

# KLAYMAN LAW GROUP, P.A.

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VIA FACSIMILE TRANSMISSION  
AND FEDERAL EXPRESS

**EXPEDITED PROCESSING AND  
TREATMENT REQUESTED**

December 3, 2018

Hon. Matthew G. Whitaker  
Attorney General of the United States (Acting)  
U.S. Department of Justice  
950 Pennsylvania Avenue, N.W.  
Washington, D.C. 20530

Hon. Brian A. Benczkowski  
Assistant Attorney General  
Criminal Division  
U.S. Department of Justice  
950 Pennsylvania Avenue, N.W.  
Washington, D.C. 20530

Hon. Jessie K. Liu  
U.S. Attorney for the District of Columbia  
555 4th Street, N.W.  
Washington, D.C. 20530

Hon. Robin C. Ashton  
Chief of Office of Professional Responsibility  
U.S. Department of Justice  
950 Pennsylvania Avenue, N.W.  
Washington, D.C. 20530

Hon. Michael E. Horowitz  
Inspector General  
U.S. Department of Justice  
950 Pennsylvania Avenue, N.W.  
Washington, D.C. 20530

Hamilton Fox, Esq.  
Bar Disciplinary Counsel  
District of Columbia Bar  
Building A, Suite 117  
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Washington, D.C. 20001

**RE: COMPLAINT AGAINST SPECIAL COUNSEL ROBERT MUELLER AND PROSECUTORIAL STAFF AND REQUEST FOR EXPEDITED INVESTIGATION INTO GROSS PROSECUTORIAL MISCONDUCT AND CRIMINAL ACTS OF PROSECUTING ATTORNEYS IN THE CRIMINAL INVESTIGATION OF DR. JEROME CORSI, PH.D.**

Dear Ladies and Gentlemen:

Dr. Jerome Corsi, Ph.D. (“Dr. Corsi”) files this Complaint by and through his counsel Mr. Larry Klayman (“Mr. Klayman”). Mr. Klayman is a former prosecutor in the Department of Justice’s (“DOJ”) Antitrust Division and the founder and former chairman of Judicial Watch, as well as the founder, chairman, and general counsel of Freedom Watch. Mr. Klayman was also formerly a U.S. Senate candidate in the State of Florida in 2004. Given his background, Mr. Klayman holds a great deal of respect for the Office of the Attorney General and the DOJ, but nonetheless believes that this Complaint is necessary. Mr. Klayman took the same oath to administer to and mete out justice within the bounds of ethics and the law as a member of the DOJ just as Special Counsel Robert Mueller and the prosecutors specifically hired by Mr. Mueller did.

**I. INTRODUCTION**

On or about May 17, 2017, Robert Swan Mueller III (“Special Counsel Mueller”) was appointed as a Special Counsel for a limited purpose investigation as defined by the order of Deputy Attorney General Rod Rosenstein. A copy of Robert Mueller’s appointment as Special Counsel is attached as Exhibit A. Dr. Corsi has been investigated by Special Prosecutor Mueller and the attorneys whom he hired to serve as prosecutors under him, including but not limited to (a) Jeannie S. Rhee, (b) Andrew D. Goldstein, (c) Aaron S.J. Zelinsky, and (d) L. Rush Atkinson.

This Complaint concerns the politically-motivated criminal investigation of Dr. Corsi, an investigative journalist, whose activities are protected by the First Amendment to the U.S. Constitution. Dr. Corsi has been threatened with immediate indictment by Mueller’s prosecutorial

staff unless he testifies falsely against Roger Stone and/or President Donald Trump and his presidential campaign, among other false testimony.

Dr. Corsi is placed in an impossible, no-win scenario and is in immediate legal jeopardy. If he were to lie under oath to testify as the Special Prosecutor and his prosecutorial staff demand, some later prosecutor could accuse Dr. Corsi of perjury and/or violating any plea deal. The Special Prosecutor and his prosecutorial staff have already accused Dr. Corsi of lying when Dr. Corsi is in fact telling the truth and told the truth. Either way, Dr. Corsi remains at risk of a perjury prosecution without the relief demanded.

Dr. Corsi is being investigated for the “crime” of doing his job as a foreign policy and national security journalist. For decades, Dr. Corsi has been a recognized and distinguished investigative journalist, who has published 20 news analysis books written regularly in news outlets. Some of these books were New York Times Bestsellers.

In a March 10, 2015 press conference, former U.S. Secretary of State Hillary Clinton admitted that as Secretary of State she had conducted U.S. Government business through a non-government, private email server. Secretary Clinton stated that she had turned over 30,490 emails but deleted nearly 32,000 others.

Immediately after March 10, 2015, people experienced in foreign affairs and national security instantly recognized to a virtual certainty that Clinton’s emails had already been acquired by the espionage services of every major nation and perhaps passed on to terrorist organizations, because (a) the server was not secure and (b) communications of the U.S. Secretary of State would be a high priority for spy agencies.

Dr. Corsi was only one of hundreds of journalists protected by the First Amendment to the U.S. Constitution while investigating the story. Ultimately, this story led to further, but different, revelations that Wikileaks was releasing emails from the computer servers of the Democratic

National Committee (“DNC”) on Friday, July 22, 2016.<sup>1</sup> “On the evening of July 5, 2016, 1,976 megabytes of data were downloaded from the DNC’s server. The operation took 87 seconds . . . No Internet service provider . . . was capable of downloading data at this speed.”<sup>2</sup>

Wikileaks actually announced before July 22, 2016, that it would release DNC documents and do so in several batches, which was widely reported ahead of time, including in The New York Times. See Exhibit B, attached. Readers of The New York Times and other news received the same foreknowledge from mid to late July of which the Special Counsel's office now accuses Dr. Corsi and Roger Stone of supposedly acquiring in August 2016.

Dr. Corsi – as he has stated publicly – noticed that emails to and from Hillary Clinton’s campaign manager John Podesta were conspicuously missing from the July 22, 2016 public-release of DNC emails. Employing his professional skills and considerable experience as an analyst and investigative journalist, Dr. Corsi logically concluded that Wikileaks would release Podesta’s emails soon in a second round “data dump” from the same group of DNC emails stolen on July 5, 2016.

Special Counsel Mueller and his prosecutorial staff, however, have misrepresented the investigative research of hundreds of journalists into a false narrative that Dr. Corsi and/or Roger Stone “colluded” with Russian intelligence services. Mr. Mueller interprets a reporter trying to reach out to a news source into conspiracy. U.S. journalists have been accused for decades by authoritarian governments of being spies. Mr. Mueller now promotes this dangerous idea that

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<sup>1</sup> Tim Hamburger and Karen Tumulty, “WikiLeaks releases thousands of documents about Clinton and internal deliberations,” The Washington Post, July 22, 2016, <https://www.washingtonpost.com/news/post-politics/wp/2016/07/22/on-eve-of-democratic-convention-wikileaks-releases-thousands-of-documents-about-clinton-the-campaign-and-internal-deliberations/>.

<sup>2</sup> Patrick Lawrence, "A New Report Raises Big Questions About Last Year’s DNC Hack," The Nation, August 9, 2017; <https://www.thenation.com/article/a-new-report-raises-big-questions-about-last-years-dnc-hack/>.

journalists who are gathering news are engaged in intrigue. But Dr. Corsi trying to contact a news source to learn more details about his widely-announced plans came far too late.

This Complaint documents concerns about the Special Counsel prosecutorial staff's violations of the Rules of Professional Responsibility of the District of Columbia ("D.C.") Bar (which on the points at issue are the same as in other jurisdictions relevant herein). The Special Counsel and the private attorneys whom Mr. Mueller hired as temporary prosecutors have especially violated all of Rule 3:8.

Therefore, this Complaint is also addressed to Bar Counsel for the D.C. Bar, citing the violated Rules, whose violations should be obvious from the facts cited herein.

This Complaint concerns the violations of law and regulation set forth in detail below on or about the date(s) of August 28, 2018 through November 26, 2018, in the County of Morris in the State of New Jersey and in the District of Columbia, mostly in an unmarked Federal Bureau of Investigation's ("FBI") building in Southeast Washington, D.C.

This Complaint also concerns other DOJ personnel. For example, Deputy AG Rosenstein's involvement has already and will violate Rule 3:7 of the Rules of Professional Responsibility known as the "attorney witness rule," as extended by the obligations incumbent upon an attorney who supervises line attorneys and prosecutors.

## **II. PERSONNEL OF SPECIAL PROSECUTOR'S OFFICE**

Special Prosecutor Mueller's office demanded that Dr. Corsi sign the plea agreement attached as Exhibit C, in return for Dr. Corsi testifying against Roger Stone and President Donald Trump (or his campaign) and for leniency in punishment upon pleading guilty to one single count. *See also* Exhibits F, G.

Exhibit C shows that the lead prosecutor encharged with the criminal investigation of Dr. Corsi was (a) Jeannie S. Rhee, assisted by (b) Andrew D. Goldstein, (c) Aaron S.J. Zelinsky, and

(d) L. Rush Atkinson, V of Special Counsel Mueller's office.

Jeannie Rhee was also a lead attorney in a civil lawsuit for the Clinton Foundation of Hillary Clinton and Bill Clinton, including in a lawsuit brought by undersigned counsel Mr. Klayman *arising from the same subject matter* concerning in part the same March 10, 2015 revelations of Secretary Clinton's official emails being diverted through an unsecure private email server. See Notice of Appearance of Jeannie S. Rhee, attached as Exhibit D, dated September 28, 2015 on appeal to the U.S. Court of Appeals for the Eleventh Circuit.

### **III. KNOWLEDGE THAT DEMANDED TESTIMONY WOULD BE FALSE**

Dr. Corsi directly and clearly informed the Special Counsel and his prosecutorial staff that the assertions they wanted Dr. Corsi to testify to would be false and that Dr. Corsi could not testify as they wished without committing perjury in testifying as the Special Counsel's office demanded. In addition, they informed Ms. Rhee in particular that her demand to keep any plea agreement secret and under seal would criminally and civilly violate Dr. Corsi's obligations as a securities dealer, for which he has a valid license, to report the criminal plea to Financial Industry Regulatory Authority ("FINRA"). Thus, Special Counsel Mueller, Ms. Rhee and others on his prosecutorial staff counseled and attempted to coerce Dr. Corsi to commit a felony, all in their zeal to get Dr. Corsi to lie to presumably obtain indictments for other subjects and targets, including but not limited to the President of the United States, Donald J. Trump.

Thus, the Special Counsel and his prosecutorial staff threatened to indict Dr. Corsi, who is now 72 years old, and effectively put him in jail for the rest of his life, unless Dr. Corsi would provide the false testimony that they demanded, even after being informed that the testimony desired would be false. This is criminal.

### **IV. THREATENED PROSECUTION FOR AMENDED TESTIMONY**

The Special Counsel's office seeks to coerce knowingly-false testimony from Dr. Corsi to

falsely “prove” that Dr. Corsi had acted as a liaison between Roger Stone and Wikileaks leader Julian Assange on the one hand and the Trump presidential campaign on the other hand concerning the public release of emails from the email computer servers of the Democratic National Committee (“DNC”).

Dr. Corsi explicitly made clear that he had been unable to review his old emails and thus could not give accurate testimony until he could reloaded emails on his old laptop. The Special Counsel and his prosecutorial staff agreed that Dr. Corsi would have the chance to amend his answers as necessary. When Dr. Corsi received his laptop back from the FBI, he reloaded the 2016 data, and then found an email dated July 25, 2016, in which Roger Stone asked him to “Get to Assange.” He then correctly and honestly amended his answers, as he said he would do.

Now, the Special Counsel’s office is knowingly and deceitfully threatening to charge Dr. Corsi with an alleged false statement during his first interview with the FBI on September, 6, 2018, that he had told them he could not answer with certainty, and which he had amended. When the FBI returned his laptop and he was able to check his past emails, Dr. Corsi promptly amended his answer. See Exhibit E, attached. In sum, the Special Counsel seeks to prosecute statements that were amended.

## **V. GRAND JURY LEAKS**

### **A. Incidents**

Special Prosecutor Mueller convened a second grand jury in the District of Columbia after already convening a grand jury in the Eastern District of Virginia at Alexandria, Virginia. Jurors are drawn from voter rolls, and President Donald Trump received only 4.1% of the vote in the District of Columbia for president on November 8, 2016. President Donald Trump’s campaign was headquartered in Manhattan in New York City, New York. The appearance is that the grand jury in Virginia was skeptical of Mr. Mueller’s presentations and Mr. Mueller sought a different group of

grand jurors to further his corrupt scheme.

A Freedom of Information Act request from Freedom Watch discovered that Special Counsel Mueller's office has had over 9,000 pages of written contacts with the news media. Jonathan Easley, "Exclusive: Judge to rule on release of special counsel's contacts with media," The Hill, May 17, 2018, accessible at: <https://thehill.com/policy/national-security/388146-exclusive-judge-to-rule-on-release-of-special-counsels-contacts-with>. Upon review of ultimately produced documents, it was learned that the press spokesperson, Peter Carr, of the Office of the Special Counsel, engaged in secret meetings at Paul, a French café at 801 Pennsylvania Avenue, N.W., where he orally leaked grand jury and other confidential information to the media, avoiding any written record of the leaks. This needs to be investigated and potentially prosecuted.

In short, details of Special Counsel Mueller's investigation were illegally leaked to the news media concerning the focus of the investigation almost immediately and continuously thereafter, seemingly in real time with no delay:

Federal investigators working for Special Counsel Robert Mueller are keenly focused on President Donald Trump's role in crafting a response to a published article about a meeting between Russians and his son Donald Jr., three sources familiar with the matter told NBC News. The sources told NBC News that prosecutors want to know what Trump knew about the meeting and whether he sought to conceal its purpose.

