriers to trades in goods and services*

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UNCLASSIFIED/ [REDACTED]

Bangladesh

- In 2011, Secretary Clinton and her staff allegedly pressured the government of Bangladesh, including its Prime Minister, Sheik Hasina, to terminate a corruption investigation into a Clinton Global Initiative (CGI) donor, Dr. Muhammad Yunus (Grameen Bank).
- Reports also indicate that State Department officials threatened the Prime Minister's son, Sajeeb Wazed, with an IRS audit if he did not attempt to get his mother to terminate the investigation.

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UNCLASSIFIED/ [REDACTED]

Taiwan

- Hillary Clinton's campaign put out a statement congratulating the winner of the Taiwanese election in 2008.
 - Terrance McAuliffe, a Clinton Foundation donor, was being paid by the Taiwanese. McAuliffe was included in internal emails discussing the statement.
 - During the same period, two other senators, Barack Obama and John McCain, were also running for president and both also produced statements.
-
- Case was opened to address allegations against Terrance McAuliffe, mostly focusing on the money he received from foreign governments. While there are a few connections to the Clintons, there are not clear or substantiated allegations against them.

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UNCLASSIFIED/ [REDACTED]

Abu Dhabi

- November 3, 2016, FBI receives tip regarding pay to play scheme involving the Clinton Foundation.
 - Alleged World Travel and Tourism Council (WTTC) paid the Clinton Foundation \$500,000 for a speech in Abu Dhabi while the Secretary Clinton approved a pre-screening facility in the Abu Dhabi International Airport (ADIA).
- According to open sources, President Bill Clinton collected \$1 million for two appearances sponsored by the Abu Dhabi government that were arranged while Hillary was secretary of state.
- On December 9, 2014, the Embassy of the UAE donated \$5 million to the Clinton Foundation. The check was deposited on January 7, 2015.

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Abu Dhabi

- December 6, 2011, the government of Abu Dhabi and DHS announced a letter of intent to build a US Customs and Border Protection preclearance facility at Terminal 3 in ADIA
- December 13, 2011, President Clinton received \$500,000 for a speech at the Eye on Earth Summit and Exhibition in Abu Dhabi
- December 2012, President Clinton sought approval for another speech before the WTTC.

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Abu Dhabi

- April 12, 2013, Department of State Circular 175 documentation authorized DHS CBP to finalize an agreement with UAE.
- April 15, 2013, the Government of United Arab Emirates and DHS signed an agreement to open the US Customs and Border Protection pre-clearance facility at Terminal 3 in ADIA.
- April 2013, Bill received \$500,000 for the keynote speech at the WTTC conference in Abu Dhabi.
- January 26, 2014, the US customs pre-clearance facility at Abu Dhabi International Airport officially opened.
- This was the last facility opened prior to Congressional changes mandating US based airlines must have a U.S. carrier agreement with the pre-clearance facility host nation.

UNCLASSIFIED/ [REDACTED]



UNCLASSIFIED/[REDACTED]

Abu Dhabi – Cheryl Mills

- **Cheryl Mills** – served as counselor and Chief of Staff to Secretary Clinton
 - SGE at State with permission to work as an employee of New York University (NYU).
 - While working at State, Mills worked on building a NYU branch in Abu Dhabi.

UNCLASSIFIED/[REDACTED]



UNCLASSIFIED/[REDACTED]

Chagoury

- There are allegations that donations by Gilbert Chagoury (between \$1 and \$5 million) to the Clinton Foundation influenced State Department decisions
- Allegations include:
 - State Department delayed declaration of Boko Haram as a foreign terrorist organization in order to financially benefit Chagoury;
 - State Department planned to buy land from Chagoury to build an embassy and;
 - Chagoury used his connections to the Clintons to have greater reach at the State Department
 - State Department expedited Chagoury's son's VISA and spoke to Doug Band about the status via e-mail communication

UNCLASSIFIED/[REDACTED]



UNCLASSIFIED/[REDACTED]

Digicel

- Digicel (owned by Denis O'Brien) is Haiti's largest mobile telecommunication provider and a majority provider of telecommunication in Ireland
- After the Haiti earthquake, Digicel built a luxury Marriott Hotel in Port-au-Prince and invested \$45 million and received \$26.5 million in world-bank affiliated IFC money
- In September 2010 weeks after Digicel applied to receive millions in aid from a state department agency (USAID), WJC made a speech in Dublin, sponsored by O'Brien. Clinton was not paid for the speech, however just months later Digicel made multiple large private donations to the foundation (CGI) totaling over \$5 million. In addition, weeks after Clinton's speech in Dublin, Clinton was paid \$225,000 for a Digicel sponsored speech in Kingston Jamaica. Two months later Digicel received its first installment of USAID grant money

UNCLASSIFIED/[REDACTED]



UNCLASSIFIED/[REDACTED]

VCS Mining

- December 2012, VCS Mining Company secures one of two mining contracts in Haiti
- Email traffic between Department of State officials, Cheryl Mills, Prime Minister Laurent Lamothe, and CEO Viard reference Viard's interest in the company and need for \$30 million in financing to secure the permit
- Viard suggests he will give up shares in exchange for the financing. Tony Rodham becomes a Board Member of VCS in 2013 and receives shares of the company around the same time Viard pays a \$20,000 membership fee to the Clinton Global Initiative (per Washington Post).

UNCLASSIFIED/[REDACTED]



From: [Ross, Jonathan D. \(USAARE\)](#)
To: [Hiland, Cody \(USAARE\)](#)
Subject: RE: Attorney Work Product: Investigation Update
Date: Friday, June 1, 2018 8:50:00 AM
Attachments: [Suhl.pdf](#)
[U.S. House Hearing - 113-43 - The Abu Dhabi Pre-Clearance Facility.pdf](#)

Cody,

On Wednesday, May 23rd I went to the FBI office here in Little Rock to review their current status concerning the investigation.

They have 17 302s (Reports of Investigation)

They have 9 Intelligence Summaries. These summaries are for internal distribution only at FBI and are available for review in any FBI office. They can't be disseminated.

They have [REDACTED] [REDACTED] concerning the Foundation and individuals for whom the foundation exists. Analysis of these records is ongoing. No estimate on the date of completion. They have concluded their review of all emails turned over to them by the OIG at the Department of State. They are finishing up the reports for this review and expect to have them completed very soon.

Most of the 302s pertain directly to the Uranium One component of the investigation, which as we have previously discussed, is actually NOT time barred by a statute of limitations pursuant to 18 U.S.C. 3287 – The Wartime Suspension of Limitations Act (See <https://dojnet.doj.gov/usao/eousa/ole/tables/subject/wartime.htm>), and also because payments from the subjects of the investigation to the Foundation were made continuously from 2007 through 2014. As we have previously discussed, the last act in furtherance of a conspiracy is the date from which a statute of limitations commences to run, not the date from which a public official resigned/left their office. (See <https://dojnet.doj.gov/usao/eousa/ole/tables/subject/crimlim.htm>) So any payments that were made as part of a pre-existing agreement for an official act taken (or intentionally NOT taken) during the time a public official was in office, but paid after the public official took any official action (or intentionally failed to take), are part of an ongoing conspiracy that is not completed until the last payment is made or any act of concealment is taken.

And it should also be noted that in *U.S. vs Suhl*, 885 F.3d 1106 (8th Cir. 2018), the 8th Circuit recently interpreted *McDonnell vs. United States*, 136 S.Ct. 2355 (2016) concerning both honest-services and federal-funds bribery. (attached above) The court in *Suhl* makes clear that with regard to 18 U.S.C. 201,

“The portion of § 201 relevant to payors like Suhl requires only an “intent ... to influence any official act.” 18 U.S.C. § 201(b)(1)(A). The relevant portion of the federal-funds bribery statute likewise requires payment with “intent to influence” a state actor “in connection *1113 with any business ... of ... [a state] agency.” 18 U.S.C. § 666(a)(2). Neither of these statutes, nor *McDonnell*, imposes a universal requirement that bribe payors and payees have a meeting of the minds about an

official act. A payor defendant completes the crimes of honest-services and federal-funds bribery as soon as he gives or offers payment in exchange for an official act, even if the payee does nothing or immediately turns him in to law enforcement.”

In light of this ruling, even when it is determined that no identifiable official act was taken by a public official after payments were made to the payee (public official), nevertheless, payments made by any Payor in exchange to attempt to influence any Payee (public official) to take formal action are prosecutable against the Payor even if the Payee never actually took the desired action. Furthermore, 18 U.S.C. 201(c) also criminalizes the act of paying a gratuity to a public official or former public official because of any former action taken by that official.

INFORMATION CONCERNING INTELLIGENCE SUMMARY of Uranium One:

The intelligence summary regarding Uranium One aka U/O fails to account for the dynamic related to possible deliberately false misrepresentations/false statements that may have been made by U/O officials to C.F.I.U.S. to induce the authorization sought to sell U/O to Rosatom. (i.e. that Rosatom could not export uranium). That the approval process included identified mitigation measures related to the export authorization of Rosatom and that U/O would continue to be publicly traded (which later changed) have not been considered by the FBI as part of its analysis, in my opinion, is an incomplete evaluation.

However, according to 50 U.S.C. App 2170(b)(D). . the President of the Committee may initiate a review (ii) of any covered transaction that has previously been reviewed or investigated under this section, if any party to the transaction submitted false or misleading material information to the Committee in connection with the review or investigation or omitted material information, including material documents, from information submitted to the Committee; or (iii) any covered transaction that has previously been reviewed or investigated under this section, if—

- (I) any party to the transaction or the entity resulting from consummation of the transaction intentionally materially breaches a mitigation agreement or condition described in subsection (l)(1)(A);
- (II) such breach is certified to the Committee by the lead department or agency monitoring and enforcing such agreement or condition as an intentional material breach; and
- (III) the Committee determines that there are no other remedies or enforcement tools available to address such breach.

This process is described by C.F.I.U.S. as “Unwinding”. To my knowledge, no such action has been taken regarding the U/O transaction, although this remains technically possible. The lack of such action may prove significant.

ADDITIONAL INVESTIGATIVE STEPS:



In my opinion there are remaining investigative tasks that should be completed regarding making a final assessment of the U/O matter. To include possible interviews with Mr. Guistra, Mr. Telfer, Mr. [REDACTED] the foreign nationals specifically identified by [REDACTED] as having made statements concerning the attempts to use the Foundation as a vehicle to influence the Secretary of State, the career official at the State Department that Undersecretary Fernandez communicated with prior to voting to approve the transaction, and officials at DOE that approved the export authorization for the trucking firm owned and operated by Rosatom after C.F.I.U.S. approval of the U/O acquisition. Also of note, according to [REDACTED] at C.F.I.U.S., unanimity is required for final approval of all decisions. Because of this unanimity requirement, a single "no" vote for approval results in an effective veto of the proposed action. As such, simply securing any voting member's agreement to not vote "no", can have a substantial value to any entity seeking to exercise influence on the authorization process.)

Description of the remaining Intelligence Summaries:

1. S Daniel Abraham Center for Mideast Peace – significant Foundation donor who attempted to gain access to the Secretary of State regarding his viewpoints concerning Middle East issues
2. Magna International – reversal of Russian owned bank [REDACTED] attempted acquisition of Opel (form GM)
3. Guistra and the Colombian Free Trade Agreement – Reversal of HRC's previous stance of the agreement after Guistra donations to Foundation
4. Abu Dhabi Preclearance Facility – Etihad Airlines' influence with DHS and CBP to obtain a preclearance facility in Abu Dhabi, United Arab Emirates after paying for several speeches to WJC (\$1.425 million) and to be honorary chairman of GEMS Education Group (\$5.6 million from 2011-2015)
5. Boeing – obtaining substantial contracts after donations to Foundation
6. VC Mining in Haiti – obtaining contracts and licenses to mine in Haiti after donations to Foundation
7. Digicel-Haiti – obtaining increased market share pursuant to favorable government treatment after donations to Foundation after 2010 Earthquake.

Each of these summaries have been updated to include corresponding emails provided by the State Department OIG. It should be noted that the tedious and time consuming process of analyzing this voluminous production of emails was completed just this week by a team of FBI analysts here in Little Rock on TDY that have been working since earlier this year)

Upon review, the matter that appears to justify the greatest investigative resources going forward is the Abu Dhabi preclearance facility. I have attached to this email, a transcript of testimony from July 10, 2013 before the Subcommittee on Terrorism, Nonproliferation and Trade of the Committee on Foreign Affairs for the House of Representatives. A review of the transcript clearly documents that there was substantial controversy related to DHS's decision to allow the construction and operation of the preclearance facility at Abu Dhabi. A basic internet query

yields a significant amount of articles related to this controversy. According to the news reports (Wall St. Journal and NY Times) the original 2009 application was denied, and then later authorized in 2011 after a series of paid speeches by WJC. Whether WJC/HRC obtained approval from Dept of State for these speeches pursuant to a conflict of interest review or review of an OGE 278 is not clear. It should also be noted that from 2011 to 2014, the Varkey G.E.M.S foundation, based in U.A.E. paid WJC \$5.6 million as the "honorary chairman" for the Dubai entity.

ADDITIONAL INVESTIGATIVE STEPS to consider CONCERNING PRE-CLEARANCE FACILITY:

1. to obtain all Dept. of State internal documentation of the conflict of interest review process to ascertain whether the appropriate authorizations were obtained and if so, whether a full disclosures were made in order for an accurate determination(s) to be made to comply with 18 U.S.C. 208
2. Obtain copies of the original 2009 application by Etihad Airways to gain a pre-clearance facility as well as the supporting internal memoranda/documents that explain why the application was rejected.
3. Interviews of the officials that made the Department's decision to reject the application
4. Obtain copies of the successful 2011 application and authorization documents from both Dept. of State and Department of Homeland Security.
5. Interviews of the officials that approved the application
6. Interviews with the APCO Worldwide officials (lobbying firm hired by Etihad to lobby U.S. Government for approval of the pre-clearance facility) and any additional individuals identified by such interviews. It should be noted that APCO Worldwide is the same consulting firm that was hired by Rosatom to lobby on behalf of the Russian Government for the acquisition of Uranium One, and also a donor to the Foundation.
7. Interviews with potential U.S. Government officials in UAE at the time that the facility was approved regarding any communications and/or the negotiations process.
8. Interviews with Etihad airways officials and UAE officials concerning the approval process.
9. Interviews with Varkey GEMS Foundation officials based in UAE that donated \$5.6 million to WJC from 2011 through 2014.
10. A review of the [REDACTED] demonstrates that there are additional [REDACTED] from several additional [REDACTED]

FURTHER INVESTIGATIVE STEPS:

Having read the summaries concerning Boeing and Digicel-Haiti, and also the Dept. of State emails that were identified as related to both of these matters, I believe that there are some additional investigative actions warranted concerning both of these matters as well. However, I would like to have the opinion of another AUSA before making any request for any such investigative actions.

[REDACTED]

I have also spoken with an IRS Criminal Investigator here in Little Rock on May 25th who stated that he had reviewed the 6000+ page complaint filed by [REDACTED]. He stated that he finished his report with his recommended actions earlier that week and that it had been sent to his supervisors at IRS. The report is for internal review only, so we cannot be provided with a copy, unless his supervisors grant us access.

CONCERNING THE NEED FOR ADDITIONAL RESOURCES:

I spoke with S.A. [REDACTED] at FBI on May 25th regarding this issue and he indicated that his agency has given him all the resources he needs for now with a commitment to add any additional resources as needed. However, I disagree with this assessment for two reasons. First, the 4 career agents that FBI Little Rock have that are currently allowed to work on public corruption investigations are also assigned to a significant ongoing public corruption investigation here in Arkansas. As you know, that investigation involves at least 3 U.S. Attorney's Offices and could demand the full attention of these agents for the indefinite future. Not only do these agents have their hands full with that investigation, they each have several other significant cases that they are working on. Even without the investigation of the Foundation, I believe that the FBI has allocated inadequate investigative resources to the Little Rock field office. But once you include the Foundation Investigation to their duties, I believe they simply don't have the resources here to give adequate attention to all that they are being asked to do. Furthermore, I believe the agents here have a depressed morale issue concerning their confidence in their authority to investigate the matter due to the email sent by former FAUSA Patrick Harris that he sent to the investigative team on January 30, 2018 in which he stated:

"Thursday, February 1 will be five years since Clinton resigned at state. I believe the statute of limitations has expired and the investigation of Uranium One/CFIUS has expired, as we were assuming that the statute would extend until she was no longer Secretary of State.

I think after February 1, 2018 we have no evidence to suggest we have jurisdiction to investigate matters that occurred more than five years ago and we should not be using [REDACTED] If there are interviews to conduct, so be it but i haven't seen the evidence to suggest another crime. I know there may be allegations of pay to play involving the foundation, but i haven't seen the evidence that gets us out of the statute of limitations problem in as much as Clinton resigned on 2/1/13."

As I have described above, [REDACTED] is simply wrong in his assessment concerning how statutes of limitation impact this investigation. I have met with [REDACTED] and asked him if he was aware of 18 U.S.C. 3287 when he drafted that email. His answer was "No. I've never heard of it". I have described this to the agents as well as other legal dynamics (ongoing payments past Feb 1, 2013, acts of concealment post Feb 1, 2013, and last act in furtherance of a conspiracy after Feb 1, 2013 etc.) and they acknowledge that there is no legal barrier in continuing

the present investigation. However, I believe due to their long term relationship with [REDACTED] and their high confidence in his opinions, the agents here in Little Rock continue to have some question in the back of their minds that suppresses their impetus to run this investigation to the ground. For all these reasons, I think that for this investigation to be adequately resourced, the FBI must allocate some additional agent support. Perhaps, even completely reassign this matter to a separate team of investigators. Furthermore, I also believe that we need additional AUSA support from outside our office. The unique dynamics of how this case has been handled here in our office by the previous management team and the significant caseload of our office is such that I don't have confidence in the ability of our existing staff to support this investigation.

Further complicating our need for resources is that the standard "go to" for such support on Public Corruption cases is Public Integrity at Main Justice. But as we have previously discussed, there appear to be conflicts of interest for the leadership there related to the 2016 investigations that undermine any confidence we might normally have in looking to them for assistance.

These resource issues have uniquely coalesced to the point that I'm not sure how we can ever obtain adequate resources to support this investigation. However, I have confidence that [REDACTED] will be able to work with us to identify a way forward.

One last matter: I also think there are some issues that we need an update from FBI WFO regarding the Weiner laptop as well as some possible other sources of Foundation emails.

Thanks,

Jonathan D. Ross
First Assistant United States Attorney
Eastern District of Arkansas
425 West Capitol Avenue
Little Rock, Arkansas 72201

[REDACTED]
[REDACTED]@usdoj [REDACTED]

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FROM USABook CONCERNING THE WARTIME SUSPENSION OF LIMITATIONS ACT:

The Wartime Suspension of Limitations Act ("WSLA"), codified at [18 U.S.C.](#)

[REDACTED]



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March 6, 2020

Investigative Update

Timeline:

- 7/5/2018: Original request from EDAR First Assistant Jonathan Ross to SAC Upchurch
- 7/20/2018: Teleconference with EDAR USA Cody Hiland, EDAR First Assistant Jonathan Ross, Little Rock and FBIHQ to discuss the request.
- 8/14/2018: AD Johnson and A/DAD Jimenez met with SAC Upchurch, USA Cody Hiland and First Assistant Jonathan Ross.
- 8/17/2018: A/DAD Jimenez chaired a meeting to discuss a follow-up request from First Assistant Jonathan Ross with additional investigative requests.
- 8/24/2018: First Assistant Jonathan Ross emailed SSA [REDACTED] with additional investigative requests.
- 8/31/2018: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 9/17/2018: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 9/28/2018: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 10/3/2018: SSA [REDACTED] traveled to D.C. to meet with DoS and CBP regarding Items 1-8 and 11.
- 10/12/2018: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 10/19/2018: EDAR/EDTX met with IRS SAC Dallas.
- 10/29/2018: Teleconference with EDAR USAO, EDTX USAO, LR, FBIHQ and DoS.
- 11/9/2018: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 11/27/2018: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 12/14/2018: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 1/11/2019: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 1/25/2019: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 2/22/2019: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 3/1/2019: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 3/15/2019: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 3/29/2019: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 4/12/2019: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 4/26/2019: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 5/10/2019: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 6/7/2019: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 6/21/2019: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 7/26/2019: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 8/9/2019: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 8/30/2019: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.

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- 9/19/2019: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 10/4/2019: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 10/18/2019: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 11/1/2019: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 11/22/2019: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 12/6/2019: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 12/20/2019: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 1/16/2020: Teleconference with LR and FBIHQ.
- 1/21/2020: IRS closed its investigation related to the Clinton Foundation.
- 1/24/2020: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 2/7/2020: Teleconference with EDAR USAO, EDTX USAO, LR and FBIHQ.
- 2/21/2020: Teleconference with EDAR USAO, EDTX USAO, LR, and FBIHQ.

Status Numbers:

Pending Initial Requests: 3

Requests on hold: 0

Pending Additional Requests: 3

Completed Requests: 32

Initial Requests:

ABU DHABI:

1. Obtain all Dept. of State internal documentation of the conflict of interest review process to ascertain whether the appropriate authorizations were obtained for speeches made by former President Clinton, and if so, an assessment as to whether full disclosures were made in order for an accurate determination(s) to be made to comply with 18 U.S.C. 208.