Julia Ainsley And Tom Winter, "Mueller Team Asking if Trump Tried to Hide Purpose of Trump Tower Meeting," NBC News, August 28, 2017, accessible at: <https://www.nbcnews.com/news/us-news/mueller-team-asking-if-trump-tried-hide-purpose-trump-tower-n796746>.

Special Counsel Mueller's investigative contacts with the Internal Revenue Service were promptly leaked to the news media:

Special counsel Bob Mueller has teamed up with the IRS. According to sources familiar with his investigation into alleged Russian election interference, his probe has enlisted the help of agents from the IRS' Criminal Investigations unit.



Betsy Woodruff, “Mueller Enlists the IRS for His Trump-Russia Investigation,” The Daily Beast, August 31, 2017, accessible at: <http://www.thedailybeast.com/exclusive-mueller-enlists-the-irs-for-his-trump-russia-investigation>.

The Wall Street Journal was also privy to the investigative goals and activities of Special Counsel Mueller’s office:

Special counsel Robert Mueller is examining what role, if any, former national security adviser Mike Flynn may have played in a private effort to obtain Hillary Clinton’s emails from Russian hackers, according to people familiar with the matter. The effort to seek out hackers who were believed to have stolen Mrs. Clinton’s emails, first reported by The Wall Street Journal, was led by a longtime Republican activist, Peter W. Smith.

Shane Harris, “Special Counsel Examines Possible Role Flynn Played in Seeking Clinton Emails From Hackers,” The Wall Street Journal, August 25, 2017, available at: <https://www.wsj.com/articles/special-counsel-examines-possible-role-flynn-played-in-seeking-clinton-emails-from-hackers-1503694304>.

In fact, just about every news media outlet has known exactly what Special Counsel Mueller and his compromised staff is doing on a daily basis:

The letter Mueller is reviewing was drafted by Trump along with policy adviser Stephen Miller, and legal experts say it is possibly the most critical piece of evidence in Mueller's obstruction-of-justice case since Comey’s testimony before the Senate Intelligence Committee in June, because it can give prosecutors a direct window into Trump's thinking shortly before he fired Comey.

Sonam Sheth, “Mueller's investigation just got a boost — and another Trump associate may be in its crosshairs,” Business Insider, September 2, 2017, available at: <https://finance.yahoo.com/news/muellers-investigation-just-got-boost-002052944.html>.

Investigative details of Special Counsel Mueller’s, along with the Attorney General of the State of New York grand jury activities were promptly leaked to the news media.

Special counsel Robert Mueller’s team is working with New York Attorney General Eric Schneiderman on its investigation into Paul Manafort and his financial

transactions, according to several people familiar with the matter.

The cooperation is the latest indication that the federal probe into President Donald Trump's former campaign chairman is intensifying. It also could potentially provide Mueller with additional leverage to get Manafort to cooperate in the larger investigation into Trump's campaign, as Trump does not have pardon power over state crimes.

The two teams have shared evidence and talked frequently in recent weeks about a potential case, these people said. One of the people familiar with progress on the case said both Mueller's and Schneiderman's teams have collected evidence on financial crimes, including potential money laundering.

Josh Dawsey, "Mueller teams up with New York attorney general in Manafort probe," Politico, August 30, 2017, <http://www.politico.com/story/2017/08/30/manafort-mueller-probe-attorney-general-242191>.

Reports of leaks of confidential information from the grand jury investigations hit The Wall Street Journal on August 31, 2017. Peter Nicholas, Erica Orden and Paul Sonne, "Trump Attorneys Lay Out Arguments Against Obstruction-of-Justice Probe to Mueller."

An extraordinary array of documents obtained from Special Counsel Mueller's office are summarized and discussed in this article. In the article, the reporters chronicle that the Trump administration and President Trump's private lawyers would not comment on the memos, indicating that they were not the source of the leaks.

The news media knows the detailed inner workings of the Special Counsel and his prosecutorial staff. As reported by Politico, Mr. Mueller's "most experienced attorneys have discrete targets, such as . . . former national security advisor Michael Flynn . . ." Darren Samuelsohn, "What Mueller's org Chart reveals About his Russia Probe," Politico, Nov. 13, 2017, available at: <https://www.politico.com/story/2017/11/13/robert-mueller-russia-probe-organization-244789>.

Special Counsel Mueller and his prosecutorial staff, by way of example, also leaked to

media outlets, as recently as November 13, 2017, that he and his team are apparently investigating “an alleged plot involving Mr. Flynn, his son and potentially others to forcibly and extra-legally effect the return of Fethullah Gulen to Turkey in exchange for millions of dollars.” Evan Perez, Pamela Brown and Shimon Prokupez, “One year into the FBI's Russia investigation, Mueller is on the Trump money trail,” CNN, August 4, 2017, available at: <http://www.cnn.com/2017/08/03/politics/mueller-investigation-russia-trump-one-year-financial-ties/index.html>.

**B. Legal Standards: Unlawful Leaking of Grand Jury Material**

Federal Rules of Criminal Procedure Rule 6(e)(2) “The Grand Jury” requires that:

(2) \* \* \*

(B) Unless these rules provide otherwise, the following persons must not disclose a matter occurring before the grand jury:

- (i) a grand juror;
- (ii) an interpreter;
- (iii) a court reporter;
- (iv) an operator of a recording device;
- (v) a person who transcribes recorded testimony;
- (vi) an attorney for the government; or
- (vii) a person to whom disclosure is made under Rule 6(e)(3)(A)(ii) or (iii).

(3) *Exceptions.*

(A) Disclosure of a grand-jury matter—other than the grand jury's deliberations or any grand juror's vote—may be made to:

- (i) an attorney for the government for use in performing that attorney's duty;
- (ii) any government personnel—including those of a state, state subdivision, Indian tribe, or foreign government—that an attorney for the government considers necessary to assist in performing that attorney's duty to enforce federal criminal law; or
- (iii) a person authorized by 18 U.S.C. §3322.

(B) A person to whom information is disclosed under Rule 6(e)(3)(A)(ii) may use that information only to assist an attorney for the government in performing that attorney's duty to enforce federal criminal law. An attorney for the government must promptly provide the court that impaneled the grand jury with the names of all persons to whom a disclosure has been made, and must certify that the attorney has advised those persons of their obligation of secrecy under this rule.

(C) An attorney for the government may disclose any grand-jury matter to another federal grand jury.

\* \* \*

Furthermore, Rule 6(e)(7) provides that:

(7) *Contempt*. A knowing violation of Rule 6, or of any guidelines jointly issued by the Attorney General and the Director of National Intelligence under Rule 6, may be punished as a contempt of court.

## **VI. GOVERNING LAW AND AUTHORITIES: WITNESS TAMPERING**

### **A. Special Prosecutor And Staff Guilty Of Witness Tampering, Witness Intimidation, And Blackmail**

Special Prosecutor Robert Mueller and his prosecutorial staff, particularly Rhee, Goldstein, Zelinsky, and Atkinson, have threatened a witness and tampered with a witness, Dr. Corsi, to criminally coerce him into providing false testimony and in fact also withholding or suppressing truthful testimony.

Those prosecutors hired and operating under the direction of Special Counsel Robert Mueller want Dr. Corsi to falsely testify that he and Roger Stone acted as go-betweens (alone or through additional links and contacts) between the 2015-2016 presidential campaign of Donald J. Trump and the Russian government through Wikileaks founder and leader Julian Assange. Faced with what was deceptively proposed by the Special Counsel to appear like an easy, sweetheart plea deal, Dr. Corsi has refused because such testimony would be a lie. Dr. Corsi has been accused of telling a lie when he is telling the truth. Under threat of indictment and eventual conviction which could effectively result in life imprisonment as Dr. Corsi is now 72 years old, Dr. Corsi has been criminally threatened and coerced to tell a lie and call it the truth. Dr. Corsi refuses to lie. He has stated publicly that he will not one day stand before God having lied; nor will he participate in a slow-motion coup against the president that would be to the detriment of his nation and the next generations by lying. And if he avoids a charge of lying by lying, he could never be confident that his constitutional and other legal rights will again be compromised, as apparently has already occurred with other subjects and targets of Special Counsel Mueller's run-a-way and politically motivated investigation.

## **18 U.S. Code § 1513 - Retaliating against a witness, victim, or an informant**

\* \* \*

**(e)** Whoever knowingly, with the intent to retaliate, takes any action harmful to any person, including interference with the lawful employment or livelihood of any person, for providing to a law enforcement officer any truthful information relating to the commission or possible commission of any Federal offense, shall be fined under this title or imprisoned not more than 10 years, or both.

**(f)** Whoever conspires to commit any offense under this section shall be subject to the same penalties as those prescribed for the offense the commission of which was the object of the conspiracy.

**(g)** A prosecution under this section may be brought in the district in which the official proceeding (whether pending, about to be instituted, or completed) was intended to be affected, or in which the conduct constituting the alleged offense occurred.

## **18 U.S. Code § 1512 - Tampering with a witness, victim, or an informant**

\* \* \*

**(b)**Whoever knowingly uses intimidation, threatens, or corruptly persuades another person, or attempts to do so, or engages in misleading conduct toward another person, with intent to—

**(1)** influence, delay, or prevent the testimony of any person in an official proceeding;

**(2)** cause or induce any person to—

**(A)** withhold testimony, or withhold a record, document, or other object, from an official proceeding;

**(B)** alter, destroy, mutilate, or conceal an object with intent to impair the object's integrity or availability for use in an official proceeding;

**(C)** evade legal process summoning that person to appear as a witness, or to produce a record, document, or other object, in an official proceeding; or

**(D)** be absent from an official proceeding to which such person has been summoned by legal process; or

**(3)** hinder, delay, or prevent the communication to a law enforcement officer or judge of the United States of information relating to the commission or possible commission of a Federal offense or a violation of conditions of probation [1] supervised release,,[1] parole, or release pending judicial proceedings;

shall be fined under this title or imprisoned not more than 20 years, or both.

\* \* \*

**(e)** In a prosecution for an offense under this section, it is an affirmative defense, as to which the defendant has the burden of proof by a preponderance of the evidence, that the conduct consisted solely of lawful conduct and that the

defendant's sole intention was to encourage, induce, or cause the other person to testify truthfully.

(f) For the purposes of this section—

(1) an official proceeding need not be pending or about to be instituted at the time of the offense; and

(2) the testimony, or the record, document, or other object need not be admissible in evidence or free of a claim of privilege.

\* \* \*

(k) Whoever conspires to commit any offense under this section shall be subject to the same penalties as those prescribed for the offense the commission of which was the object of the conspiracy.

### **18 U.S. Code § 1505 - Obstruction of proceedings before departments, agencies, and committees**

\* \* \*

Whoever corruptly, or by threats or force, or by any threatening letter or communication influences, obstructs, or impedes or endeavors to influence, obstruct, or impede the due and proper administration of the law under which any pending proceeding is being had before any department or agency of the United States, or the due and proper exercise of the power of inquiry under which any inquiry or investigation is being had by either House, or any committee of either House or any joint committee of the Congress—

Shall be fined under this title, imprisoned not more than 5 years or, if the offense involves international or domestic terrorism (as defined in section 2331), imprisoned not more than 8 years, or both.

#### **B. Conspiracy to Suborn Perjury**

The Special Prosecutor and his prosecutorial staff conspired to suborn perjury in violation of 18 U.S. Code § 1622 by seeking to threaten Dr. Corsi into testifying falsely with the Special Prosecutor's office sponsoring and using in court testimony by Dr. Corsi that they have been informed would be false testimony.

Conspiracy to suborn perjury may be prosecuted irrespective of whether perjury has been committed. The two witness rule does not apply in conspiracy prosecutions. *See* DOJ Criminal Resource Manual, 1752 Subornation of Perjury.

Solicitation of perjured testimony also may be prosecuted as obstruction of justice irrespective of whether the perjured testimony took place. *United States v. Silverman*, 745 F.2d

1386, 1395 (11th Cir. 1984). Because the crime of subornation of perjury is distinct from that of perjury, the suborner and perjurer are not accomplices; however, a person who causes a false document to be introduced through an innocent witness can be held liable as a principal under 18 U.S.C. § 2(b). *United States v. Walser*, 3 F.3d 380, 388 (11th Cir. 1993).

Physical coercion need not be proven in prosecutions for subornation of perjury. *United States v. Heater*, 63 F.3d 311, 320 (4th Cir. 1995), *cert. denied*, 116 S. Ct. 796 (1996).

### **C. Special Counsel’s Office Proposed to Violate 18 U.S.C. § 1001**

Although an act of supreme irony, the Special Counsel and his prosecutorial staff have attempted to and conspired to violate 18 U.S.C. § 1001 while threatening Dr. Corsi with indictment and prosecution for violating the same statute. Knowing the testimony they wanted Dr. Corsi to give to be actually false – including having been repeatedly told by Dr. Corsi that the assertions are false – the Special Counsel’s office nevertheless insisted upon using the false testimony they wanted to get from Dr. Corsi in court proceedings and indictments against other persons.

A violation of 18 U.S.C. § 1001 carries a maximum sentence of 5 years’ imprisonment; a fine of \$250,000, pursuant to 18 U.S.C. § 3571(b)(3); a term of supervised release of not more than 3 years, pursuant to 18 U.S.C. § 3583(b)(2); and an obligation to pay any applicable interest or penalties on fines and restitution not timely made.