- (LR) Records obtained by SSA [REDACTED] from DOS OIG SAC [REDACTED] on 1/29/18 {Serial 39}.
- (LR) Records reviewed by SOS [REDACTED] on 2/1/18 {Serial 41}
- (LR) On 8/31/18 SSA [REDACTED] agreed to provide documentation to FA Ross for further analysis.
- (LR) On 9/4/18 SA [REDACTED] provided the ethics documentation to FA Ross {Serial 78}\
- (FBIHQ/LR) On 10/3/18 SSA [REDACTED] and SSA [REDACTED] met with DoS OIG SAC [REDACTED] regarding the Pre-Clearance facility in Abu Dhabi and conflict of interest documentation.
- (FBIHQ/LR/EDAR) On 11/27/18 SSA [REDACTED] agreed to schedule a meeting with SAC [REDACTED] and FA Ross regarding Cheryl Mills and conflict of interest or ethics advisor roles.
- (LR) On 12/20/18 SAC [REDACTED] provided SSA [REDACTED] with Cheryl Mills' conflict of interest documents.
- (LR) On 1/11/19 SSA [REDACTED] agreed to provide the Cheryl Mills documents to FA Ross for review.
- (LR) On 1/22/19 DOS attorney [REDACTED] returned from furlough and began to search for responsive documents for Abu Dhabi in preparation for LR's visit to D.C.
- (FBIHQ/LR/EDAR) On 2/22/19 SSA [REDACTED], SSA [REDACTED] and FA Ross spoke with DOS attorneys regarding these documents.
- (LR) On 3/5/2019 DOS attorney [REDACTED] emailed the requested C175 documentation.
- (LR/FBIHQ) On 4/11/19 the DOS email review was completed.



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- (FBIHQ/LR/EDAR) After the email review is complete, LR/EDAR will schedule a teleconference with [REDACTED].
- (LR/EDAR/EDTX) On 4/19/2019 LR provided a CD containing tagged documents to EDAR and EDTX.
- (EDAR) On 4/26/2019 FA Ross asked for clarification about the CD provided by LR.
- (LR) On 4/29/2019 SA [REDACTED] provided FA Ross an email clarifying what was provided via CD on 4/19/2019. On 4/30/2019 SA [REDACTED] provided a second CD containing tagged documents to EDAR and EDTX.
- (EDAR/EDTX) This request is pending review of the documents by EDAR/EDTX.
- (EDAR/EDTX) On 7/25/2019 FA Ross and AUSA Coan requested a follow-up document request of State Department records concerning ethics and financial disclosure for Abedin and Mills and Conflict of Interest reviews for WJC speeches.
- (EDTX) On 7/26/2019, AUSA Coan agreed to create a request list for follow-up State documents and later provided an initial request list.
- (EDAR/EDTX/LR) On 7/31/2019, EDAR/EDTX requested the interview of [REDACTED]. On 7/31/2019 SSA [REDACTED] stated that they have location information for [REDACTED] and will begin making contact.
- (EDTX) On 8/2/2019, AUSA Coan provided a revised request list.
- (LR) On 8/7/2019, LR made contact with [REDACTED], who is still at DOS. [REDACTED] is not available the week of 8/19/2019. LR emailed [REDACTED] a request for documentation related to WJC's paid speeches while HRC was Secretary of State.
- (LR) LR anticipates meeting with SAC [REDACTED] during the week of 8/19/2019 and requesting AUSA Coan's requested documents.
- (LR) On 8/8/2019, [REDACTED] confirmed she is not available the week of 8/19, but wants to schedule a telephone interview.
- (LR) On 8/30/19, LR confirmed they will re-contact [REDACTED] to schedule an interview.
- (LR/EDAR) On 9/17/19, LR/EDAR interviewed [REDACTED]. [REDACTED] stated she would provide a DoS point of contact for ethics documentation.
- (LR) On 9/20/19 [REDACTED] provided the point of contact, [REDACTED]. On 10/3/19, LR emailed [REDACTED] a request for documents.
- (LR) On 10/3/19 LR sent the FD-302 of [REDACTED] to EDAR / EDTX.
- (EDAR/EDTX) On 10/4/19, EDAR/EDTX requested an interview of [REDACTED], the former DoS Ethics person.
- (LR) 10/17/19 update: LR has attempted, without success, to contact [REDACTED]. Efforts to locate [REDACTED] continue. LR is still waiting for [REDACTED] to provide documents.
- (LR) 11/1/19 update: Interview with [REDACTED] is scheduled for 11/13/19. LR is still waiting for [REDACTED] to provide documents.
- (LR) 11/13/19: LR interviewed [REDACTED].
- (LR) 11/21/19 update: LR and EDTX are still coordinating with DoS for the requested documents.
- (EDTX): On 11/22/19, EDTX requested SAC [REDACTED]'s assistance in the DoS request.
- (LR/EDTX): 12/20/19: LR is coordinating with EDTX on appropriate documentation to provided DoS for the request.
- (LR/EDTX): 1/16/20: DoS advised that it requires a written request from the FBI indicating the FBI is conducting an investigation of possible criminal violations related to the individuals for whom personnel records are sought.
- (LR): 1/24/20: LR is currently drafting a written request to DoS.
- (LR): 2/6/20: AUSA Coan provided suggested language for the State Department records request for Cheryl Mills and Huma Abedin. Language will be finalized on 2/7/20 conference call.

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- (LR) 2/11/20: SSA [REDACTED] sent email to State Department requesting records for Cheryl Mills and Huma Abedin. As of 2/13/20, no response has been received.
- (LR) 2/20/2020: SSA [REDACTED] received a response from [REDACTED] stating she had received the email request from 02/11/2020 and that on the basis of my representations, my "request appears to fall within the following routine use in the Department of State's Prefatory Statement". [REDACTED] advise she was "looping" in HR and would be back in touch soon.
- (LR) 2/21/20: LR received an incomplete response from State Department regarding the requested personnel documents. LR is following up with State Department regarding the remainder of the requested documents.

12. As to Uranium One: interviews with Mr. Guistra, Mr. Telfer, Mr. William Campbell, (which should only be done after a review of his CHS file maintained by the FBI), the foreign nationals specifically identified by [REDACTED] as having made statements concerning the attempts to use the Foundation as a vehicle to influence the Secretary of State; the career official at the State Department that Undersecretary Fernandez communicated with prior to voting to approve the transactions before CFIUS; and officials at DOE that approved the export authorization for the trucking firm owned and operated by Rosatom after C.F.I.U.S. approval of the U/O acquisition. It should be noted that according to [REDACTED] at C.F.I.U.S., unanimity is required for final approval of all decisions. Because of this unanimity requirement, a single "no" vote for approval results in an effective veto of the proposed action. As such, simply securing any voting member's agreement to not vote "no", can have a substantial value to any entity seeking to exercise influence on the authorization process.) *

- (LR) DOE Employee [REDACTED] was interviewed on 12/6/17 {Serial 24}.
- (LR) [REDACTED] was interviewed on 12/18/17 and provided a thumb drive of information to LR {Serial 28}.
- (LR) Jose Fernandez was interviewed on 12/28/17 {Serial 27}.
- (LR) Doug Band was interviewed on 12/28/17 {Serial 29}.
- (LR) Jose Fernandez was interviewed on 1/29/18 {Serial 42}.
- (LR) [REDACTED] thumb drive was reviewed by SOS [REDACTED] on 2/1/18 {Serial 40}
- (FBIHQ) FA Ross and [REDACTED] attended a CFIUS briefing from [REDACTED] on 3/8/18. All pertinent CFIUS documents were requested by SSA [REDACTED] at this meeting and were received on 3/16/18 {Serial 54}.
- (LR) On 5/10/18 Little Rock conducted a review of the CFIUS documents {Serial 65}.
- (FBIHQ) SSA [REDACTED] interviewed former DOS employee [REDACTED] on 6/27/18 {Serial 74}.
- (LR) SSA [REDACTED] coordinated with Counterintelligence for information regarding the [REDACTED] on 8/21/18.
- (LR) On 8/31/18 SSA [REDACTED] agreed to provide the [REDACTED] 302 to FA Ross.
- (LR) On 9/4/18 SA [REDACTED] provided the requested 302s and NRC material to FA Ross {Serial 78}
- (LR) On 9/17/18 SSA [REDACTED] agreed to work with relevant Legats for OCONUS interviews.
- (EDTX) On 9/17/18 the EDTX attorney's agreed to prepare for potential OCONUS travel.
- (LR) SSA [REDACTED] received information from Legats in London, Paris and Bern regarding OCONUS travel.
- (LR) On 9/22/18 Legat Bern replied that an interview could not be conducted on Swiss soil. Third party countries are being explored as an option.
- (LR) On 9/24/18 Legat London wanted to clarify citizenship and advised notification of the host country would possibly be necessary.
- (LR) On 9/27/18 Legat Paris advised a MLAT might be necessary and/or host country notification.

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- (LR) On 11/26/18 SSA [REDACTED] submitted a request to Legat London to assist with locating [REDACTED].
- (FBIHQ/LR) On 12/4/18 Legat London requested a case summary and specifics on the interviewee.
- (LR) On 1/11/19 SSA [REDACTED] agreed to reach out to Legat London regarding the FDR.
- (LR) On 3/15/19 SSA [REDACTED] agreed to create a case summary product for Legat London.
- (LR) On 5/10/19, LR provided a case summary to Legat London and requested assistance locating [REDACTED].
- (LR/FBILON) On 6/6/19, SSA [REDACTED] provided a tearline to Legat London and they verified they are working with UK counterparts to locate [REDACTED].
- (EDTX) On 7/25/19, AUSA [REDACTED] identified [REDACTED], [REDACTED], [REDACTED] and [REDACTED] as potential interviews.
- (FBIHQ/LR/EDAR/EDTX) On 7/26/19 conference call, the following was discussed / decided. [REDACTED] is deceased; LR will attempt to determine [REDACTED]'s location for a potential future interview; [REDACTED] interviews are on hold pending the results of the [REDACTED] interview.
- (LR) 8/8/19 Update: LR is in constant contact with London about locating [REDACTED]. London has identified multiple potential locations. Further coordination with London is anticipated.
- (LR) 8/29/19 Update: LR attempted to contact [REDACTED] via phone and email without success.
- (LR) On 9/6/19, LR requested additional assistance from London to identify contact information for [REDACTED].
- (FBILO) 9/17/19, LO reached out to their UK counterparts for assistance. Results are pending.
- (FBILO) On 9/25/19 LO identified an additional contact phone number.
- (LR) 10/16/19 update: LR was unsuccessful in contacting [REDACTED] with the new number.
- (LR) On 10/17/19, LR requested LO attempt contact with [REDACTED]. Results pending.
- (LR) 11/1/19 update: LO is working with partners to verify contact info.
- (LR) 11/21/19 update: Legat Paris confirmed an MLAT would be required to coordinate an interview of [REDACTED]. This request is pending EDAR/EDTX review.
- (EDTX) On 11/22/19, EDTX stated a decision about the MLAT will be reached before the next meeting.
- (EDTX) At 12/6/19 meeting, EDTX stated they do not plan to pursue an MLAT to interview [REDACTED] at this time but are awaiting results of potential [REDACTED] interview to make a final determination.
- (EDTX) 1/24/20: Efforts to locate and interview [REDACTED] in London have been unsuccessful to date. LR is continuing its coordination with LO.
- (LR) 1/28/20: LR contacted LO and inquired if LO would require a new FDR for [REDACTED] or if the current FDR could be used. LR has not received a decision from LO as of 1/29/20.
- (LR) 1/31/20: LO requested a new FDR from LR for Agapov. LR drafted new FDR which is pending final signatures as of 2/3/20.
- (LR) 2/4/20: SSA [REDACTED] met with Europe unit at IOD regarding logistics to interview [REDACTED] and [REDACTED] who are currently residing in Switzerland. IOD suggested Vienna, Luxembourg and London as possible locations to conduct the interviews.
- (LR) On 2/5/20 or 2/6/20 LR provided updated addresses for the [REDACTED] that show residences in Switzerland.
- (LO) 2/5/20: Legat LO provided FDR to UK authorities.
- (LO) 2/13/2020: Legat LO and UK authorities made contact with [REDACTED] at his residence. [REDACTED] advised he is willing to speak with the FBI. LR is coordinating with LO on possible interview dates.

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- (LO) 02/21/2020: ALAT [REDACTED] has made contact with [REDACTED] and is attempting to set up a date for an interview Tue 31 March or Tues 17 March in that order. He will advise when he can confirm the date.
- (LR) 02/19/2020: SSA [REDACTED], SSA [REDACTED] (IOD), and Legat [REDACTED] spoke regarding interviewing the [REDACTED] in Switzerland. Legat advised the most direct route to an interview is to approach it as intel vs. criminal. The Swiss would be more amenable to this approach. Little Rock will draft an FDR requesting permission to travel to Bern for an intel based interview.
- (LR) 3/2/2020: LR reached out to WFO CI SSA [REDACTED] to request background intel information on the [REDACTED]
- (LR) 3/5/2020: LR received DD approval for LR case agents to travel to LO on 3/14 to conduct interview of [REDACTED] on 3/17.

24. As we gain access to the above described materials for consideration as to a search warrant application for the Weiner device, it is becoming clear that we should simultaneously apply for search warrants of the Clinton Foundation servers for communications between Mr. Band and others at the Clinton Foundation that were coordinating meetings with State Department employees and Foundation donors after apparent gifts/donations to the Clinton Foundation.

- (LR) Assist FA Ross as materials are obtained.
- (FBIHQ/LR) Pending email review.
- 2/19/2020: AUSA Kristina Barkely (Huber Team) has requested access to 12 classified emails and they want access to the 3000 plus unique emails from the Wiener laptop. They advised they had a hard deadline of 2/21/2020, per AG Barr, but they were advised that deadline would not be met as we have to find the emails at WFO/OTD and ship them, with [REDACTED], to Salt Lake City to be loaded. This request is pending.
- (LR) 2/5/2020: Rick McNally contacted LR and advised the requested emails had been found by OTD and were being forwarded to Salt Lake City. On 2/28/20, [REDACTED] deployed to Salt Lake to load these emails onto the [REDACTED] server.

Requests on hold:

None

Additional Requests:

32. FA Ross requested the FBI review their holdings for materials seized from the Pagaliano server via a search warrant.

- (FBIHQ) SC McNally agreed to conduct this search.
- (FBIHQ) On 4/30/2019 SC McNally agreed to follow-up with OTD.
- (FBIHQ) On 6/4/2019 OTD verified that they still have the data and can provide it when requested.
- (EDAR/EDTX) On 6/7/2019, it was agreed that this request is pending EDAR/EDTX review of the legal authority used to seize the data.
- (EDTX) On 11/22/19, EDTX stated a decision about this request will be reached before the next meeting.

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- (EDTX) On 12/6/19, EDTX advised that discussions about this request and the ability to obtain legal process are ongoing; a call with a former analyst assigned to the matter will occur prior to the 12/13/2019 meeting.
- (LR) 12/20/19: LR is still coordinating a time with the former analyst to discuss with EDTX/EDAR.
- (LR) 1/16/20: LR has consulted with the former analyst, who advised that the e-mails reviewed in the Midyear investigation were non-pertinent and were largely personal in nature.

34. FA Ross identified that approximately 17,000 emails were found by the Mid Year investigators that had not been turned over by Mrs. Clinton's lawyers, which includes the 3,200 emails from Item # 33. Have the remaining 14,000 emails already been reviewed as part of those turned over by the DOS?

- (EDAR) On 6/21/2019, FA Ross stated that no further action is required at this time. He and AUSA Coan have to determine if there are any legal issues with re-reviewing them.
- (FBIHQ) On 6/25/2019, SSA [REDACTED] asked SC McNally to contact OTD about gathering the 14,000 emails for a potential review.
- (FBIHQ) On 7/3/2019, SC McNally stated that OTD is working with WFO on gathering the emails.
- (FBIHQ) On 8/7/2019, OTD sent 2 discs containing the 17,000 emails to LR. LR will coordinate with Sang on the review once the discs arrive in LR.
- (LR) LR received the disc on 8/12/2019.
- (FBIHQ/LR) 8/28/2019 Update: [REDACTED] uploaded the emails; the emails are in the wrong file format for [REDACTED] to conduct his de-duping. LR asked OTD for the emails in the native format. OTD stated they cannot provide the emails in the native format.
- (EDAR/EDTX) On 8/30/2019, EDAR/EDTX requested a conference call be set up with [REDACTED] and SC McNally to discuss / brainstorm what other options exist for electronically de-duping the 17,000 emails. FBIHQ requested EDAR/EDTX provide legal opinion about whether manual review of emails is allowable under current legal authorities and setup a conference call to determine what potential review process would entail.
- (FBIHQ/LR/EDAR/EDTX) On 9/6/2019 a conference call was had.
- (FBIHQ) On 9/12/2019, SC McNally confirmed OTD would send LR the emails in an appropriate format.
- (LR) On 9/18/2019, LR confirmed receipt of a CD from OTD and is coordinating with [REDACTED] for his return trip to LR.
- (FBIHQ/LR) On 10/2/2019, [REDACTED] traveled to LR and was able conduct his de-duping process against the provided dataset. LR / EDAR / EDTX will discuss and evaluate next steps.
- (FBIHQ/LR) On 10/9/2019, [REDACTED] traveled back to LR and re-ran the de-duping with a determination that 0 emails provided by OTD were contained in the LR [REDACTED] holdings. EDAR / EDTX have been updated on the results.
- (EDAR/EDTX) On 10/18/2019, it was agreed that this request is pending EDAR/EDTX review of the legal authority used to seize the data. No further action is requested at this time.
- (EDTX) On 11/22/19, EDTX stated a decision about this request will be reached before the next meeting.
- (EDTX) As of 12/6/19, a decision about this request has not been reached.
- (FBIHQ/LR/EDAR/EDTX) 1/24/20: At meeting/teleconference, it was agreed that DOJ would contact Secretary Clinton's attorney David E. Kendall to seek further consent to review the e-mails.

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- (FBIHQ) 2/3/20: SC McNally is coordinating with USAO Huber's team to arrange for [REDACTED] to travel to Salt Lake City to set up a [REDACTED] server and [REDACTED] laptops to review the 17,000 Mid-Year emails. [REDACTED] advised he should be able to deploy Wednesday to Friday to allow for a review start date of Monday, 2/10/20. SAC Salt Lake has advised the office will provide secure space for attorney review.
- (FBIHQ) 2/5/20: SC McNally provided [REDACTED] with the requested documents. [REDACTED] loaded the documents into [REDACTED] and [REDACTED] the server and [REDACTED] laptops to Salt Lake City. [REDACTED] deployed on 2/6/20 to Salt Lake City to set up equipment for a start date of 2/10/20 for Huber's team to start review.
- (FBIHQ/LR/EDAR/EDTX) 2/7/2020: On 2/7/20 conference call, DOJ/AUSA Coan advised they would be operating under the original consent to review the emails.
- (FBIHQ) 2/12/20: [REDACTED] advised 1st review should be completed by 2/14/20 and 2nd review team will be flying into Salt Lake City the week of 2/24/20. [REDACTED] will return to Salt Lake City to load new data (if needed) and provide any required assistance.

36. On 7/25/2019 FA Ross and AUSA [REDACTED] requested ethics and conflict review documentation of Cheryl Mills and Huma Abedin from Department of State.

- (EDTX) AUSA [REDACTED] agreed to create a request list for followup State documents.
- (EDTX) On 7/26/2019, AUSA [REDACTED] provided an initial request list.
- (EDTX) On 8/2/2019, AUSA [REDACTED] provided a revised request list.
- (LR) LR anticipates meeting with SAC [REDACTED] during the week of 8/19/2019 and requesting the requested ethics and conflict documents.
- (LR/EDAR) 8/29/2019 Update: LR/EDAR travelled to DC, but the meeting with [REDACTED] did not occur due to other investigative activities.
- (LR) On 8/30/2019, LR agreed to make contact with [REDACTED] again.
- (LR/EDAR) On 9/17/19, LR/EDAR interviewed [REDACTED]. [REDACTED] stated she would provide a DoS point of contact for ethics documentation.
- (LR) On 9/20/19 [REDACTED] provided the point of contact, [REDACTED]. On 10/3/19, LR emailed [REDACTED] a request for documents.
- (LR) On 10/3/19 LR sent the FD-302 of [REDACTED] to EDAR / EDTX.
- (EDAR/EDTX) On 10/4/19, EDAR/EDTX requested an interview of [REDACTED], the former DoS Ethics.
- (LR) 10/16/19 update: LR has attempted, without success, to contact [REDACTED]. Efforts to locate [REDACTED] continue. LR still waiting for [REDACTED] to provide documents.
- (LR) 11/1/19 update: Interview with [REDACTED] is scheduled for 11/13/19. LR is still waiting for [REDACTED] to provide documents.
- (LR) 11/13/19: LR interviewed [REDACTED].
- (LR) 11/21/19 update: LR and EDTX are still coordinating with DoS for the requested documents.
- (EDTX): On 11/22/19, EDTX requested SAC [REDACTED] assistance in the DoS request.
- (LR/EDTX): 12/20/19 update: LR is coordinating with EDTX on appropriate documentation to provided DoS for the request.
- (LR) 1/28/20: See #1.