### **18 U.S. Code § 1001 - Statements or entries generally**

**(a)** Except as otherwise provided in this section, whoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully—

**(1)** falsifies, conceals, or covers up by any trick, scheme, or device a material fact;

**(2)** makes any materially false, fictitious, or fraudulent statement or representation; or

**(3)** makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry;

shall be fined under this title, imprisoned not more than 5 years or, if

the offense involves international or domestic terrorism (as defined in section 2331), imprisoned not more than 8 years, or both. If the matter relates to an offense under chapter 109A, 109B, 110, or 117, or section 1591, then the term of imprisonment imposed under this section shall be not more than 8 years.

**(b)** Subsection (a) does not apply to a party to a judicial proceeding, or that party's counsel, for statements, representations, writings or documents submitted by such party or counsel to a judge or magistrate in that proceeding.

**(c)** With respect to any matter within the jurisdiction of the legislative branch, subsection (a) shall apply only to—

**(1)** administrative matters, including a claim for payment, a matter related to the procurement of property or services, personnel or employment practices, or support services, or a document required by law, rule, or regulation to be submitted to the Congress or any office or officer within the legislative branch; or

**(2)** any investigation or review, conducted pursuant to the authority of any committee, subcommittee, commission or office of the Congress, consistent with applicable rules of the House or Senate.

Notwithstanding the limitation of 18 U.S. Code § 1001(b) as to statements or submissions to a judge or magistrate, it is clear that the Special Counsel and his prosecutorial staff (a) are using and will use the false testimony by Dr. Corsi and other intimidated witnesses before the grand jury against other innocent victims of this prosecutorial misconduct, and (b) will use the false testimony procured by misconduct in a report to the Acting Attorney General and presumably (probably through the artifice of making the report “through” the Attorney General or other government officials, but with the intent that it primarily influence the Congress) in order to put forth false testimony to support Articles of Impeachment against President Trump and/or indictment of other persons.

Thus, ironically and egregiously, the Special Prosecutor's office is seeking to make false statements prohibited under 18 U.S. Code § 1001 to DOJ supervisors and senior leadership, Congress, and the grand jury by forcing Dr. Corsi to provide false testimony that they know is false.



#### **D. Extortion by Government Officials**

##### **18 U.S. Code § 872 - Extortion by officers or employees of the United States**

Whoever, being an officer, or employee of the United States or any department or agency thereof, or representing himself to be or assuming to act as such, under color or pretense of office or employment commits or attempts an act of extortion, shall be fined under this title or imprisoned not more than three years, or both; but if the amount so extorted or demanded does not exceed \$1,000, he shall be fined under this title or imprisoned not more than one year, or both

Although extortion is most commonly understood as the obtaining of tangible or intangible property, the crime of extortion is at times defined as an act to gain “advantage.”

#### **E. Government Officials Can Be Guilty of Violating Criminal Laws**

The fact that the Special Prosecutor and his prosecutorial staff have committed witness threats, intimidation, and/or tampering and committed by his prosecutorial staff (hired on a temporary basis by Special Prosecutor Mueller) does not alter the criminality of a violation of the statutes cited above. It has long been recognized, for example, that employees of a government agency may operate it corruptly as an “enterprise” under the Racketeer Influenced and Corrupt Organization Act: “For example, an arson ring can be a RICO enterprise, as can a small business or government agency.” Staff of the Organized Crime and Gang Section, U.S. Department of Justice, CRIMINAL RICO: 18 U.S.C. §§1961-1968. A Manual For Federal Prosecutors, Sixth Revised Edition, May 2016, page 2.

#### **F. Special Prosecutor Violated Professional Rules for Prosecutors**

The Special Counsel and his prosecutorial staff have clearly violated the rules applying to prosecutors:

##### **Rules of Professional Conduct: Rule 3.8--Special Responsibilities of a Prosecutor**

The prosecutor in a criminal case shall not:

(a) In exercising discretion to investigate or to prosecute, improperly favor or

- invidiously discriminate against any person;
- (b) File in court or maintain a charge that the prosecutor knows is not supported by probable cause;
  - (c) Prosecute to trial a charge that the prosecutor knows is not supported by evidence sufficient to establish a prima facie showing of guilt;
  - (d) Intentionally avoid pursuit of evidence or information because it may damage the prosecution's case or aid the defense;
  - (e) Intentionally fail to disclose to the defense, upon request and at a time when use by the defense is reasonably feasible, any evidence or information that the prosecutor knows or reasonably should know tends to negate the guilt of the accused or to mitigate the offense, or in connection with sentencing, intentionally fail to disclose to the defense upon request any unprivileged mitigating information known to the prosecutor and not reasonably available to the defense, except when the prosecutor is relieved of this responsibility by a protective order of the tribunal;
  - (f) Except for statements which are necessary to inform the public of the nature and extent of the prosecutor's action and which serve a legitimate law enforcement purpose, make extrajudicial comments which serve to heighten condemnation of the accused; or
  - (g) In presenting a case to a grand jury, intentionally interfere with the independence of the grand jury, preempt a function of the grand jury, abuse the processes of the grand jury, or fail to bring to the attention of the grand jury material facts tending substantially to negate the existence of probable cause.

#### Comment

[1] A prosecutor has the responsibility of a minister of justice and not simply that of an advocate. This responsibility carries with it specific obligations to see that the defendant is accorded procedural justice and that guilt is decided upon the basis of sufficient evidence. \* \* \*

\* \* \*

In violation of Rule 3.8(b), the Special Counsel and his prosecutorial staff are threatening to indict Dr. Corsi for a charge that they know is not even supported by probable cause.

In violation of Rule 3.8(c), the Special Counsel and his prosecutorial staff are threatening to prosecute to trial a charge that they know is not supported by evidence sufficient to establish a prima facie showing of guilt by Dr. Corsi.

In violation of Rule 3.8(d), the Special Counsel and his prosecutorial staff are operating under severe conflicts of interest by intentionally avoiding pursuit of evidence or information that would damage the prosecution's case and aid the defense by revealing alternative interpretations of

ambiguous documents and events, exculpatory evidence, and actual guilt by other persons.

In violation of Rule 3.8(e), the Special Counsel and his prosecutorial staff are intentionally failing to disclose to various defendants that the testimony procured from various witnesses is known to be false but was obtained by coercion. Thus, as part of the requested investigation, Dr. Corsi demands release of his grand jury testimony and the FBI 302 reports of his interviews, which evidence will show the unethical, illegal and criminal acts alleged herein. This grand jury testimony and the FBI 302's should be ordered to be immediately produced to Dr. Corsi as well as the recipients of this Complaint.

In violation of Rule 3.8(f), the Special Counsel and his prosecutorial staff are rampantly engaging in leaks to the news media extrajudicial comments which serve to heighten condemnation of the accused, all of which are intended to harm him and others regardless of any ensuing indictments.

**G. Special Prosecutor's Staff Obligated to Obey Ethics Rules, Law**

The Special Counsel and his staff are legally obligated under DOJ regulations to comply with the Rules of Professional Conduct of the District of Columbia Bar (Amended), which are similar in most or all states following the ABA Model Rules.

DOJ regulations are also extended to a Special Counsel under **28 C.F.R. § 600.7 Conduct and accountability:**

**(a)** A Special Counsel shall comply with the rules, regulations, procedures, practices and policies of the Department of Justice. He or she shall consult with appropriate offices within the Department for guidance with respect to established practices, policies and procedures of the Department, including ethics and security regulations and procedures. Should the Special Counsel conclude that the extraordinary circumstances of any particular decision would render compliance with required review and approval procedures by the designated Departmental component inappropriate, he or she may consult directly with the Attorney General.

(b) The Special Counsel shall not be subject to the day-to-day supervision of any official of the Department. However, the Attorney General may request that the Special Counsel provide an explanation for any investigative or prosecutorial step, and may after review conclude that the action is so inappropriate or unwarranted under established Departmental practices that it should not be pursued. In conducting that review, the Attorney General will give great weight to the views of the Special Counsel. If the Attorney General concludes that a proposed action by a Special Counsel should not be pursued, the Attorney General shall notify Congress as specified in § 600.9(a)(3).

(c) The Special Counsel and staff shall be subject to disciplinary action for misconduct and breach of ethical duties under the same standards and to the same extent as are other employees of the Department of Justice. Inquiries into such matters shall be handled through the appropriate office of the Department upon the approval of the Attorney General.

(d) The Special Counsel may be disciplined or removed from office only by the personal action of the Attorney General. The Attorney General may remove a Special Counsel for misconduct, dereliction of duty, incapacity, conflict of interest, or for other good cause, including violation of Departmental policies. The Attorney General shall inform the Special Counsel in writing of the specific reason for his or her removal.

Those requirements that Special Counsel Mueller and his staff must comply with include:

**28 U.S. Code § 530B - Ethical standards for attorneys for the Government**

(a) An attorney for the Government shall be subject to State laws and rules, and local Federal court rules, governing attorneys in each State where such attorney engages in that attorney's duties, to the same extent and in the same manner as other attorneys in that State.

(b) The Attorney General shall make and amend rules of the Department of Justice to assure compliance with this section.

(c) As used in this section, the term "attorney for the Government" includes any attorney described in section 77.2(a) of part 77 of title 28 of the Code of Federal Regulations and also includes any independent counsel, or employee of such a counsel, appointed under chapter 40.

**5 C.F.R. § 3801.101 General**

In accordance with § 2635.105 of this title, the regulations in this part apply to employees of the Department of Justice and supplement the Standards of Ethical Conduct for Employees of the Executive Branch in part 2635 of this title. In addition to the regulations contained in part 2635 of this title and in this part,

employees are subject to the conduct regulations contained in part 735 of this title and 28 CFR part 45.

**28 CFR § 45.12 Reporting to the Department of Justice Office of Professional Responsibility.**

Department employees have a duty to, and shall, report to the Department of Justice Office of Professional Responsibility (DOJ-OPR), or to their supervisor, or their component's internal affairs office for referral to DOJ-OPR, any allegations of misconduct by a Department attorney that relate to the exercise of the attorney's authority to investigate, litigate or provide legal advice, as well as allegations of misconduct by law enforcement personnel when such allegations are related to allegations of attorney misconduct within the jurisdiction of DOJ-OPR.

Furthermore, as set forth in the DOJ's ethics handbook, and codified by statute, DOJ attorneys must "act impartially and not give preferential treatment to any private organization or individual," 5 C.F.R 2635.101(b), and ". . . shall not engage in criminal, infamous, dishonest, immoral, or disgraceful conduct, or other conduct prejudicial to the government." 5 CFR735.203.

**VII. SPECIAL COUNSEL MUELLER AND HIS PROSECUTORIAL STAFF'S CONFLICTS OF INTEREST**

28 CFR 45.2 mandates that no DOJ employee may participate in a criminal investigation or prosecution if he or she has a personal or political relationship with any person or organization substantially involved in the conduct that is the subject of the investigation or prosecution, or who would be directly affected by the outcome.

Mr. Mueller and his team suffer from numerous conflicts of interest that mandate their removal. More than half of Mr. Mueller's massive team of lawyers are influential donors to the Democrat party investigating the presidential campaign of a Republican President, Donald Trump.

Rule 3:8(d) of the Rules of Professional Conduct of the D.C. Bar mandates that a prosecutor may not "(d) *Intentionally avoid pursuit of evidence or information* because it may damage the prosecution's case or aid the defense." (emphasis added). Jeannie Rhee's previous work for the Clinton Foundation and the Clintons would prevent her from exploring evidence or

explanations that might point to criminal or even unethical actions of the President Trump's adversary in the 2016 campaign, including alternative explanations of allegations, the \$12 million that Hillary Clinton's campaign trolled through the Russian intelligence community through the law firm of Perkins Coie and former British spy Christopher Steele. Steele going to Moscow and throwing money around looking for what Russia's intelligence services might know about President Trump would invite Russia's spy agencies to enthusiastically concoct disinformation to fill the demand provided by the Clinton campaign's \$12 million expenditure.

Rhee could not ethically explore information or explanations that would be harmful to her own past client, the Clinton Foundation and the Clinton family. Rhee could not do her job as a prosecutor to dispassionately and fully explore the facts where the evidence leads for her current client (the U.S. Government) without violating her duty of loyalty to her past client the Clinton Foundation.

Rule 1.7 of the Rules of Professional Conduct of the D.C. Bar requires that:

\* \* \*

(b) Except as permitted by paragraph (c) below, a lawyer shall not represent a client with respect to a matter if:

- (1) That matter involves a specific party or parties and a position to be taken by that client in that matter is adverse to a position taken or to be taken by another client in the same matter even though that client is unrepresented or represented by a different lawyer;
- (2) Such representation will be or is likely to be adversely affected by representation of another client;
- (3) Representation of another client will be or is likely to be adversely affected by such representation;
- (4) The lawyer's professional judgment on behalf of the client will be or reasonably may be adversely affected by the lawyer's responsibilities to or interests in a third party or the lawyer's own financial, business, property, or personal interests.

\* \* \*

If the evidence shows that Russia intervened in the election on behalf of Hillary Clinton because of her support for the sale of twenty percent (20%) of the uranium mining reserves of

the United States to the Russian Federation as the leading member of the inter-governmental decision-making body the Committee on Foreign Investment in the United States (“CFIUS”), Mr. Mueller and his team would be ethically prohibited from honestly exploring the truth.

As recently as 2009, then Director of the FBI, Special Counsel Mueller personally carried samples of highly-enriched uranium to Moscow,<sup>3</sup> as shown in official diplomatic cables that have been publicly released. Compared with the professional permanent staff of the FBI and USDOJ, Mr. Mueller cannot offer public confidence in the investigation having personally worked with Russia on such high level issues.<sup>4</sup>

Special Counsel Mueller knowingly hired an attorney who had previously – within the preceding year from her hiring – represented the Clinton Foundation of whom Hillary Clinton and Bill Clinton are principals. *See* Exhibit D. Having previously represented the Clinton Foundation, its Board of Directors and principals Hillary Clinton, Bill Clinton, Chelsea Clinton, and Former Counselor of the U.S. Department of State Cheryl Mills, Ms. Rhee ethically cannot investigate, work on, or prosecute possible collusion by Russia with Trump’s presidential campaign running against Hillary Clinton.