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40. TIR review suggested by FA Ross:

- (EDAR) 2/13/20: FA Ross began review of TIRs.
- (EDAR) As of 3/3/2020, EDAR/EDTX reviewed the TIRs and the results of these reviews are documented in the case file. FA Ross wishes to discuss further [REDACTED] TIRs: [REDACTED] and Columbia Free Trade Agreement.
- (EDAR) 3/3/2020: EDAR advised no further action is needed on the following: [REDACTED].

37. On 7/25/2019 FA Ross and AUSA Coan requested the interview of Gilbert Chagoury.

- (EDAR/EDTX) EDAR/EDTX will follow-up with LA AUSA [REDACTED] regarding the status of Chagoury's [REDACTED] and make a determination about the potential interview.
- (EDTX) 8/9/2019 update: LA has completed the [REDACTED] yet, but anticipates it will do so by the end of August. Any potential interview would likely be conducted in the [REDACTED]. No further action until after LA completes [REDACTED] with Chagoury.
- (EDAR) On 8/30/2019, EDAR confirmed no further action pending [REDACTED].
- (EDAR) On 9/12/2019, AUSA Jenkins requested EDAR / EDTX assistance in drafting the [REDACTED].
- (EDAR) On 10/4/2019, FA Ross received update from AUSA Jenkins that agreement expected to be signed the following week (10/7/2019).
- (EDAR) 10/18/2019 update: Still waiting to hear the agreement has been signed.
- (EDTX): On 11/22/19, EDTX confirmed that Chagoury has signed the [REDACTED]. An interview of Chagoury is scheduled for 1/7/2020 in [REDACTED].
- (EDAR): 1/16/2020: Chagoury was interviewed in [REDACTED] on 1/7/2020. Chagoury advised that he donated to the Clinton Foundation because he believed in the good work that the organization was doing. Chagoury further advised that he sought a personal meeting with Secretary Clinton to discuss the treatment of Christians in Lebanon but was never granted one.

On 7/25/2019, AUSA Frank Coan provided the following Additional Requests:

CRACKED FOUNDATION – ACTION ITEMS

GENERAL

- Uranium One
 - Continue coordinating with Legat London regarding location/interview of [REDACTED].
 - Locate/interview [REDACTED].
 - Need for MLAT(s)?
 - Being tracked on Item # 12 above.
- Sant Sing Chatwal (NY)
 - Contact case agents (SA [REDACTED], SA [REDACTED]) about CHS.
 - Review CHS file.
 - Interview [REDACTED] of [REDACTED].
 - Being tracked on Item # 30 above.

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- Gilbert Chagoury (LA)
 - Continue coordinating with case agent (SA [REDACTED]).
 - Prepare for debrief (Fall 2019?).
 - Added to new Item # 37 above.
- [REDACTED] (Boston)
 - Contact case agent (SA [REDACTED]) about Digicel.
 - FBI-Cleveland investigation of Digicel?
 - Interview [REDACTED] of [REDACTED].
 - Added to new Item # 38 above.
- Huma Abedin
 - Results of 2703(d) order from MYE investigation.
 - Being tracked on Items # 19 & 35 above.
 - DOS records re: transition from SES to SGE.
 - DOS Ethics Agreement.
 - Being tracked on Item # 36 above.

ABU DHABI PRECLEARANCE FACILITY

- PCF Approval Process
 - Records from DHS
 - Pre-July 2011 communications/records.
 - June 2013 response to questions from Rep. Peter King.
 - Response to January 2014 questions from Rep. Jason Chaffetz.
 - Matrix and related records showing facilities/locations under consideration for PCF.
 - Being tracked on Item # 31 above.
 - Interviews of relevant DHS and DOS personnel.
 - Most interviews not requested at this time, unless otherwise noted.
 - [REDACTED] – DOS Bureau of Economic and Business Affairs, Office of Transportation Policy; former Senior Analyst, DHS Transportation Security Administration.
 - Rand Beers – former DHS Under Secretary for National Protection and Programs Directorate; Senior Advisor at Global Security & Intelligence Strategies.
 - Requested, being tracked on Item # 5 above.
 - Jose Fernandez – former DOS Assistant Secretary for Bureau of Economic, Energy, and Business Affairs; partner with Gibson, Dunne & Crutcher.
 - Being tracked on Item # 31 above.
 - [REDACTED] – DOS-UAE Desk Officer.
 - [REDACTED] – CBP-International Relations.
 - Being tracked on Item # 31 above.
 - Robert Hormats – former Under Secretary of State for Economic Growth, Energy, and Environment; Vice Chairman of Kissinger Associates.
 - Noah Kroloff – former Chief of Staff to DHS Secretary Napolitano; principal and co-founder of Global Security & Intelligence Strategies consulting firm.

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- Requested, being tracked on Item # 5 above.
 - [REDACTED] – Commissioner of CBP.
 - Janet Napolitano – former DHS Secretary; President, Univ. of California.
 - John Sandweg – former Acting Director of ICE, Acting DHS General Counsel, and Counselor at DHS; principal at Frontier Solutions consulting firm.
 - [REDACTED] – DHS attaché to Ambassador Rick Olson.
 - Requested, being tracked on Item # 5 above.
 - Others to be identified – DHS and CBP signatories to December 2011 Letter of Intent.
- Identify/interview UAE official(s).
 - [REDACTED] – UAE Ambassador to United States.
 - Pending. Not being requested at this time. Being tracked on Item #8 above.
- Etihad Airways
 - Interview [REDACTED] (former President/CEO).
 - Pending. Not being requested at this time. Being tracked on Item #8 above.
- Cheryl Mills
 - Results of 2703(d) order from MYE investigation.
 - Being tracked on Item # 35 above.
 - Collect/review all DOS Ethics documents.
 - Being tracked as Item # 36 above.
 - Determine role with respect to New York University-Abu Dhabi.
 - Interview [REDACTED] (Vice Chancellor, NYU-AD).
 - Identify/interview other NYU officials, if needed.
 - Identify/interview Mubadala officials.
 - This request is pending further clarification from EDAR/EDTX.
 - Financial
 - Bank records for CD [REDACTED].
 - Tax returns (FY2009-2014).
 - Being tracked as Item # 39 above.
- UAE Speeches
 - Research regarding speech details (attendees, travel, etc.).
 - Confirm/collect DOS Conflict-of-Review records.
 - Requests from Office of WJC, internal review by DOS, formal response by DOS.
 - 11/03/09 speech – do not have WJC request or DOS response.
 - 4/09/13 speech – do not have DOS internal review or response.
 - Interview DOS Ethics personnel.
 - [REDACTED] – Senior Ethics Counsel.
 - Being tracked on Item # 31 above.
 - [REDACTED] – Acting Legal Adviser; Designated Agency Ethics Official.

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- [REDACTED] – Principal Deputy Legal Adviser.
- Being tracked on Items # 1 & 36 above.
- Payments
 - Trace payments to WJC for all UAE speeches.
 - Payments for 12/13/11 and 4/09/13 speeches wired to personal account.
 - Payments for 11/03/09, 10/03/10, 12/12/10 speeches?
 - Records from [REDACTED] (speaker bureau for WJC & HRC) regarding UAE speeches.
 - General information regarding Foundation endowment (created in 2013/14)
 - Interview of [REDACTED] (CFO).
 - Records of communications between Foundation and UAE Embassy.
 - No further action requested at this time. Tabled for further discussion with EDAR/EDTX.

OBSTRUCTION – DELETED EMAILS

- Compare FBI-LR “federal records” set to OTD collection of recovered deleted emails from MYE investigation.
- Associate matching “federal records” with source device/account.
- Re-review “federal records” that fall within OTD collection.
- Determine next steps, including possible witness interviews ([REDACTED], etc.).
- No further action requested until after review of 17,000 emails being tracked as Item # 34

Completed Requests:

2. Obtain copies of the original 2009 application by Etihad Airways to gain a pre-clearance facility in U.A.E. submitted to the State Department and Department of Homeland Security as well as the supporting internal memoranda/documents that explain why the application was rejected.

- (LR) SSA [REDACTED] requested documentation from CBP Branch Chief [REDACTED] on 8/30/18. [REDACTED] responded he was not familiar with any attempt in 2009.
- (LR) As of 9/27/18, no documentation was discovered about this item.
- (FBIHQ/LR) As of 10/2/18, no documentation discovered. Will be updated/closed following SSA [REDACTED] visit to CBP on 10/4/18.
- (FBIHQ/LR) On 10/3/18 SSA [REDACTED] and SSA [REDACTED] met with DoS OIG SAC [REDACTED] regarding the Pre-Clearance facility in Abu Dhabi. No information on a 2009 application was discovered.
- (FBIHQ/LR) On 10/4/18 SSA [REDACTED] and SSA [REDACTED] met with CBP AD [REDACTED] regarding the Pre-Clearance facility in Abu Dhabi. No information on a 2009 application was discovered.
- This matter is completed.

3. Interviews of the officials that made the Department's decision to reject the original application.*

- Pending the results of Item #2
- Completed request

4. Obtain copies of the successful 2011 application and authorization documents from both State Department and Department of Homeland Security.

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- (LR) SSA [REDACTED] requested documentation from CBP Branch Chief [REDACTED] on 8/14/18.
- (LR) SSA [REDACTED] received documentation from CBP Branch Chief [REDACTED] on 8/29/18.
- (LR) SSA [REDACTED] requested "Dip Note" mentioned in DHS response from DOS SAC [REDACTED] on 8/29/18.
- (LR) SAC [REDACTED] replied to SSA [REDACTED] via email on 8/31/18. SAC [REDACTED] will update the status of this request soon.
- (LR) On 8/31/18 SSA [REDACTED] agreed to provide documentation to FA Ross for additional review.
- (LR) On 9/4/18 SA [REDACTED] provided the DHS documentation to FA Ross {Serial 78}
- (LR) On 9/17/18 SSA [REDACTED] agreed to follow up with SAC [REDACTED] for an update.
- (FBIHQ/LR) On 10/3/18 SSA [REDACTED] and SSA [REDACTED] met with DoS OIG SAC [REDACTED] regarding the Pre-Clearance facility in Abu Dhabi.
- (LR) On 10/3/18 the "Dip Note" was discovered in documentation provided by [REDACTED].
- (FBIHQ/LR) On 10/4/18 SSA [REDACTED] and SSA [REDACTED] met with CBP AD Rebekah Bacon regarding the Pre-Clearance facility in Abu Dhabi. CBP is collecting their documentation and will contact SSA [REDACTED] when ready for pickup.
- (LR) On 11/7/18 [REDACTED] provided SSA [REDACTED] with CBP pre-clearance documentation. This information was passed on to EDAR. {Serial 87}
- (LR) On 1/22/19 DOS attorney [REDACTED] returned from furlough and began to search for responsive documents for Abu Dhabi in preparation for LR's visit to D.C.
- (FBIHQ/LR/EDAR) On 2/22/19 SSA [REDACTED], SSA [REDACTED] and FA Ross spoke with DOS attorneys regarding these documents.
- (LR) On 3/5/2019 DOS attorney [REDACTED] emailed the requested C175 documentation.
- (LR/FBIHQ) On 4/11/19 the DOS email review was completed.
- (FBIHQ/LR/EDAR) After the email review is complete, LR/EDAR will schedule a teleconference with [REDACTED].
- (LR/EDAR/EDTX) On 4/19/2019 LR provided a CD containing tagged documents to EDAR and EDTX.
- (EDAR) On 4/26/2019 FA Ross asked for clarification about the CD provided by LR.
- (LR) On 4/29/2019 SA [REDACTED] provided FA Ross an email clarifying what was provided via CD on 4/19/2019. On 4/30/2019 SA [REDACTED] provided a second CD containing tagged documents to EDAR and EDTX.
- (EDAR/EDTX) This request is pending review of the documents by EDAR/EDTX.
- (EDAR/EDTX/LR) On 10/17/19, per discussion with EDAR / EDTX / LR, it was agreed that this item is completed.