Mr. Mueller’s hiring of Ms. Rhee and others is in itself an ethical violation of DOJ standards and professional rules. With Mr. Mueller’s array of experience, he obviously knows that

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<sup>3</sup> John Solomon, “Mueller may have a conflict — and it leads directly to a Russian oligarch,” *The Hill*, May 14, 2018, <https://thehill.com/opinion/white-house/387625-mueller-may-have-a-conflict-and-it-leads-directly-to-a-russian-oligarch>.

<sup>4</sup> “(S/NF) Background: Over two years ago Russia requested a ten-gram sample of highly enriched uranium (HEU) seized in early 2006 in Georgia during a nuclear smuggling sting operation involving one Russian national and several Georgian accomplices. The seized HEU was transferred to U.S. custody and is being held at a secure DOE facility. In response to the Russian request, the Georgian Government authorized the United States to share a sample of the material with the Russians for forensic analysis.” *WIKILEAKS*, [https://wikileaks.org/plusd/cables/09STATE85588\\_a.html](https://wikileaks.org/plusd/cables/09STATE85588_a.html); Joe Hoft, “Crooked Former FBI Head Mueller Hand Delivered Uranium to Russians on Airport Tarmac,” *The GateWay Pundit*, October 22, 2017, <https://www.thegatewaypundit.com/2017/10/crooked-former-fbi-head-mueller-hand-delivered-uranium-to-russians-on-an-airport-tarmac-hand-picked-by-hillary/>.

the lawyers he is hiring are legally and ethically compromised and prevented from following the evidence wherever it leads. One must infer that Mr. Mueller intends a hatchet job on President Trump in retaliation for his friend, Mr. Comey, and his firing from head of the FBI.

Two other lawyers on Mr. Mueller's team gave the maximum \$2,700 donation to Hillary Clinton in last year's elections of 2016. Three attorneys on Mr. Mueller's team – Andrew Weissmann, Jeannie Rhee, and James Quarles – alone donated more than \$50,000 to Democrats,<sup>5</sup> and almost exclusively to Democrats, according to Federal Election Commission campaign finance reports. All told, more than half of Mueller's massive team of lawyers are donors to the Democrat party investigating the presidential campaign of a Republican Donald Trump.<sup>6</sup>

It is widely known that Mr. Weissmann was even an invitee to presidential candidate Hillary Clinton's anticipated victory party on the night of the 2016 presidential election. He has also been implicated in illegal prosecutions of the past, involving the infamous Enron scandal.

## **VIII. CONSPIRACY TO VIOLATE SECURITIES REGULATIONS**

Furthermore, the Special Counsel staff demanded that Dr. Corsi enter into a plea agreement accepting conviction for a felony count of perjury, yet keep the entire arrangement secret. Dr. Corsi warned the Special Counsel attorneys that that arrangement would be illegal under Financial Industry Regulatory Authority ("FINRA") regulations, because Dr. Corsi holds a securities license.

### **FINRA Rule 4530. Reporting Requirements**

(a) Each member shall promptly report to FINRA, but in any event not later than 30 calendar days, after the member knows or should have known of the existence of any of the following:

---

<sup>5</sup> Marshall Cohen, *Special counsel team members donated to Dems, FEC records show*, CNN, June 13, 2017, available at: <http://www.cnn.com/2017/06/12/politics/robert-mueller-donations-democrats-fec/index.html>.

<sup>6</sup> Alexi McCammond, "Meet Bob Mueller's team tackling the Russia probe," *AXIOS*, June 18, 2017, accessible at: <https://www.axios.com/meet-bob-muellers-dream-team-tackling-the-russia-investigation-2443472267.html>



(1) the member or an associated person of the member:

\* \* \*

(E) is indicted, or convicted of, or pleads guilty to, or pleads no contest to, any felony; or any misdemeanor that involves the purchase or sale of any security, the taking of a false oath, the making of a false report, bribery, perjury, burglary, larceny, theft, robbery, extortion, forgery, counterfeiting, fraudulent concealment, embezzlement, fraudulent conversion, or misappropriation of funds, or securities, or a conspiracy to commit any of these offenses, or substantially equivalent activity in a domestic, military or foreign court;

\* \* \*

(f) Each member shall promptly file with FINRA copies of:

(1) any indictment, information or other criminal complaint or plea agreement for conduct reportable under paragraph (a)(1)(E) of this Rule;

\* \* \*

Yet, the Special Counsel's staff insisted that Dr. Corsi would be indicted unless he not only agreed to plead guilty to a felony of perjury but also kept the arrangement secret in violation of FINRA Rule 4530.

## **IX. FURTHER VIOLATIONS OF RULES OF PROFESSIONAL CONDUCT**

At issue is the misconduct of the Special Counsel and his prosecutorial staff, in particular (a) Jeannie S. Rhee, (b) Andrew D. Goldstein, (c) Aaron S.J. Zelinsky, and (d) L. Rush Atkinson, of Special Counsel Mueller's office.

In violation of Rule 3.8, these prosecutors are discriminating against Dr. Corsi – as they have made explicitly clear during interviews – and others because they disagree with his political views and activities, threatened to file in court a charge or charges that they know are not supported by probable cause or any accurate facts, prosecute a charge or charges that they know are not supported by evidence sufficient to establish a prima face showing of guilt, intentionally avoid discovering and exploring the actual truth of the events they are charged with investigating in order to allege guilt of the innocent and to excuse the guilty, engage in rampant leaks of grand jury

material and smear the innocent through extrajudicial leaks and statements, abuse the processes of the grand jury, and fail to bring to the attention of the grand jury material facts tending substantially to negate the existence of probable cause.

**Rules of Professional Conduct of the D.C. Bar** (emphases added):

**Rule 3.8--Special Responsibilities of a Prosecutor**

The prosecutor in a criminal case shall not:

(a) In exercising discretion to investigate or to prosecute, improperly favor or invidiously discriminate against any person;

(b) *File in court or maintain a charge that the prosecutor knows is not supported by probable cause;*

(c) *Prosecute to trial a charge that the prosecutor knows is not supported by evidence sufficient to establish a prima facie showing of guilt;*

(d) *Intentionally avoid pursuit of evidence or information because it may damage the prosecution's case or aid the defense;*

\* \* \*

(f) Except for statements which are necessary to inform the public of the nature and extent of the prosecutor's action and which serve a legitimate law enforcement purpose, *make extrajudicial comments which serve to heighten condemnation of the accused;* or

(g) In presenting a case to a grand jury, intentionally interfere with the independence of the grand jury, preempt a function of the grand jury, *abuse the processes of the grand jury, or fail to bring to the attention of the grand jury material facts tending substantially to negate the existence of probable cause.*

In violation of Rule 8.4, these prosecutors are engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation; committing criminal acts that reflect adversely on their honesty, trustworthiness, or fitness as a lawyer in other respects; and seek or threaten to seek criminal charges solely to obtain advantage in a political matter, to change the political direction and leadership of our country.

**Rule 8.4--Misconduct**

It is professional misconduct for a lawyer to:

\* \* \*

(b) Commit a criminal act that reflects adversely on the lawyer's honesty, trustworthiness, or fitness as a lawyer in other respects;

(c) *Engage in conduct involving dishonesty, fraud, deceit, or misrepresentation;*

\* \* \*

(g) *Seek or threaten to seek criminal charges* or disciplinary charges solely to obtain an advantage in a civil matter.

**Rules of Professional Conduct: Rule 4.4--Respect for Rights of Third Persons**

(a) In representing a client, *a lawyer shall not use means that have no substantial purpose other than to embarrass, delay, or burden a third person, or knowingly use methods of obtaining evidence that violate the legal rights of such a person.*

(b) \* \* \*

In violation of Rule 8.4, these prosecutors are attempting to make false statements of material facts to the courts and the Congress, and the American people. They are also intending to disclose and have already through illegal grand jury leaks failed to disclose material facts contradicting their false narratives.

**Rule 4.1--Truthfulness in Statements to Others**

In the course of representing a client, a lawyer shall not knowingly:

- (a) *Make a false statement of material fact or law to a third person;* or
- (b) *Fail to disclose a material fact to a third person* when disclosure is necessary to avoid assisting a criminal or fraudulent act by a client, unless disclosure is prohibited by Rule 1.6.

In violation of Rule 3.1, these prosecutors are attempting to prosecute Dr. Corsi or to use false testimony from Dr. Corsi to prosecute others when there is no basis in and fact.

**Rule 3.1--Meritorious Claims and Contentions**

A lawyer shall not bring or defend a proceeding, or assert or controvert an issue therein, unless there is a basis in law and fact for doing so that is not frivolous, which includes a good-faith argument for an extension, modification, or reversal of existing law. \* \* \*

In violation of Rule 3.3, these prosecutors are attempting to offer evidence to the courts, the grand jury and the public that they know to be false, present false claims and statements against Dr. Corsi or manufacture false testimony from Dr. Corsi to prosecute him and others when there is no basis to do so, and fail to amend, as promised, statements previously made by Dr. Corsi.

**Rule 3.3--Candor to Tribunal**

(a) A lawyer shall not knowingly:

- (1) Make a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to

the tribunal by the lawyer, unless correction would require disclosure of information that is prohibited by Rule 1.6;

\* \* \*

(4) Offer evidence that the lawyer knows to be false, except as provided in paragraph (b). A lawyer may refuse to offer evidence, other than the testimony of a defendant in a criminal matter, that the lawyer reasonably believes is false.

\* \* \*

(c) The duties stated in paragraph (a) continue to the conclusion of the proceeding.

(d) A lawyer who receives information clearly establishing that a fraud has been perpetrated upon the tribunal shall promptly take reasonable remedial measures, including disclosure to the tribunal to the extent disclosure is permitted by Rule 1.6(d).

## **X. CONSPIRACY TO COMMIT TREASON**

Special Counsel Mueller and his prosecutorial staff, the majority of whom are partisan Democrats and supporters of Hillary Clinton, whom he has intentionally hired, are effectively engaged in a “coup” against the United States and are working to overthrow the duly elected President of the United States, elected and empowered by the voters pursuant to the U.S. Constitution. One of the primary vehicles and means in doing so is the illegal, criminal and unethical conduct of the Special Counsel and his prosecutorial staff with regard to Dr. Corsi, as set forth above.

### **18 U.S. Code § 371 - Conspiracy to commit offense or to defraud United States**

If two or more persons conspire either to commit any offense against the United States, or to defraud the United States, or any agency thereof in any manner or for any purpose, and one or more of such persons do any act to effect the object of the conspiracy, each shall be fined under this title or imprisoned not more than five years, or both.

If, however, the offense, the commission of which is the object of the conspiracy, is a misdemeanor only, the punishment for such conspiracy shall not exceed the maximum punishment provided for such misdemeanor.

### **18 U.S. Code § 2384 - Seditious conspiracy**

If two or more persons in any State or Territory, or in any place subject to the jurisdiction of the United States, conspire to overthrow, put down, or to destroy

by force the Government of the United States, or to levy war against them, or to oppose by force the authority thereof, or by force to prevent, hinder, or delay the execution of any law of the United States, or by force to seize, take, or possess any property of the United States contrary to the authority thereof, they shall each be fined under this title or imprisoned not more than twenty years, or both.

## **XI. CONCLUSION**

The Special Counsel and his prosecutorial staff of the DOJ by threatening to prosecute Dr. Corsi have ignored the principles and standards incumbent upon attorneys carrying out some of the most serious tasks in the legal profession at the highest levels. The DOJ is no place for ethical half-measures or cutting corners in compliance with laws and regulations. Indeed, the Special Counsel and his prosecutorial staff have themselves committed crimes and committed some of the very criminal offenses that they are investigating and charging others with.

On behalf of Dr. Corsi, we hereby respectfully demand that the DOJ open criminal and professional ethics investigations into these actions by Special Counsel Robert Mueller and the prosecutorial staff he hired as DOJ prosecutors for the duration of his charge, particularly those Special Prosecutor attorneys and media staff identified above directly involved in these events concerning Dr. Corsi.

DOJ is asked to further investigate the implementation of legal requirements and ethical standards in the Office of the Special Prosecutor with regard to the treatment of Dr. Corsi. We ask that the DOJ leadership and the District of Columbia Bar reassure the American people not in disingenuous words but in solid and unambiguous deeds that we can trust government and the legal system after so many examples eroding public confidence. We ask that the DOJ's leadership and the District of Columbia Bar Disciplinary Counsel undertake unbiased independent investigations, move swiftly to enforce DOJ regulations, congressional statutes and much more the Constitution, as well as legal and ethical obligations of the profession with regard to the prosecutorial misconduct, dishonesty, lying, conflicts of interest and other illegal actions

as set forth herein of the Special Counsel and his prosecutorial staff.

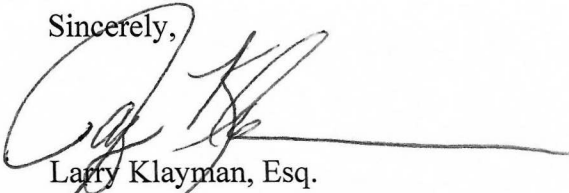
Dr. Corsi will fully cooperate with the requested investigations and respectfully requests meetings expeditiously with both the Acting Attorney General, OPR and the IG, and the District of Columbia Bar Disciplinary Counsel to further this Complaint and the ensuing investigations. Time is of the essence, as these criminal and otherwise illegal and unprofessional activities are continuing and causing irreparable harm.

Dr. Corsi does not want the injustice inflicted upon him to be inflicted upon anyone else. Dr. Corsi has also offered testimony to the Special Counsel and his prosecutorial staff on other relevant issues, such as the uncontroverted collusion between the Hillary Clinton presidential campaign and the DNC but they did not want to hear it, underscoring the political nature of the Special Counsel's so-called Russian collusion investigation, which the president and others have labeled a "witch hunt."

Dr. Corsi submits that upon an expedited and full investigation of the facts and analysis of the law set forth herein, that Special Counsel Mueller and members of his prosecutorial staff, as well as his press spokesperson Peter Carr who have apparently been engaged and complicit in illegally releasing to the media grand jury information and testimony, be referred to appropriate authorities, federal state and state, for criminal prosecution.

In addition, Special Counsel Mueller and his prosecutorial staff should respectfully be removed from his office and their practice of the law and a new Special Counsel appointed who respects and will obey common and accepted norms of professional ethics and the law and who will promptly conclude the so-called Russian collusion investigation which had been illegally and criminally spinning out of control, furthered by complicit incompetent and unethical "oversight" under Deputy Attorney General Rod Rosenstein, whose conflicts of interest and actions also need to be investigated and remedied.

Sincerely,

A handwritten signature in black ink, appearing to read 'Larry Klayman', with a long horizontal line extending to the right.

Larry Klayman, Esq.

Legal Counsel for Dr. Corsi and Submitted on His Behalf

cc: David E. Gray, Esq w/ enclosures  
Gray Law Group  
760 Route 10 West  
Suite 204  
Whippany, N.J. 07981  
Tel: 973-240-7313  
dgray@graylawgroupnj.com

**SIGNED CERTIFICATION BY DR. JEROME CORSI OF HIS COMPLAINTS  
FILED WITH THE OFFICE OF DISCIPLINARY COUNSEL OF THE BOARD  
ON PROFESSIONAL RESPONSIBILITY OF THE DISTRICT OF COLUMBIA  
BAR AND THE DISTRICT OF COLUMBIA COURT OF APPEALS**





**OFFICE OF DISCIPLINARY COUNSEL**  
**THE BOARD ON PROFESSIONAL RESPONSIBILITY**  
**DISTRICT OF COLUMBIA COURT OF APPEALS**

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(Please print or type)

Date: December 3, 2018

A. Your Name: (Dr.)  
(Mr.)  
(Ms.)  
(Mrs.) Dr. Jerome R. Corsi, Ph.D.  
(First) (Initial) (Last)  
Address: c/o attorney Larry E. Klayman, Esq, 2020 Pennsylvania Avenue, #800  
(Street) (Apt. #)  
Washington, D.C. 20006  
(City) (State) (Zip)  
Business Phone: 310-595-0800 Home Phone: \_\_\_\_\_ Cell Phone: \_\_\_\_\_  
Email Address: leklayman@gmail.com

(NOTE: It is very important that we have your telephone number(s) and that you inform our office if you have a change of address.)

B. Attorney Complained Of:  
Name: Robert Swain Mueller  
(First) (Initial) (Last)  
Address: Office of Special Counsel, U.S. Department of Justice, 950 Pennsylvania Avenue, N.W., Suite 3266  
(Street) (Apt. #)  
Washington D.C. 20530  
(City) (State) (Zip)  
Telephone No.: \_\_\_\_\_ Attorney's Bar No., if known: \_\_\_\_\_

C. Have you filed a complaint about this matter anywhere else?  Yes  No // If yes, please give details.  
I am simultaneously filing the attached Complaint with the U.S. Department of Justice  
\_\_\_\_\_  
\_\_\_\_\_

D. Do you have a written retainer agreement with the attorney?  Yes  No // If yes, please attach a copy.  
\_\_\_\_\_  
\_\_\_\_\_

E. Where applicable, state the name of the court where the underlying case was filed, and the case name and number.  
Indictment has been threatened as certain in the U.S. District Court for the District of Columbia  
\_\_\_\_\_  
\_\_\_\_\_

F. Do you have other documents that are relevant?  Yes  No // If yes, please give details and provide copies.  
\_\_\_\_\_  
\_\_\_\_\_

**SEE REVERSE SIDE FOR REQUIRED DETAILS & SIGNATURE**

G. DETAILS OF COMPLAINT: See attached letter/complaint of Dec. 3 for the allegations  
\_\_\_\_\_





**OFFICE OF DISCIPLINARY COUNSEL**  
**THE BOARD ON PROFESSIONAL RESPONSIBILITY**  
**DISTRICT OF COLUMBIA COURT OF APPEALS**

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(Please print or type)

Date: December 3, 2018

A. Your Name: (Dr.)  
(Mr.)  
(Ms.)  
(Mrs.) Dr. Jerome R. Corsi, PhD.  
(First) (Initial) (Last)  
Address: c/o attorney Larry E. Klayman, Esq, 2020 Pennsylvania Avenue, #800  
(Street) (Apt. #)  
Washington, D.C. 20006  
(City) (State) (Zip)  
Business Phone: 310-595-0800 Home Phone: \_\_\_\_\_ Cell Phone: \_\_\_\_\_  
Email Address: leklayman@gmail.com

(NOTE: It is very important that we have your telephone number(s) and that you inform our office if you have a change of address.)

B. Attorney Complained Of:  
Name: Jeannie S. Rhee  
(First) (Initial) (Last)  
Address: Office of Special Counsel, U.S. Department of Justice, 950 Pennsylvania Avenue, N.W., Suite 3266  
(Street) (Apt. #)  
Washington D.C. 20530  
(City) (State) (Zip)  
Telephone No.: \_\_\_\_\_ Attorney's Bar No., if known: \_\_\_\_\_

C. Have you filed a complaint about this matter anywhere else?  Yes  No // If yes, please give details.  
I am simultaneously filing the attached Complaint with the U.S. Department of Justice  
\_\_\_\_\_

D. Do you have a written retainer agreement with the attorney?  Yes  No // If yes, please attach a copy.  
\_\_\_\_\_

E. Where applicable, state the name of the court where the underlying case was filed, and the case name and number.  
Indictment has been threatened as certain in the U.S. District Court for the District of Columbia  
\_\_\_\_\_

F. Do you have other documents that are relevant?  Yes  No // If yes, please give details and provide copies.  
\_\_\_\_\_  
\_\_\_\_\_

**SEE REVERSE SIDE FOR REQUIRED DETAILS & SIGNATURE**

G. DETAILS OF COMPLAINT: See attached letter/complaint of Dec. 3 for the allegations  
\_\_\_\_\_





**OFFICE OF DISCIPLINARY COUNSEL**  
**THE BOARD ON PROFESSIONAL RESPONSIBILITY**  
**DISTRICT OF COLUMBIA COURT OF APPEALS**

515 Fifth Street, N.W.  
Building A, Room 117  
Washington, D.C. 20001  
(202) 638-1501 Fax (202) 638-0862  
[www.dcattorneydiscipline.org](http://www.dcattorneydiscipline.org)

(Please print or type)

Date: December 3, 2018

A. Your Name: (Dr.)  
(Mr.)  
(Ms.)  
(Mrs.) Dr. Jerome R. Corsi, PhD.  
(First) (Initial) (Last)  
Address: c/o attorney Larry E. Klayman, Esq, 2020 Pennsylvania Avenue, #800  
(Street) (Apt. #)  
Washington, D.C. 20006  
(City) (State) (Zip)  
Business Phone: 310-595-0800 Home Phone: \_\_\_\_\_ Cell Phone: \_\_\_\_\_  
Email Address: leklayman@gmail.com

(NOTE: It is very important that we have your telephone number(s) and that you inform our office if you have a change of address.)

B. Attorney Complained Of:  
Name: Aaron S.J. Zelinsky  
(First) (Initial) (Last)  
Address: Office of Special Counsel, U.S. Department of Justice, 950 Pennsylvania Avenue, N.W., Suite 3266  
(Street) (Apt. #)  
Washington D.C. 20530  
(City) (State) (Zip)  
Telephone No.: \_\_\_\_\_ Attorney's Bar No., if known: \_\_\_\_\_

C. Have you filed a complaint about this matter anywhere else?  Yes  No // If yes, please give details.  
I am simultaneously filing the attached Complaint with the U.S. Department of Justice  
\_\_\_\_\_  
\_\_\_\_\_

D. Do you have a written retainer agreement with the attorney?  Yes  No // If yes, please attach a copy.  
\_\_\_\_\_  
\_\_\_\_\_

E. Where applicable, state the name of the court where the underlying case was filed, and the case name and number.  
Indictment has been threatened as certain in the U.S. District Court for the District of Columbia  
\_\_\_\_\_  
\_\_\_\_\_

F. Do you have other documents that are relevant?  Yes  No // If yes, please give details and provide copies.  
\_\_\_\_\_  
\_\_\_\_\_

**SEE REVERSE SIDE FOR REQUIRED DETAILS & SIGNATURE**

G. DETAILS OF COMPLAINT: See attached letter/complaint of Dec. 3 for the allegations  
\_\_\_\_\_

Lined area for text entry.

**The Undersigned hereby certifies to the Office of Disciplinary Counsel that the statements in the foregoing Complaint are true and correct to the best of my knowledge.**



SIGNATURE



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(Mrs.) Dr. Jerome R. Corsi, PhD.  
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(Street) (Apt. #)  
Washington, D.C. 20006  
(City) (State) (Zip)  
Business Phone: 310-595-0800 Home Phone: \_\_\_\_\_ Cell Phone: \_\_\_\_\_  
Email Address: leklayman@gmail.com

(NOTE: It is very important that we have your telephone number(s) and that you inform our office if you have a change of address.)

B. Attorney Complained Of:  
Name: Andrew D. Goldstein  
(First) (Initial) (Last)  
Address: Office of Special Counsel, U.S. Department of Justice, 950 Pennsylvania Avenue, N.W., Suite 3266  
(Street) (Apt. #)  
Washington D.C. 20530  
(City) (State) (Zip)  
Telephone No.: \_\_\_\_\_ Attorney's Bar No., if known: \_\_\_\_\_

C. Have you filed a complaint about this matter anywhere else?  Yes  No // If yes, please give details.  
I am simultaneously filing the attached Complaint with the U.S. Department of Justice

D. Do you have a written retainer agreement with the attorney?  Yes  No // If yes, please attach a copy.

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Indictment has been threatened as certain in the U.S. District Court for the District of Columbia

F. Do you have other documents that are relevant?  Yes  No // If yes, please give details and provide copies.

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Lined area for text entry.

**The Undersigned hereby certifies to the Office of Disciplinary Counsel that the statements in the foregoing Complaint are true and correct to the best of my knowledge.**

*June R. Carter*

SIGNATURE





**OFFICE OF DISCIPLINARY COUNSEL**  
**THE BOARD ON PROFESSIONAL RESPONSIBILITY**  
**DISTRICT OF COLUMBIA COURT OF APPEALS**

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(Please print or type)

Date: December 3, 2018

A. Your Name: (Dr.) \_\_\_\_\_  
(Mr.) \_\_\_\_\_  
(Ms.) \_\_\_\_\_  
(Mrs.) Dr. Jerome \_\_\_\_\_ R. \_\_\_\_\_ Corsi, PhD. \_\_\_\_\_  
(First) (Initial) (Last)  
Address: c/o attorney Larry E. Klayman, Esq, 2020 Pennsylvania Avenue, #800 \_\_\_\_\_  
(Street) (Apt. #)  
Washington, \_\_\_\_\_ D.C. \_\_\_\_\_ 20006 \_\_\_\_\_  
(City) (State) (Zip)  
Business Phone: 310-595-0800 Home Phone: \_\_\_\_\_ Cell Phone: \_\_\_\_\_  
Email Address: leklayman@gmail.com \_\_\_\_\_

(NOTE: It is very important that we have your telephone number(s) and that you inform our office if you have a change of address.)