5. Interviews of the officials that approved the application.

- Pending the receipt/review of documents in Item #4.
- Pre-clearance facility interviews: Based on the 7/25/2019 requested interview list (see below), FA Ross and AUSA Coan identified the following three interviews as being needed now: [REDACTED]
[REDACTED] The other possible interviews are pending. ([REDACTED])
[REDACTED]
- (LR) LR is working to identify the location of: [REDACTED].
- (LR) On 7/31/2019 SSA [REDACTED] stated that they have location information for [REDACTED] and will begin making contact.
- (LR) 8/8/2019 Update: Attempts have been made to reach [REDACTED] without success. Additional attempts will be made. An interview of [REDACTED] has been scheduled for 8/20/2019.

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- (EDTX) On the 8/9/2019 EDTX agreed to provide [REDACTED]. LR emailed [REDACTED] after the meeting.
- (LR/EDAR) LR and EDAR travelled to DC and interviewed [REDACTED], the former Commissioner of CBP on 8/20/2019.
- (LR) LR interviewed [REDACTED] on 8/27/2019.
- (EDAR/EDTX/LR) 8/30/2019: EDAR/EDTX stated no further interviews are requested at this time. EDAR/EDTX will review the interview FD-302s when completed before suggesting next steps. LR agreed to provide FD-302s as soon as finalized.
- (LR) On 9/9/2019 LR provided EDAR/EDTX with the FD-302s.
- (EDAR/EDTX) On 10/4/19, EDAR/EDTX requested an interview of [REDACTED], formerly DoS.
- (LR) 10/16/19 update: LR has attempted, without success, to contact [REDACTED]. Efforts to locate [REDACTED] continue.
- (LR) 11/1/19 update: Interview with [REDACTED] is scheduled for 11/13/19.
- (LR) 11/13/19: LR interviewed [REDACTED].
- (EDAR/EDTX/FBIHQ/LR) On 11/22/19, it was agreed that this item is completed.

6. Interviews with the APCO Worldwide officials (lobbying firm hired by Etihad to lobby U.S. Government for approval of the pre-clearance facility) and any additional individuals identified by such interviews. It should be noted that APCO Worldwide is the same consulting firm that was hired by Rosatom to lobby on behalf of the Russian Government for the acquisition of Uranium One, and also a donor to the Foundation.

- (LR) LD-2 disclosure form indicates [REDACTED] was a registered lobbyist for APCO Worldwide in 2015 {INTELPRODS serial 17}.
- (EDAR) On 8/31/18 FA Ross agreed to provide the Wall Street Journal article where this information was obtained.
- (LR) On 8/31/18 SSA [REDACTED] agreed to provide the LD-2 documentation to FA Ross for additional review.
- (LR) On 9/4/18 SA [REDACTED] provided the lobbying information to FA Ross {Serial 78}
- On 9/17/18 FA Ross clarified his knowledge of this matter was from the published TIR. Ross agreed to review the TIR again for potential next steps.
- On 12/14/2018 this was marked complete.

7. Interviews with potential U.S. Government officials in UAE at the time that the facility was approved regarding any communications and/or the negotiations process.

- (LR) Former HSI Attache [REDACTED] interviewed 4/24/18 {Serial 62}
- (LR) Former Ambassador to UAE [REDACTED] interviewed 6/1/2018 {Serial 71}
- (LR) Former Ambassador to UAE [REDACTED] interviewed 6/20/2018 {Serial 72}
- (EDAR) Coordinate with LR to identify additional officials.
- (LR) on 8/31/18 SSA [REDACTED] agreed to provide the [REDACTED] 302s to FA Ross for review.
- (LR) On 9/4/18 SA [REDACTED] provided the requested 302s to FA Ross {Serial 78}
- (EDAR) On 9/17/2018 FA Ross agreed to review the pertinent 302s to identify potential next steps.
- Pending the results of Items # 1 & 4.
- (EDAR/EDTX/LR) On 10/17/19, per discussion with EDAR / EDTX / LR, it was agreed that this item is being tracked as #5. Therefore this item is deemed to be completed.

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8. Interviews with Etihad airways officials and UAE government officials concerning the approval process.

- Pending results of Items #2,3,4,6,7.
- (LR) Review case file to identify potential interviews.
- (EDAR) Coordinate with LR to identify specific officials.
- (EDAR) On 8/31/18 FA Ross agreed to provide the news articles where this information was obtained.
- (FBIHQ/LR) On 10/4/18 SSA [REDACTED] and SSA [REDACTED] met with CBP AD Rebekah Bacon regarding the Pre-Clearance facility in Abu Dhabi. CBP is collecting their documentation and will contact SSA [REDACTED] when ready for pickup.
- (LR) On 11/7/18 Rebekah Bacon provided SSA [REDACTED] with CBP pre-clearance documentation. This information was passed on to EDAR. {Serial 87}
- (EDAR) On 12/14/18 FA Ross agreed this task was on hold until further notice.
- (EDAR/EDTX/LR) On 10/17/19, per discussion with EDAR / EDTX / LR, it was agreed that this item is no longer necessary.

9. An assessment of the relationship between the UAE Government and the Varkey GEMS Foundation as to whether the Varkey GEMS Foundation works to advance the interests of the UAE Government. And consideration of potential interviews with Varkey GEMS Foundation officials based in UAE that donated \$5.6 million to former President Clinton from 2011 through 2014.

- (EDAR) 8/31/18: Clarification needed on type of assessment requested
- (EDAR) On 8/31/18 FA Ross provided guidance for further investigative steps.
- (LR/EDAR) On 8/31/18 FA Ross and IA [REDACTED] agreed to discuss the content of a pertinent intelligence product.
- (LR) On 9/28/18 IA [REDACTED] agreed to complete an EC outlining the facts of Item.
- (LR) On 10/12/18 IA [REDACTED] completed a rough draft of the EC.
- (LR) On 11/9/18 IA [REDACTED] advised the draft EC was under review.
- (LR/EDAR) On 11/27/18 IA [REDACTED] advised the EC was completed. IA [REDACTED] will discuss the findings with FA Ross.
- (EDAR/EDTX/LR/FBIHQ) On 1/11/19 this item was marked complete.

10. Review of the [REDACTED] to determine whether there are additional [REDACTED] [REDACTED].

- (LR) FOA [REDACTED] provided the [REDACTED] scheduling to FA Ross on 8/31/18.
- (LR/EDAR) On 8/31/18 FA Ross and FOA [REDACTED] agreed to follow up after FA Ross analyzes the [REDACTED].
- (LR) On 9/4/18 SA [REDACTED] provided a CD of all [REDACTED] [REDACTED] to FA Ross {Serial 78}
- (EDAR/EDTX) On 9/17/18 FA Ross agreed to provide guidance for the analysis of the [REDACTED].
- (EDAR/LR) On 9/28/18 EDAR and LR agreed to discuss the potential investigative avenues for these records.
- (EDAR/EDTX/LR) On 10/17/19, it was agreed that this discussion will happen soon.
- (EDTX) On 11/22/19, EDTX stated this discussion will occur before the next meeting and a decision will be reached regarding whether this item is deemed completed.
- (EDTX) Per 12/6/19 meeting, this item has been deemed completed.

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11. An assessment of the provided testimony transcript from the Congressional hearing on July 10, 2013 in which concerns were provided regarding the approval and construction of the pre-clearance facility.

- (EDAR) Clarification needed on type of assessment requested.
- (EDAR) On 8/31/18 FA Ross gave clarification and agreed to provide relevant excerpts to LR.
- (EDAR) On 9/27/18 FA Ross provided an email with updated thoughts for this item.
- Pending the results of Items # 1 & 4.
- (EDAR/EDTX/LR) On 10/17/19, per discussion with EDAR / EDTX / LR, it was agreed that this item is completed.

13. Results of any analysis of [REDACTED] within the possession of the FBI to [REDACTED]

[REDACTED] . We should also meet to discuss the findings so as to determine whether we [REDACTED]

- (EDAR) On 8/28/18 FA Ross emailed SSA [REDACTED] an amendment to this request. Rather than a list of the top 20 or 30 payees from the bank records, he would like to just have the full list.
- (LR) FOA [REDACTED] will provide the payee information by 9/7/18.
- (LR) On 9/6/18 FOA [REDACTED] provided FA Ross with payee information for [REDACTED] accounts.
- (LR) On 9/14/18 FOA [REDACTED] provided [REDACTED] with payee information for the remainder of the [REDACTED] accounts, [REDACTED] and [REDACTED].
- (EDAR/EDTX) On 9/17/18 [REDACTED] agreed to provide guidance for the analysis of the records [REDACTED].
- (EDAR/LR) On 9/28/18 EDAR and LR agreed to discuss the potential investigative avenues for these records.
- (EDAR) On 12/14/18 [REDACTED] advised he requested assistance from the IRS for this matter.
- (EDAR/LR) On 1/11/19 FoA [REDACTED] agreed to be available to assist IRS as requested.
- (EDAR/EDTX/LR) On 10/17/19, per discussion with EDAR / EDTX / LR, it was agreed that this item is being tracked as #10. Therefore this item is deemed to be completed.

14. **GILBERT CHAGOURY:** In light of the emails released by the State Department pursuant to FOIA litigation that revealed that a foreign individual who had pledged to donate a billion \$ to the Clinton Global Initiative was able to have a Clinton Foundation employee (Doug Band) seek and arrange a meeting with the Secretary of State through Ms. Abedin we are requesting a briefing on the Los Angeles Field Office's Investigation regarding Mr. Chagoury. We also request verification of any donations and total sums received by Clinton Foundation entities by Mr. Chagoury or his affiliated organizations.