B. Attorney Complained Of:  
Name: L. \_\_\_\_\_ Rush \_\_\_\_\_ Atkinson \_\_\_\_\_  
(First) (Initial) (Last)  
Address: Office of Special Counsel, U.S. Department of Justice, 950 Pennsylvania Avenue, N.W., Suite 3266 \_\_\_\_\_  
(Street) (Apt. #)  
Washington \_\_\_\_\_ D.C. \_\_\_\_\_ 20530 \_\_\_\_\_  
(City) (State) (Zip)  
Telephone No.: \_\_\_\_\_ Attorney's Bar No., if known: \_\_\_\_\_

C. Have you filed a complaint about this matter anywhere else?  Yes  No // If yes, please give details.  
I am simultaneously filing the attached Complaint with the U.S. Department of Justice  
\_\_\_\_\_  
\_\_\_\_\_

D. Do you have a written retainer agreement with the attorney?  Yes  No // If yes, please attach a copy.  
\_\_\_\_\_  
\_\_\_\_\_

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Indictment has been threatened as certain in the U.S. District Court for the District of Columbia  
\_\_\_\_\_  
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\_\_\_\_\_  
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G. DETAILS OF COMPLAINT: See attached letter/complaint of Dec. 3 for the allegations  
\_\_\_\_\_  
\_\_\_\_\_

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**The Undersigned hereby certifies to the Office of Disciplinary Counsel  
that the statements in the foregoing Complaint are true and correct to  
the best of my knowledge.**

  
SIGNATURE

# **EXHIBIT A**



Office of the Deputy Attorney General  
Washington, D.C. 20530

ORDER NO. 3915-2017

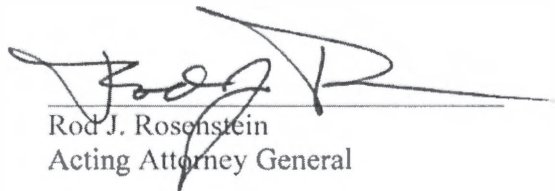
APPOINTMENT OF SPECIAL COUNSEL  
TO INVESTIGATE RUSSIAN INTERFERENCE WITH THE  
2016 PRESIDENTIAL ELECTION AND RELATED MATTERS

By virtue of the authority vested in me as Acting Attorney General, including 28 U.S.C. §§ 509, 510, and 515, in order to discharge my responsibility to provide supervision and management of the Department of Justice, and to ensure a full and thorough investigation of the Russian government's efforts to interfere in the 2016 presidential election, I hereby order as follows:

- (a) Robert S. Mueller III is appointed to serve as Special Counsel for the United States Department of Justice.
- (b) The Special Counsel is authorized to conduct the investigation confirmed by then-FBI Director James B. Comey in testimony before the House Permanent Select Committee on Intelligence on March 20, 2017, including:
  - (i) any links and/or coordination between the Russian government and individuals associated with the campaign of President Donald Trump; and
  - (ii) any matters that arose or may arise directly from the investigation; and
  - (iii) any other matters within the scope of 28 C.F.R. § 600.4(a).
- (c) If the Special Counsel believes it is necessary and appropriate, the Special Counsel is authorized to prosecute federal crimes arising from the investigation of these matters.
- (d) Sections 600.4 through 600.10 of Title 28 of the Code of Federal Regulations are applicable to the Special Counsel.

Date

5/17/17

  
Rod J. Rosenstein  
Acting Attorney General

# **EXHIBIT B**

## The New York Times

# *Assange, Avowed Foe of Clinton, Timed Email Release for Democratic Convention*

**By Charlie Savage**

July 26, 2016

WASHINGTON — Six weeks before the anti-secrecy organization WikiLeaks published an archive of hacked Democratic National Committee emails ahead of the Democratic convention, the organization’s founder, Julian Assange, foreshadowed the release — and made it clear that he hoped to harm Hillary Clinton’s chances of winning the presidency.

Mr. Assange’s remarks in a June 12 interview underscored that for all the drama of the discord that the disclosures have sown among supporters of Bernie Sanders — and of the unproven speculation that the Russian government provided the hacked data to WikiLeaks in order to help Donald J. Trump — the disclosures are also the latest chapter in the long-running tale of Mr. Assange’s battles with the Obama administration.

In the interview, Mr. Assange told a British television host, Robert Peston of the ITV network, that his organization had obtained “emails related to Hillary Clinton which are pending publication,” which he pronounced “great.” He also suggested that he not only opposed her candidacy on policy grounds, but also saw her as a personal foe.

At one point, Mr. Peston said: “Plainly, what you are saying, what you are publishing, hurts Hillary Clinton. Would you prefer Trump to be president?”

Mr. Assange replied that what Mr. Trump would do as president was “completely unpredictable.” By contrast, he thought it was predictable that Mrs. Clinton would wield power in two ways he found problematic.

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First, citing his “personal perspective,” Mr. Assange accused Mrs. Clinton of having been among those pushing to indict him after WikiLeaks disseminated a quarter of a million diplomatic cables during her tenure as secretary of state.

“We do see her as a bit of a problem for freedom of the press more generally,” Mr. Assange said.

(The cables, along with archives of military documents, were leaked by Pvt. Chelsea Manning, then known as Bradley Manning, who is serving a 35-year prison sentence. WikiLeaks also provided the documents to news outlets, including The New York Times. Despite a criminal investigation into Mr. Assange, he has not been charged; the status of that investigation is murky.)

In addition, Mr. Assange criticized Mrs. Clinton for pushing to intervene in Libya in 2011 when Col. Muammar el-Qaddafi was cracking down on Arab Spring protesters; he said that the result of the NATO air war was Libya’s collapse into anarchy, enabling the Islamic State to flourish.

“She has a long history of being a liberal war hawk, and we presume she is going to proceed” with that approach if elected president, he said.

In February, Mr. Assange said in an essay that a vote for Mrs. Clinton to become president amounted to “a vote for endless, stupid war.”

Efforts to reach Mr. Assange for comment were unsuccessful, and a Clinton campaign spokesman did not respond to an inquiry. In November 2010, when WikiLeaks and its news media partners began publishing the cables, Mrs. Clinton strongly condemned it.

“In addition to endangering particular individuals, disclosures like these tear at the fabric of the proper function of responsible government,” she said then.

Mr. Assange’s remarks last month received only scattered attention, in part because in the interview Mr. Peston appeared to mistakenly assume that WikiLeaks had obtained still-undisclosed emails from the private server Mrs. Clinton had used while secretary of state and kept cutting Mr. Assange off to ask about it.

But it now seems clearer that Mr. Assange was trying to talk about the Democratic National Committee emails.

(The confusion stemmed in part because Mr. Assange said in the interview that WikiLeaks had “published” her State Department emails. But it made a copy of the ones the department posted on its website and made them easier to search.)

Mr. Assange spoke from the Ecuadorean Embassy in London, where he has been holed up for four years. Sweden is seeking his extradition for an investigation into sexual misconduct allegations; his supporters have expressed fear that if he is arrested, he could be sent to the United States and prosecuted for publishing leaked documents.

After the Democratic chairwoman, Representative Debbie Wasserman Schultz, resigned Monday when Sanders supporters reacted angrily to revelations in the emails that party officials had privately rooted for Mrs. Clinton to win the presidential nomination, Mr. Assange told the news program “Democracy Now!” that he had timed their release to coincide with the Democratic convention.



“Often it’s the case that we have to do a lot of exploration and marketing of the material we publish ourselves to get a big political impact for it,” he said. “But in this case, we knew, because of the pending D.N.C., because of the degree of interest in the U.S. election, we didn’t need to establish partnerships with The New York Times or The Washington Post.”

Asked on that program whether the Russian government had given him the emails, Mr. Assange said that he never revealed sources but also that “no one knows who our source is.” He also said the Democratic National Committee might have been hacked on multiple occasions by different intruders.

A version of this article appears in print on July 27, 2016, on Page A17 of the New York edition with the headline: Democratic Email Release Was Timed for Convention

# **EXHIBIT C**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

JEROME CORSI,

Defendant.

Criminal No.:

Violation: 18 U.S.C. § 1001(a)(2) (False  
Statements)

**STATEMENT OF THE OFFENSE**

Pursuant to Federal Rule of Criminal Procedure 11, the United States of America and the defendant, JEROME CORSI, stipulate and agree that the following facts are true and accurate. These facts do not constitute all of the facts known to the parties concerning the charged offense; they are being submitted to demonstrate that sufficient facts exist that the defendant committed the offense to which he is pleading guilty.

1. On or about September 6, 2018, the defendant, JEROME CORSI, was interviewed voluntarily by the Special Counsel's Office, including Department of Justice prosecutors and Special Agents of the Federal Bureau of Investigation. At the time of the interview, the Special Counsel's Office was investigating the Russian government's efforts to interfere in the 2016 presidential election, including:

- a. the theft of campaign-related emails and other documents by the Russian government's Main Intelligence Directorate of the General Staff ("GRU");
- b. the GRU's provision of certain of those documents to an organization ("Organization 1") for public release in order to expand the GRU's interference in the 2016 U.S. presidential election campaign; and

- c. the nature of any connections between individuals associated with the U.S. presidential campaign of Donald J. Trump (“Trump Campaign”) and the Russian government or Organization 1.

2. CORSI was represented by counsel during the September 6, 2018 interview. At the outset of the interview, CORSI was warned that intentionally making false statements to the investigators was a violation of federal law. CORSI said that he understood.

3. During the interview, CORSI said that in the summer of 2016 an associate (“Person 1”) who CORSI understood to be in regular contact with senior members of the Trump Campaign, including with then-candidate Donald J. Trump, asked CORSI to get in touch with Organization 1 about materials it possessed relevant to the presidential campaign that had not already been released. CORSI thereafter knowingly and intentionally made the following materially false statements during the interview:

- a. CORSI said he declined the request from Person 1 and made clear to Person 1 that trying to contact Organization 1 could be subject to investigation. CORSI also stated that Person 1 never asked CORSI to have another person try to get in contact with Organization 1, and that CORSI told Person 1 that they should just wait until Organization 1 released any materials.
- b. CORSI further stated that after that initial request from Person 1, CORSI did not know what Person 1 did with respect to Organization 1, and he never provided Person 1 with any information regarding Organization 1, including what materials Organization 1 possessed or what Organization 1 might do with those materials.

4. In truth and in fact, and as CORSI well knew, after Person 1 asked CORSI to get in touch with Organization 1, CORSI did not decline the request as he stated in the interview. Instead, CORSI contacted an individual who resided in London, England (“overseas individual”) to pass on Person 1’s request to learn about materials in Organization 1’s possession that could be relevant to the presidential campaign. Corsi thereafter told Person 1 that Organization 1 possessed information that would be damaging to then-candidate Hillary Clinton and that Organization 1 planned to release damaging information in October 2016.

- a. On or about July 25, 2016, Person 1 sent an email to CORSI with the subject line, “Get to [the founder of Organization 1].” The body of the message read: “Get to [the founder of Organization 1] [a]t Ecuadorian Embassy in London and get the pending [Organization 1] emails . . . they deal with Foundation, allegedly.” On or about the same day, CORSI forwarded Person 1’s email to the overseas individual.
- b. On or about July 31, 2016, Person 1 emailed CORSI with the subject line, “Call me MON.” The body of the email read in part that the overseas individual “should see [the founder of Organization 1].”
- c. On or about August 2, 2016, CORSI responded to Person 1 by email. CORSI wrote that he was currently in Europe and planned to return in mid-August. CORSI stated: “Word is friend in embassy plans 2 more dumps. One shortly after I’m back. 2nd in Oct. Impact planned to be very damaging.... Time to let more than [the Clinton Campaign chairman] to be exposed as in bed w enemy if they are not ready to drop HRC [Hillary Rodham Clinton]. That appears to be the game hackers

are now about. Would not hurt to start suggesting HRC old, memory bad, has stroke -- neither he nor she well. I expect that much of next dump focus, setting stage for Foundation debacle.”

5. Between approximately January 13, 2017 and March 1, 2017, CORSI deleted from his computer all email correspondence that predated October 11, 2016, including Person 1’s email instructing CORSI to “get to [the founder of Organization 1]” and CORSI’s subsequent forwarding of that email to the overseas individual.

6. After the U.S. House of Representatives Permanent Select Committee on Intelligence (“HPSCI”), the U.S. Senate Select Committee on Intelligence (“SSCI”), and the Federal Bureau of Investigation (“FBI”) began inquiring in 2017 about Person 1’s connections with Organization 1, CORSI communicated with Person 1 about developments in those investigations. For example, on or about November 28, 2017, after Person 1 had identified to HPSCI a certain individual (“Person 2”) as his “source” or “intermediary” to Organization 1, Person 2 received a subpoena compelling his testimony before HPSCI, and Person 1 learned of the subpoena. On or about November 30, 2017, Person 1 asked CORSI to write publicly about Person 2. CORSI responded: “Are you sure you want to make something out of this now? Why not wait to see what [Person 2] does? You may be defending yourself too much – raising new questions that will fuel new inquiries. This may be a time to say less, not more.” Person 1 responded by telling CORSI that the other individual “will take the 5<sup>th</sup>—but let’s hold a day.”

7. Following his September 10, 2018 interview, CORSI met with the Special Counsel’s Office for several additional interviews and voluntarily provided access to his email accounts and electronic devices. CORSI made numerous claims during these interviews, including

that his representations to Person 1, beginning in August 2016, that he had a way of obtaining confidential information from Organization 1, were false.

ROBERT S. MUELLER, III  
Special Counsel

By:

\_\_\_\_\_  
Jeannie S. Rhee  
Andrew D. Goldstein  
Aaron S.J. Zelinsky  
L. Rush Atkinson, V  
The Special Counsel's Office



U.S. Department of Justice

The Special Counsel's Office

Washington, D.C. 20530

David E. Gray  
Gray Law Group  
760 Rt. 10 West, Suite 204  
Whippany, NJ 07981

Re: **Jerome Corsi**

Dear Counsel:

You have indicated that your client, Jerome Corsi (hereinafter "Client"), is interested in providing information to the government.

With respect to the meeting between the government, Client and yourself on September 21, 2018 (hereinafter "the meeting"), the government will be represented by individuals from the Office of the Special Counsel and the Federal Bureau of Investigation. The terms of this letter do not bind any office or component of the U.S. Department of Justice other than those identified in the preceding sentence. The following terms and conditions apply to the meeting:

(1) **THIS IS NOT A COOPERATION AGREEMENT.** Client has agreed to provide information to the government, and to respond to questions truthfully and completely. By receiving Client's proffer, the government does not agree to make any motion on Client's behalf or to enter into a cooperation agreement, plea agreement, immunity agreement or non-prosecution agreement with Client. The government makes no representation about the likelihood that any such agreement will be reached in connection with this meeting.

(2) Should Client be prosecuted, no statements made by Client during the meeting will be used against Client in the government's case-in-chief at trial or for purposes of sentencing, except as provided below.