- (FBIHQ) SSA [REDACTED] spoke with SA [REDACTED] on 8/30/18. The CDCA AUSA is [REDACTED], Chief PC/CR, [REDACTED].
- (FBIHQ) SSA [REDACTED] emailed SSA [REDACTED] this information on 8/30/18.
- (LR) SSA [REDACTED] emailed FA Ross this information on 8/30/18.
- (EDAR) On 8/31/18 FA Ross agreed to follow up with CDCA AUSA Mack E. Jenkins and update the team.
- (EDAR) On 9/12/18 FA Ross spoke with AUSA Jenkins regarding the two cases.

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- (FBIHQ) On 9/17/18 SSA [REDACTED] agreed to coordinate with the LA and LR offices to find mutual interests. SSA [REDACTED] will also search for a potential WFO case opening after Chagoury attended a donor dinner at the White House.
- (FBIHQ) On 10/9/18 SSA [REDACTED] conducted database checks for the Chagoury information.
- (FBIHQ/EDAR/EDTX/LR) On 10/9/18 the team spoke with SA [REDACTED] and AUSA Mack Jenkins via teleconference. AUSA Jenkins provided an affidavit for a search warrant as supporting documentation and a factual outline.
- (EDAR/LR) On 10/10/18 FA Ross requested FoA [REDACTED] conduct financial analysis regarding any and all payments made by Chagoury to the CF.
- (LR) On 10/12/18 FoA [REDACTED] advised she conducted the analysis requested on 10/10 and would provide the results to FA Ross.
- (EDAR/LR/FBIHQ) On 10/12/18 it was agreed this task was completed.

15. We would also like to formally debrief with Los Angeles FBI SAC Matthew S. Moon regarding his previous knowledge and work on the Chagoury investigation.

- Pending the receipt of information from Item #14.
- (EDAR) 8/31/18: Clarification needed by FA Ross as to the type of interview or meeting requested so it can be coordinated by the correct entity.
- (FBIHQ) On 8/31/18 A/DAD Jimenez agreed to coordinate with SAC Moon and SAC Upchurch to facilitate the meeting if required after Item #14.
- (EDAR) On 9/17/18 FA Ross agreed this item is unnecessary given increased coordination with LA.

16. REPORT titled, "Anthony Weiner Laptop Review for Communications Pertinent to Midyear Exam", dated November 15, 2016.

- (EDAR) On 8/31/18 FA Ross provided additional information about this document.
- (FBIHQ) On 8/31/18 SC McNally and SSA [REDACTED] agreed to obtain this documentation if it is in the possession of the FBI.
- (EDAR) On 9/17/18 FA Ross advised this information was provided by AUSA Sean Driscoll (NDIL). No further action was necessary at this time.

17. Additional INFORMATION concerning data on Weiner laptop known to FBI prior to execution of second search warrant.

- (EDAR) 8/31/18: Clarification needed by FA Ross.
- (EDAR) On 8/31/18 FA Ross advised he spoke with DOJ OIG Joshua Mahan regarding this request.
- (EDAR) On 8/31/18 FA Ross advised no further action was required for this Item.

18. The identity and access for an INTERVIEW with the LEAD ANALYST that performed forensic analysis of Weiner laptop at OTD (Quantico) between October 30, 2016 and November 6, 2016 so as to determine:

- a. Whether any of his/her work product contains evidence relevant to the EDAR investigation from the "full review" of the 48,892 subset of 694,000 items recovered from the Weiner laptop.
- b. Whether any of the 6,827 emails between Ms. Abedin and Ms. Clinton contain evidence relevant to the EDAR investigation.
- c. Whether evidence concerning additional third parties with which Ms. Abedin communicated

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(beyond Mr. Weiner) were identified and if so, to then compare such information with known subjects of the EDAR investigation for an assessment as to whether the device potentially contains relevant evidence. Apparently this was also done by the NYO that executed the first search warrant.

d. Describe and provide information related to record keeping process of specific steps taken to review all relevant metadata information sets and how such information was cataloged/described so as to determine whether this process resulted in describing evidence relevant to investigation in EDAR.

e. Describe and provide information related to process used to "rapidly de-duplicate" the emails

- (FBIHQ) SSA [REDACTED] provided FA Ross with FBI DAD Jonathan Moffa's contact information on 8/3/18 via email.
- (EDAR) On 8/29/18, FA Ross requested a meeting with the lead analyst scheduled for 9/6/18.
- (FBIHQ) On 8/31/18 SC McNally outlined his efforts to obtain the correct POC for the information FA Ross requested. SC McNally agreed to follow up with FA Ross when a POC was identified.
- (FBIHQ) On 8/31/18 SC McNally outlined efforts to identify portions of the emails that might be marked as evidence and available for review.
- (EDAR/FBIHQ/LR) On 8/31/18 FA Ross outlined a potential taint team process and the investigative team briefly discussed the logistics of conducting the review in EDTX.
- (EDAR/FBIHQ/LR) On 9/14/18 FA Ross, SC McNally and ASAC [REDACTED] spoke with DAD Johnathan Moffa. Moffa will provide additional information regarding potential pertinent points of contact.
- (FBIHQ) On 9/17/18 SC McNally advised he is working to coordinate a meeting with a NY CART analyst.
- (EDAR/EDTX/FBIHQ) On 9/17/18 EDAR, EDTX, FBIHQ and AUSA [REDACTED] (USAMA) conducted a teleconference with ASAC [REDACTED].
- (EDAR/EDTX/LR/FBIHQ) On 9/25/18 there was a conference call with [REDACTED].
- (EDAR/EDTX/LR/FBIHQ) On 10/3/18 there was a conference call with [REDACTED].
- (FBIHQ) On 10/12/18 SC McNally agreed to search for the [REDACTED] information.
- (EDAR/FBIHQ) On 11/9/18 SC McNally and FA Ross discussed the [REDACTED] information available.
- (FBIHQ) On 11/26/18 SC McNally identified the names of the two Midyear analysts and agreed to coordinate with FA Ross for conference calls.
- (FBIHQ) On 12/13/18 SSA [REDACTED] spoke with NY CDC [REDACTED]. CDC [REDACTED] agreed to facilitate a conversation with [REDACTED] regarding the logistics of the [REDACTED] review.
- (FBIHQ/EDTX) From 1/22-1/24 [REDACTED] will travel to the Tyler RA on to assist EDTX with the [REDACTED] review.
- (FBIHQ/EDAR) On 1/11/19 it was agreed [REDACTED] and SC McNally have to coordinate to conduct the final two meetings.
- (EDTX) On 1/23/19 [REDACTED] review began at the Tyler RA and was concluded on 1/24/19.
- (EDAR/EDTX/FBIHQ) On 2/8/19 FA Ross indicated the remaining two analyst meetings could be postponed due to the information obtained from the [REDACTED] review.
- (EDAR/EDTX/LR) On 10/17/19, per discussion with EDAR / EDTX / LR, it was agreed that this item is completed.

19. Whether PRESERVATION REQUESTS were made for Ms. Abedin's email accounts at yahoo.com, Clinton.com, Clinton.gov, Clintonfoundation.org, @AW.com, Clintonemail.com, hillaryclinton.com, presidentclinton.com. And if so, access to information concerning any preserved data and whether additional search warrants were obtained. If additional search warrants were obtained, then access to basic information related to the execution of such search warrants that might also contain evidence relevant to the EDAR investigation.

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- (FBIHQ) On 8/31/18 SC McNally and SSA [REDACTED] agreed to obtain this documentation if it is in the possession of the FBI.
- (EDAR) On 9/17/18 FA Ross advised he spoke with AUSA Sean Driscoll (NDIL) who mentioned 2703 D orders were issued for some email accounts.
- (EDAR/FBIHQ) On 9/17/18 FA Ross and SSA [REDACTED] agreed to coordinate on this matter.
- (EDAR) On 9/28/18 FA Ross agreed to follow up with AUSA Sean Driscoll (NDIL) to see if he is in possession of any preservation requests.
- (FBIHQ) On 10/12/18 SC McNally advised he was working on obtaining these documents if they were in FBI holdings.
- (FBIHQ) On 6/21/2019, SC McNally confirmed he is working with WFO and they are looking.
- (FBIHQ) On 8/8/2019, SC McNally confirmed the results of the 2703(d) order had been sent to LR by WFO on disks. LR confirmed receipt. LR sent a copy to EDTX.
- (EDTX) On 8/30/2019 EDTX confirmed receipt of disk containing 2703(d) results. AUSA Coan has reviewed. EDTX requested this item remain in a pending status until further decision has been made by EDAR/EDTX. No further action requested at this time.
- (EDAR/EDTX/LR) On 10/17/19, per discussion with EDAR / EDTX / LR, it was agreed that this item is completed.

20. WEINER'S ICLOUD account Information that was voluntarily turned over by his attorney (but not communications between Ms. Abedin and Mr. Weiner that may be protected by marital privilege) See OIG Report page 279.

- (FBIHQ) On 8/31/18 SC McNally and SSA [REDACTED] agreed to obtain this documentation if it is in the possession of the FBI.
- (EDAR) On 9/17/18 FA Ross advised he spoke with DOJ-OIG Joshua Mahan who mentioned there was no ICLOUD information.
- (FBIHQ) On 9/17/18 SSA [REDACTED] agreed to follow up with DOJ-OIG Joshua Mahan.
- (FBIHQ) On 9/26/18 SSA [REDACTED] spoke with Mahan who advised there was no iCloud information.
- Nothing further required for this item.

21. A copy of any IMMUNITY AGREEMENT given to Ms. Abedin, so as to determine whether the EDAR is bound by such an agreement.

- (EDAR) On 8/31/18 FA Ross advised his conversation with DOJ OIG Joshua Mahan indicated there was no immunity agreement for Ms. Abedin.
- (FBIHQ) On 8/31/18 SSA [REDACTED] agreed to obtain this documentation if it is in the possession of the FBI or SDNY.
- (FBIHQ/EDAR) On 8/31/18 SSA [REDACTED] and FA Ross agreed to communicate to determine the names of other individuals who might have immunity agreements of interest.
- (FBIHQ) On 9/5/18 SSA [REDACTED] emailed FA Ross about additional names of interest for this item.
- (FBIHQ) On 9/26/18 SSA [REDACTED] spoke with Mahan who indicated there was never an immunity agreement with Ms. Abedin.
- Nothing further required for this item.

22. Furthermore, regarding the anticipated task of evaluating a search warrant for the Weiner device, WHERE IS IT PHYSICALLY LOCATED? A search warrant must be sought and issued in the place where the device is physically located.



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- (FBIHQ) On 8/31/18 SC McNally identified the location of the data. The data is still housed in the NY [REDACTED].

23. Also, it has been disclosed to me that Huma Abedin turned over a number of devices to her attorney so that they could be picked up by the FBI, but according to my information, those devices have never been retrieved. Do you have any information about this?

- (EDAR) On 8/31/18 FA Ross clarified this information came from DOJ-OIG Joshua Mahan.
- (FBIHQ) On 8/31/18 SC McNally and SSA [REDACTED] agreed to obtain this documentation if it is in the possession of the FBI.
- (FBIHQ) On 9/17/18 SC McNally advised he has discussed this matter with OTD to see what the FBI has in evidence. SSA [REDACTED] will follow up with DOJ-OIG Joshua Mahan on this matter.
- (FBIHQ) On 9/26/18 SSA [REDACTED] spoke with [REDACTED] who advised some devices were turned over to Ms. Abedin's defense attorney in order for them to scrub the devices for official DoS work product. According to Mahan, these devices were never offered to DOJ or FBI, and the whereabouts are unknown.
- (FBIHQ/LR/EDAR) On 10/12/18 SSA [REDACTED] agreed to follow up on this item.
- (FBIHQ) On 11/9/18 SSA [REDACTED] briefed no additional was obtained from a search of FBI holdings.

25. Also, after reading through the New York Times article concerning Chagoury, I was led to the Judicial Watch website (noted above). While on that site, I found a deposition transcript that Ms. Abedin gave on June 28, 2016 in which she made several statements about her usage of her Huma@Clintonemail.com to conduct official business for the State Department during her time there and also to conduct personal business for the Clinton Family. That deposition transcript is attached, and based upon my initial review, several portions are material to any search warrant affidavit for a device known to contain emails of Ms. Abedin, such as the Weiner devices and the Foundation servers.

- (EDAR) Work with LR to identify investigative leads.
- (EDAR) On 8/31/18 FA Ross agreed to provide pertinent excerpts to the investigative team.
- (FBIHQ/LR) Pending email review.
- (EDAR/EDTX/LR) On 10/17/19, per discussion with EDAR / EDTX / LR, it was agreed that this item is completed.

26. On 8/28/18 FA Ross emailed SSA [REDACTED] a DOS-OIG report with a request to follow up on the report and see what happened next and whether a final report/assessment was made on the matter.

- (LR) SSA [REDACTED] will follow up with DOS OIG.
- (EDAR) On 9/11/18 FA Ross met with DOS-OIG SAC Robert Smolich.
- (FBIHQ) On 9/17/18 SSA [REDACTED] agreed to follow up with WFO to identify any steps taken by FBI personnel.
- (FBIHQ) On 10/9/18 SSA [REDACTED] conducted searches of FBI databases regarding this request. No steps were taken outside of the WFO assessment file.
- (FBIHQ/LR/EDAR) On 10/12/18 it was agreed this task is complete.

27. On 8/31/18 FA Ross requested any 302s of Huma Abedin.

- (FBIHQ) On 8/31/18 SSA [REDACTED] agreed to follow up with FA Ross to determine additional interviews of interest and provided those when obtained.

[REDACTED]

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- (FBIHQ) On 9/5/18 SSA [REDACTED] emailed FA Ross about additional names of interest for this item.
- (EDAR) On 9/17/18 FA Ross advised he received two Abedin 302s from AUSA Sean Driscoll (NDIL).
- (EDAR) On 9/27/18 FA Ross advised nothing further was required for this item.

28. On 10/12/18 FA Ross requested an email review be conducted regarding emails involving [REDACTED] and [REDACTED].

- (FBIHQ/LR) Pending email review.
- (LR) On 11/9/18 SSA [REDACTED] advised this matter was completed by SA [REDACTED] and the responsive information was shared with FA Ross.

29. On 12/14/18 FA Ross requested the FBI follow up with SA [REDACTED] regarding his email to [REDACTED] about "dark money" into Foundation accounts.

- (FBIHQ/LA) On 12/19/18 SSA [REDACTED] spoke with SA [REDACTED] regarding this email chain. SA Carter recalled being looking at Foundation account deposits and see donations from corporations. SA Carter also mentioned see Foundation donations to non-profits that seems politically aligned. The records he conducted an analysis of were given to LR in 2017 for their investigation.
- (LR) On 1/11/19 it was agreed FoA [REDACTED] would discussed this matter with SA [REDACTED].
- (LR) On 4/1/19 FoA [REDACTED] spoke to SA [REDACTED].
- (FBIHQ/LR/EDAR) On 4/12/19 it was agreed this task was completed.
- (LR) On 4/29/19 FoA [REDACTED] documented her contact with SA [REDACTED].

30. On 12/14/2018 FA Ross requested the FBI speak with NY regarding the [REDACTED] case and any transcripts they might have.

- (FBIHQ/NY) On 12/19/2018 SSA [REDACTED] spoke with CDC [REDACTED] and SA [REDACTED]. SA [REDACTED] discussed the investigation and advised he would go back through his work file and see if there were any transcripts he could provide.
- (FBIHQ) On 1/25/2019 CDC [REDACTED] provided SSA [REDACTED] with several consensually monitored meeting/phone call transcripts responsive to this request. The Title III did not produce any responsive transcripts. The transcripts were provided to [REDACTED] the same day.
- (EDAR) On 2/20/2019 FA Ross requested meetings with the Chatwal case agents and the CHS handler. FA Ross also requested additional information from documents discussing this investigation.
- (FBIHQ) On 4/10/2019 SC McNally agreed to facilitate these interviews.
- (FBIHQ) On 4/30/2019 SC McNally agreed to contact NY CDC [REDACTED] to check the status of this request.
- (EDAR/EDTX/FBIHQ) On 6/5/2019 SC McNally coordinated a conference call with FBIHQ, NY, EDAR, and EDTX. NY ASAC [REDACTED] provided background and insight into the CHS utilized in the Chatwal case.
- (EDAR/EDTX) This request is pending review by EDAR/EDTX.
- (EDAR/EDTX) It was determined the best next step was to provide the handling agent a list of questions to ask the CHS. Based on the CHS' responses and the feedback from the handling agent, a determination will be made whether to attempt an interview of the CHS. EDAR/EDTX will work on the list of questions.

[REDACTED]

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- (EDAR/EDTX) On 8/30/2019, EDAR requested this item remain in a pending status until further decision has made by EDAR/EDTX. No further action requested at this time.
- (EDAR/EDTX/LR) On 10/17/19, per discussion with EDAR / EDTX / LR, it was agreed that this item is completed.

31. On 3/15/2019 FA Ross requested the FBI interview [REDACTED] from Department of Homeland Security.

- (LR) SSA [REDACTED] is working with DHS/CBP AD [REDACTED] to determine whether [REDACTED] is still employed with DHS and what her current contact information is.
- (LR) On 4/29/2019 SSA [REDACTED] made contact with [REDACTED] agreed to identify whether any CBP attorneys that were involved are still with CBP. She also agreed to look for any documentation or notes that she may still have.
- (LR) On 6/6/2019 [REDACTED] stated she did not locate any documentation.
- (LR) On 6/7/2019 SSA [REDACTED] anticipates meeting with [REDACTED] in person.
- (LR) On 7/25/2019 [REDACTED] requested coordination of any meeting / interview with her supervisor.
- (LR) LR made contact with CBP attorney [REDACTED]. Meeting scheduled for 8/20/2019 in Washington, D.C.
- (LR/EDAR) LR and EDAR travelled to DC the week of 8/19 and interviewed [REDACTED] on 8/20/2019.
- (FBIHQ/LR/EDAR/EDTX) On 8/30/2019, it was agreed this matter is completed.

33. On 4/26/2019, FA Ross requested access to approximately 3,200 emails from the Platte River Server that were from the email accounts of Jack Sullivan, Cheryl Mills, and Huma Abedin.

- (FBIHQ) On 4/30/2019 SC McNally agreed to contact OTD regarding this request.
- (FBIHQ) OTD provided a CD with the requested emails. On 6/5/2019 SC McNally agreed to send the CD to LR so that they can coordinate the review.
- (LR) SA [REDACTED] received the CD and made it available to EDAR/EDTX. This request is pending review by EDAR/EDTX.
- (EDAR) On 6/21/2019, FA Ross advised that he has reviewed all of the provided emails.
- (FBIHQ/LR/EDAR/EDTX) On 8/30/2019, it was agreed this matter is completed.
- (EDAR/LR) On 1/29/20, at the request of FA Ross, LR is sending copies of the Platte River Server emails to SC McNally, to be turned over to the Huber investigative team.

35. FA Ross asked what 2703(d) orders were issued for Huma Abedin's Yahoo account and Cheryl Mills' Gmail account?

- (FBIHQ) The Abedine portion of this request is the same as Item #19 above.
- (FBIHQ) On 6/21/2019, SC McNally confirmed he is working with WFO and they are looking.
- (FBIHQ) On 7/26/2019 SC McNally confirmed WFO served a 2703(d) order and agreed to try to get a copy of the orders.
- (FBIHQ) On 8/8/2019, SC McNally confirmed the results of the 2703(d) order had been sent to LR by WFO on disks. LR confirmed receipt. LR sent a copy to EDTX.
- (EDTX) On 8/30/2019 EDTX confirmed receipt of disk containing 2703(d) results. AUSA Coan has reviewed. EDTX requested this item remain in a pending status until further decision has made by EDAR/EDTX. No further action requested at this time.

[REDACTED]

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- (EDAR/EDTX/LR) On 10/17/19, per discussion with EDAR / EDTX / LR, it was agreed that this item is completed.
38. On 7/25/2019 FA Ross and AUSA Coan requested the interview of [REDACTED] (Boston).
- (EDTX) AUSA Coan spoke with the Boston AUSA, who thought a referral may have been made to Cleveland. Attempted interview of [REDACTED] is on hold pending review of a possible Cleveland [REDACTED] case.
 - (FBIHQ) FBIHQ determined Boston case agent [REDACTED] is still in Boston.
 - (LR) SA [REDACTED] spoke with SA [REDACTED]. SA [REDACTED] verified that he never passed any information to Cleveland.
 - (LR) On 10/3/19 LR sent the FD-302 of [REDACTED] to EDAR / EDTX.
 - (EDTX) On 10/4/19, EDTX requested this item remain in a pending status until further decision has made by EDAR/EDTX. No further action requested at this time.
 - (EDAR/EDTX/LR) On 10/17/19, per discussion with EDAR / EDTX / LR, it was agreed that this item is completed.
39. On 7/25/2019 FA Ross and AUSA Coan requested the financial analysis of bank records related to Cheryl Mills, specifically [REDACTED] and [REDACTED] for FY 2009-2014.
- (LR) On 8/9/2019 LR FOA [REDACTED]
 - (LR) LR [REDACTED] on 8/14/2019. [REDACTED]
 - (EDAR) On 8/23/2019, EDAR agreed to give [REDACTED] an extension until 10/3/2019.
 - (EDAR) On 10/2/2019, EDAR [REDACTED]
 - (EDAR/LR) On 10/4/2019, FA Ross sent the [REDACTED] to FOA [REDACTED]. [REDACTED] is pending.
 - (EDAR/EDTX/LR) On 10/17/2019 FOA [REDACTED] provided EDAR / EDTX with her analysis. It was then agreed that this item is completed.