(3) The government may use any statement made or information provided by Client, or on Client's behalf, in a prosecution for false statements, perjury, or obstruction of justice, premised on statements or actions during the meeting. The government may also use any such statement or information at sentencing in support of an argument that Client failed to provide truthful or complete information during the meeting, and, accordingly: (a) that under the United States Sentencing Guidelines, Client is not entitled to a downward adjustment for acceptance of responsibility pursuant to Section 3E1.1, or should receive an upward adjustment for obstruction of justice pursuant to Section 3C1.1; and (b) that Client's conduct at the meeting is a relevant

REC 9/21/18  
AZ  
AND ANY TESTIMONY BEFORE THE GRAND JURY 9/21/2018  
JRC 9/21/18



factor under 18 U.S.C. § 3553(a).

(4) The government may make derivative use of any statements made or other information provided by Client during the meeting. Therefore, the government may pursue any investigative leads obtained directly or indirectly from such statements and information and may use the evidence or information subsequently obtained therefrom against Client in any manner and in any proceeding.

(5) In any proceeding, including sentencing, the government may use Client's statements and any information provided by Client during or in connection with the meeting to cross-examine Client, to rebut any evidence or arguments offered on Client's behalf, or to address any issues or questions raised by a court on its own initiative.

(6) Neither this agreement nor the meeting constitutes a plea discussion or an attempt to initiate plea discussions. In the event this agreement or the meeting is later construed to constitute a plea discussion or an attempt to initiate plea discussions, Client knowingly and voluntarily waives any right Client might have under Fed. R. Evid. 410, Fed. R. Crim. P. 11(f), or otherwise, to prohibit the use against Client of statements made or information provided during the meeting.

(7) The government reserves the right to argue that neither this agreement nor the meeting constitutes the timely provision of complete information to the government concerning Client's involvement in an offense, within the meaning of Section 3E1.1(b) of the Sentencing Guidelines.

(8) If and when required to do so by a court, the government may disclose to the Probation Office or the court any statements and information provided by Client during the meeting.

(9) The government may disclose the fact of the meeting or the information provided by Client during the meeting to the extent the government determines in its sole discretion that disclosure would be in furtherance of its discharge of its duties and responsibilities or is otherwise required by law. Such disclosure includes disclosure to a local, state, federal, or foreign government office or agency, including but not limited to another prosecutor's office, if the recipient of the information agrees to abide by the relevant terms of this agreement.

(10) The terms and conditions set forth in this agreement extend, if applicable, to the continuation of the meeting on the dates that appear below.

(11) It is understood that this agreement is limited to the statements made by Client at the meeting and does not apply to any oral, written or recorded statements made by Client at any other time.

(12) This document embodies the entirety of the agreement between the government and Client to provide information and evidence. No other promises, agreements or understandings


exist between Client and the government regarding Client's provision of information or evidence to the government.

(13) Client and Client's attorney acknowledge that they have read, fully discussed and understand every paragraph and clause in this document and the consequences thereof.

Dated: 9/21/2018

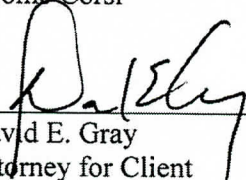
At: Washington, DC

ROBERT S. MUELLER, III  
Special Counsel

By:   
Aaron Zelinsky  
Assistant Special Counsel  
Special Counsel's Office



Jerome Corsi

  
David E. Gray  
Attorney for Client

Dates of Continuation

Initials of counsel, Client and government attorney

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

DEFENDANT'S ACCEPTANCE

The preceding statement is a summary, made for the purpose of providing the Court with a factual basis for my guilty plea to the charge against me. It does not include all of the facts known to me regarding this offense. I make this statement knowingly and voluntarily and because I am, in fact, guilty of the crime charged. No threats have been made to me nor am I under the influence of anything that could impede my ability to understand this Statement of the Offense fully.

I have read every word of this Statement of the Offense, or have had it read to me. Pursuant to Federal Rule of Criminal Procedure 11, after consulting with my attorney, I agree and stipulate to this Statement of the Offense, and declare under penalty of perjury that it is true and correct.

Date: \_\_\_\_\_

\_\_\_\_\_  
Jerome Corsi  
Defendant

ATTORNEY'S ACKNOWLEDGMENT

I have read this Statement of the Offense, and have reviewed it with my client fully. I concur in my client's desire to adopt and stipulate to this Statement of the Offense as true and accurate.

Date: \_\_\_\_\_

\_\_\_\_\_  
David E. Gray, Esq.  
Attorney for Defendant

# **EXHIBIT D**

**UNITED STATES COURT OF APPEALS FOR THE ELEVENTH CIRCUIT**  
**Appearance of Counsel Form**

Attorneys who wish to participate in an appeal must be properly admitted either to the bar of this court or for the particular proceeding pursuant to 11th Cir. R. 46-1, et seq. An attorney not yet properly admitted must file an appropriate application. In addition, all attorneys (except court-appointed counsel) who wish to participate in an appeal must file an appearance form within fourteen (14) days after notice is mailed by the clerk, or upon filing a motion or brief, whichever occurs first. Application forms and appearance forms are available on the Internet at [www.ca11.uscourts.gov](http://www.ca11.uscourts.gov).

Please Type or Print

Court of Appeals No. 15-14080

Klayman

vs.

Clinton, et al.

The Clerk will enter my appearance for these named parties: The Clinton Foundation

In this court these parties are:  appellant(s)  petitioner(s)  intervenor(s)  
 appellee(s)  respondent(s)  amicus curiae

The following related or similar cases are pending on the docket of this court:

Check here if you are lead counsel.

I hereby certify that I am an active member in good standing of the state bar or the bar of the highest court of the state (including the District of Columbia) named below, and that my license to practice law in the named state is not currently lapsed for any reason, including but not limited to retirement, placement in inactive status, failure to pay bar membership fees or failure to complete continuing education requirements. I understand that I am required to notify the clerk of this court within 14 days of any changes in the status of my state bar memberships. See 11th Cir. R. 46-7.

State Bar: District of Columbia

State Bar No.: 464127

Signature: /s/ Jeannie S. Rhee

Name (type or print): Jeannie S. Rhee

Phone: 202-663-6027

Firm/Govt. Office: WilmerHale LLP

E-mail: jeannie.rhee@wilmerhale.com

Street Address: 1875 Pennsylvania Avenue NW

Fax: 202-663-6363

City: Washington

State: D.C.

Zip: 20006

No. 15-14080

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**In the United States Court of Appeals  
for the Eleventh Circuit**

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LARRY KLAYMAN,  
PLAINTIFF-APPELLANT

v.

HILLARY RODHAM CLINTON, WILLIAM JEFFERSON CLINTON,  
AND THE CLINTON FOUNDATION, DEFENDANTS-APPELLEES

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*ON APPEAL FROM THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
(CASE NO. 15-CV-80388)  
(THE HONORABLE DONALD M. MIDDLEBROOKS, J.)*

---

**BRIEF OF APPELLEES**

---

Jamie S. Gorelick  
Jeannie S. Rhee  
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Jefferson Clinton*

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# **EXHIBIT E**



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760 Route 10 West  
Suite 204  
Whippany, NJ 07981

David E. Gray, Esq.  
dgray@graylawgroupnj.com

November 21, 2018

**VIA EMAIL**

Aaron Zalinsky, Esq.  
Office of the Special Counsel

**Re: *United States vs. Jerome Corsi, Ph.D.***

Dear Mr. Zalinsky,

As discussed, Dr. Corsi is still working out the details of the plea agreement with me and we have questions and concerns regarding several categories – 1) not reporting the plea to his broker/dealer as you suggested, 2) the factual allocution, 3) timing/potential bankruptcy filing and 4) immigrant work visa.

1. Securities License. Dr. Corsi has a securities license which he will lose as a result of this plea and various FINRA rules regarding disclosure apply to him. I know that Ms. Rhee opined that since this plea would be under seal then Dr. Corsi would not have a duty to report the conviction to his broker/dealer. However, in researching that issue, I think Dr. Corsi cannot keep this secret from his broker/dealer as the law requires him to disclose the plea to his broker/dealer. Dr. Corsi considers the recommendation that he commit a crime to be rather curious – as you represent the Department of Justice. Therefore, if the Office of the Special Counsel is requiring Dr. Corsi to refrain from stating anything to his broker/dealer unless and until the plea is unsealed, then I must ask whether your office can provide immunity to him in the event his broker/dealer, or FINRA, raises the issue of failing to report the plea agreement to the broker/dealer which is a potential violation of the law.
2. Allocution. Over the course six voluntary interviews, Dr. Corsi could not testify that he was ever in touch with Wikileaks and he could not identify any Russian collusion. He did testify that he “wanted nothing to do with Assange/Wikileaks”. While this is, in a sense true – I understand that this plea to making a false claim is predicated on the fact that Dr. Corsi had emails and phone calls wherein he was in fact interested in Wikileaks. He had not had the benefit of reviewing all of his emails prior to the interview and you graciously allowed him to review his emails and amend his statements – which he did. Now, after various amendments to his statements, Dr. Corsi is being asked to affirmatively state that he lied to FBI agents. The issue is that the statements that Dr. Corsi made were, in fact, the best he could recall at the time. From the beginning, Dr. Corsi immediately provided all of his computers, emails, phones, social media accounts, etc., and his intent was always to tell you the truth to the best of his recollection, which he admitted to you, was not very good as these events took place years ago.



3. Timing of Sentencing/Filing Bankruptcy. I understand that the sentencing would not be scheduled for some time and this plea would hang over Dr. Corsi's head until such time as he is sentenced. During this time, Dr. Corsi would not be able to engage in his livechats or other business as the plea requires his silence. Without this source of revenue and without his securities license, we are looking at a situation where Dr. Corsi may have to file for bankruptcy – which has a whole other range of difficulties with disclosure. The insistence in having an indefinite period of time between plea and sentencing puts Dr. Corsi at risk that some unanticipated event in the interim could be used to change your recommendation for no jail time. I would like to discuss these issues with you before my client can agree to proceed.
  
4. Immigration Case. Dr. Corsi is currently sponsoring his wife's cousin to come to the U.S. from Argentina on a work visa. I am looking into whether the plea must be disclosed to the immigration authorities in reference to this work visa.

Please contact me to discuss these issues.

Thank you.

Very truly yours,

DAVID E. GRAY

cc: Jerome Corsi, Ph.D.

# **EXHIBIT F**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>Criminal No.</b>
	:	
v.	:	
	:	<b>Violation:</b>
<b>JEROME CORSI,</b>	:	<b>18 U.S.C. § 1001(a)(2) (False Statements)</b>
	:	
<b>Defendant.</b>	:	

**INFORMATION**

The Special Counsel informs the Court:

**COUNT ONE**

**(False Statements)**

On September 10, 2018, defendant JEROME CORSI did willfully and knowingly make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit, the defendant falsely stated and represented to the Special Counsel’s Office, including Special Agents of the Federal Bureau of Investigation, in Washington, D.C., that he denied an associate’s request to get in touch with an organization that he understood to be in possession of stolen emails and other documents pertaining to the 2016 U.S. presidential election, that the associate never asked him to have another person try to get in touch with the organization, and that he did not provide the associate with any information about what materials the organization possessed or what it might do with those materials.

**(Title 18, United States Code, Section 1001(a)(2).)**

ROBERT S. MUELLER, III  
Special Counsel

By:

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Jeannie S. Rhee  
Andrew D. Goldstein  
Aaron S.J. Zelinsky  
L. Rush Atkinson  
The Special Counsel's Office

# **EXHIBIT G**



**U.S. Department of Justice**

*The Special Counsel's Office*

*Washington, D.C. 20530*

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November \_\_, 2018

David E. Gray, Esq.  
Gray Law Group  
760 Route 10 West, Suite 204  
Whippany, New Jersey 07981

Re: United States v. Jerome Corsi

Dear Mr. Gray:

This letter sets forth the full and complete plea offer to your client, Jerome Corsi (hereinafter referred to as “your client” or “defendant”), from the Special Counsel’s Office (hereinafter also referred to as “the Government” or “this Office”). If your client accepts the terms and conditions of this offer, please have your client execute this document in the space provided below. Upon receipt of the executed document, this letter will become the Plea Agreement (hereinafter referred to as “this Agreement”). The terms of the offer are as follows:

**1. Charges and Statutory Penalties**

Your client agrees to waive indictment and plead guilty to a Criminal Information, a copy of which is attached, charging your client with making false statements to the Special Counsel’s Office and to the Federal Bureau of Investigation, in violation of 18 U.S.C. § 1001(a)(2).

Your client understands that a violation of 18 U.S.C. § 1001 carries a maximum sentence of 5 years’ imprisonment; a fine of \$250,000, pursuant to 18 U.S.C. § 3571(b)(3); a term of supervised release of not more than 3 years, pursuant to 18 U.S.C. § 3583(b)(2); and an obligation to pay any applicable interest or penalties on fines and restitution not timely made.

In addition, your client agrees to pay a special assessment of \$100 per felony conviction to the Clerk of the United States District Court for the District of Columbia. Your client also understands that, pursuant to 18 U.S.C. § 3572 and § 5E1.2 of the United States Sentencing Commission, *Guidelines Manual* (2017) (hereinafter “Sentencing Guidelines,” “Guidelines,” or “U.S.S.G.”), the Court may also impose a fine that is sufficient to pay the federal government the costs of any imprisonment, term of supervised release, and period of probation.

**2. Plea**

Your client understands and acknowledges that this Agreement and any plea of guilty which your client may enter pursuant to this Agreement are contingent upon the entry of a guilty plea by the defendant in this case. If your client fails to enter a guilty plea, this Agreement and

any proceedings pursuant to this Agreement may be withdrawn or voided in whole or in part at the option of this Office.

**3. Factual Stipulations**

Your client agrees that the attached “Statement of the Offense” fairly and accurately describes your client’s actions and involvement in the offense to which your client is pleading guilty. Please have your client sign and return the Statement of the Offense as a written proffer of evidence, along with this Agreement.

**4. Additional Charges**

In consideration of your client’s guilty plea to the above offense, your client will not be further prosecuted criminally by this Office for the conduct set forth in the attached Statement of the Offense; for any other false statements made by him to this Office or to the grand jury between September 6, 2018 and November 2, 2018; and for obstructing, aiding or abetting in the obstruction of, or conspiring to obstruct or commit perjury before congressional or grand jury investigations in connection with the conduct described in the Statement of Offense.

**5. Sentencing Guidelines Analysis**

Your client understands that the sentence in this case will be determined by the Court, pursuant to the factors set forth in 18 U.S.C. § 3553(a), including a consideration of the applicable guidelines and policies set forth in the Sentencing Guidelines. Pursuant to Federal Rule of Criminal Procedure 11(c)(1)(B), and to assist the Court in determining the appropriate sentence, the parties agree to the following:

**A. Estimated Offense Level Under the Guidelines**

The parties agree that the following Sentencing Guidelines sections apply:

U.S.S.G. §2B1.1(a)(2)	Base Offense Level:	6
	Total:	6

**B. Acceptance of Responsibility**

The Government agrees that a 2-level reduction will be appropriate, pursuant to U.S.S.G. § 3E1.1, provided that your client clearly demonstrates acceptance of responsibility, to the satisfaction of the Government, through your client’s allocution, adherence to every provision of this Agreement, and conduct between entry of the plea and imposition of sentence.

Nothing in this Agreement limits the right of the Government to seek denial of the adjustment for acceptance of responsibility, pursuant to U.S.S.G. § 3E1.1, and/or imposition of an adjustment for obstruction of justice, pursuant to U.S.S.G. § 3C1.1, regardless of any agreement set forth above, should your client move to withdraw your client’s guilty plea after it

is entered, or should it be determined by the Government that your client has either (a) engaged in conduct, unknown to the Government at the time of the signing of this Agreement, that constitutes obstruction of justice, (b) engaged in additional criminal conduct after signing this Agreement, or (c) taken any other action inconsistent with acceptance of responsibility.

In accordance with the above, the applicable Guidelines Offense Level will be at least **4**.

**C. Estimated Criminal History Category**

Based upon the information now available to this Office, your client has no criminal convictions.

Accordingly, your client is estimated to have zero criminal history points and your client's Criminal History Category is estimated to be I. Your client acknowledges that if additional convictions are discovered during the pre-sentence investigation by the United States Probation Office, your client's criminal history points may increase.

**D. Estimated Applicable Guidelines Range**

Based upon the agreed total offense level and the estimated criminal history category set forth above, your client's estimated Sentencing Guidelines range is zero months to six months' imprisonment (the "Estimated Guidelines Range"). In addition, the parties agree that, pursuant to U.S.S.G. § 5E1.2, should the Court impose a fine, at Guidelines level 4, the estimated applicable fine range is \$500 to \$9,500. Your client reserves the right to ask the Court not to impose any applicable fine.

The parties agree that, solely for the purposes of calculating the applicable range under the Sentencing Guidelines, neither a downward nor upward departure from the Estimated Guidelines Range set forth above is warranted. Accordingly, neither party will seek any departure or adjustment to the Estimated Guidelines Range, nor will either party suggest that the Court consider such a departure or adjustment, except as provided above. Moreover, your client understands and acknowledges that the Estimated Guidelines Range agreed to by the parties is not binding on the Probation Office or the Court. Should the Court determine that a different guidelines range is applicable, your client will not be permitted to withdraw your client's guilty plea on that basis, and the Government and your client will still be bound by this Agreement.

Your client understands and acknowledges that the terms of this section apply only to conduct that occurred before the execution of this Agreement. Should your client commit any conduct after the execution of this Agreement that would form the basis for an increase in your client's base offense level or justify an upward departure (examples of which include, but are not limited to, obstruction of justice, failure to appear for a court proceeding, criminal conduct while pending sentencing, and false statements to law enforcement agents, the probation officer, or the Court), the Government is free under this Agreement to seek an increase in the base offense level based on that post-agreement conduct.

**6. Agreement as to Sentencing Allocution**



Based upon the information known to the Government at the time of the signing of this Agreement, the parties further agree that a sentence within the Estimated Guidelines Range would constitute a reasonable sentence in light of all of the factors set forth in 18 U.S.C. § 3553(a), should such a sentence be subject to appellate review notwithstanding the appeal waiver provided below.

Provided the defendant clearly demonstrates acceptance of responsibility, to the satisfaction of the Government, as set forth above, the Government will seek a sentence within the Estimated Guidelines Range and will not oppose your client's request for a sentence of probation.

**7. Reservation of Allocution**

The Government and your client reserve the right to describe fully, both orally and in writing, to the sentencing judge, the nature and seriousness of your client's misconduct, including any misconduct not described in the charges to which your client is pleading guilty.

The Government agrees to bring to the Court's attention at sentencing the defendant's efforts to cooperate with the Government, on the condition that your client continues to respond and provide information regarding any and all matters as to which the Government deems relevant. Your client also agrees that the sentencing in this case may be delayed until the Government's ongoing investigation has been completed, as determined by the Government, so that the Court will have the benefit of all relevant information before a sentence is imposed.

The parties also reserve the right to inform the presentence report writer and the Court of any relevant facts, to dispute any factual inaccuracies in the presentence report, and to contest any matters not provided for in this Agreement. In the event that the Court considers any Sentencing Guidelines adjustments, departures, or calculations different from any agreements contained in this Agreement, or contemplates a sentence outside the Guidelines range based upon the general sentencing factors listed in 18 U.S.C. § 3553(a), the parties reserve the right to answer any related inquiries from the Court. In addition, if in this Agreement the parties have agreed to recommend or refrain from recommending to the Court a particular resolution of any sentencing issue, the parties reserve the right to full allocution in any post-sentence litigation. The parties retain the full right of allocution in connection with any post-sentence motion which may be filed in this matter and/or any proceeding(s) before the Bureau of Prisons. In addition, your client acknowledges that the Government is not obligated and does not intend to file any post-sentence downward departure motion in this case pursuant to Rule 35(b) of the Federal Rules of Criminal Procedure.

**8. Court Not Bound by this Agreement or the Sentencing Guidelines**

Your client understands that the sentence in this case will be imposed in accordance with 18 U.S.C. § 3553(a), upon consideration of the Sentencing Guidelines. Your client further understands that the sentence to be imposed is a matter solely within the discretion of the Court. Your client acknowledges that the Court is not obligated to follow any recommendation of the

Government at the time of sentencing. Your client understands that neither the Government's recommendation nor the Sentencing Guidelines are binding on the Court.

Your client acknowledges that your client's entry of a guilty plea to the charged offense authorizes the Court to impose any sentence, up to and including the statutory maximum sentence, which may be greater than the applicable Guidelines range. The Government cannot, and does not, make any promise or representation as to what sentence your client will receive. Moreover, it is understood that your client will have no right to withdraw your client's plea of guilty should the Court impose a sentence that is outside the Guidelines range or if the Court does not follow the Government's sentencing recommendation. The Government and your client will be bound by this Agreement, regardless of the sentence imposed by the Court. Any effort by your client to withdraw the guilty plea because of the length of the sentence shall constitute a breach of this Agreement.

**9. Waivers**

**A. Venue**

Your client waives any challenge to venue in the District of Columbia.

**B. Statute of Limitations**

Your client agrees that, should the conviction following your client's plea of guilty pursuant to this Agreement be vacated for any reason, any prosecution, based on the conduct set forth in the attached Statement of the Offense, that is not time-barred by the applicable statute of limitations on the date of the signing of this Agreement (including any counts that the Government has agreed not to prosecute or to dismiss at sentencing pursuant to this Agreement) may be commenced or reinstated against your client, notwithstanding the expiration of the statute of limitations between the signing of this Agreement and the commencement or reinstatement of such prosecution. It is the intent of this Agreement to waive all defenses based on the statute of limitations with respect to any prosecution of conduct set forth in the attached Statement of the Offense that is not time-barred on the date that this Agreement is signed.

**C. Trial Rights**

Your client understands that by pleading guilty in this case your client agrees to waive certain rights afforded by the Constitution of the United States and/or by statute or rule. Your client agrees to forego the right to any further discovery or disclosures of information not already provided at the time of the entry of your client's guilty plea. Your client also agrees to waive, among other rights, the right to be indicted by a Grand Jury, the right to plead not guilty, and the right to a jury trial. If there were a jury trial, your client would have the right to be represented by counsel, to confront and cross-examine witnesses against your client, to challenge the admissibility of evidence offered against your client, to compel witnesses to appear for the purpose of testifying and presenting other evidence on your client's behalf, and to choose whether to testify. If there were a jury trial and your client chose not to testify at that trial, your client would have the right to have the jury instructed that your client's failure to testify could

not be held against your client. Your client would further have the right to have the jury instructed that your client is presumed innocent until proven guilty, and that the burden would be on the United States to prove your client's guilt beyond a reasonable doubt. If your client were found guilty after a trial, your client would have the right to appeal your client's conviction. Your client understands that the Fifth Amendment to the Constitution of the United States protects your client from the use of self-incriminating statements in a criminal prosecution. By entering a plea of guilty, your client knowingly and voluntarily waives or gives up your client's right against self-incrimination.

Your client acknowledges discussing with you Rule 11(f) of the Federal Rules of Criminal Procedure and Rule 410 of the Federal Rules of Evidence, which ordinarily limit the admissibility of statements made by a defendant in the course of plea discussions or plea proceedings if a guilty plea is later withdrawn. Your client knowingly and voluntarily waives the rights that arise under these rules in the event your client withdraws your client's guilty plea or withdraws from this Agreement after signing it.

Your client also agrees to waive all constitutional and statutory rights to a speedy sentence and agrees that the plea of guilty pursuant to this Agreement will be entered at a time decided upon by the parties with the concurrence of the Court. Your client understands that the date for sentencing will be set by the Court.

#### **D. Appeal Rights**

Your client understands that federal law, specifically 18 U.S.C. § 3742, affords defendants the right to appeal their sentences in certain circumstances. Your client agrees to waive the right to appeal the sentence in this case, including but not limited to any term of imprisonment, fine, forfeiture, award of restitution, term or condition of supervised release, authority of the Court to set conditions of release, and the manner in which the sentence was determined, except to the extent the Court sentences your client above the statutory maximum or guidelines range determined by the Court or your client claims that your client received ineffective assistance of counsel, in which case your client would have the right to appeal the illegal sentence or above-guidelines sentence or raise on appeal a claim of ineffective assistance of counsel, but not to raise on appeal other issues regarding the sentencing. In agreeing to this waiver, your client is aware that your client's sentence has yet to be determined by the Court. Realizing the uncertainty in estimating what sentence the Court ultimately will impose, your client knowingly and willingly waives your client's right to appeal the sentence, to the extent noted above, in exchange for the concessions made by the Government in this Agreement.

#### **E. Collateral Attack**

Your client also waives any right to challenge the conviction entered or sentence imposed under this Agreement or otherwise attempt to modify or change the sentence or the manner in which it was determined in any collateral attack, including, but not limited to, a motion brought under 28 U.S.C. § 2255 or Federal Rule of Civil Procedure 60(b), except to the extent such a motion is based on newly discovered evidence or on a claim that your client received ineffective

assistance of counsel. Your client reserves the right to file a motion brought under 18 U.S.C. § 3582(c)(2), but agrees to waive the right to appeal the denial of such a motion.

#### **F. Privacy Act and FOIA Rights**

Your client also agrees to waive all rights, whether asserted directly or by a representative, to request or receive from any department or agency of the United States any records pertaining to the investigation or prosecution of this case, including and without limitation any records that may be sought under the Freedom of Information Act, 5 U.S.C. § 552, or the Privacy Act, 5 U.S.C. § 552a, for the duration of the Office's investigation.

#### **10. Restitution**

Your client understands that the Court has an obligation to determine whether, and in what amount, mandatory restitution applies in this case under 18 U.S.C. § 3663A. The Government and your client agree that mandatory restitution does not apply in this case.

#### **11. Breach of Agreement**

Your client understands and agrees that, if after entering this Agreement, your client fails specifically to perform or to fulfill completely each and every one of your client's obligations under this Agreement, or engages in any criminal activity prior to sentencing, your client will have breached this Agreement. In the event of such a breach: (a) the Government will be free from its obligations under this Agreement; (b) your client will not have the right to withdraw the guilty plea; (c) your client will be fully subject to criminal prosecution for any other crimes, including perjury and obstruction of justice; and (d) the Government will be free to use against your client, directly and indirectly, in any criminal or civil proceeding, all statements made by your client and any of the information or materials provided by your client, including such statements, information and materials provided pursuant to this Agreement or during the course of any debriefings conducted in anticipation of, or after entry of, this Agreement, whether or not the debriefings were previously characterized as "off-the-record" debriefings, and including your client's statements made during proceedings before the Court pursuant to Rule 11 of the Federal Rules of Criminal Procedure.

Your client understands and agrees that the Government shall be required to prove a breach of this Agreement only by a preponderance of the evidence, except where such breach is based on a violation of federal, state, or local criminal law, which the Government need prove only by probable cause in order to establish a breach of this Agreement.

Nothing in this Agreement shall be construed to permit your client to commit perjury, to make false statements or declarations, to obstruct justice, or to protect your client from prosecution for any crimes not included within this Agreement or committed by your client after the execution of this Agreement. Your client understands and agrees that the Government reserves the right to prosecute your client for any such offenses. Your client further understands that any perjury, false statements or declarations, or obstruction of justice relating to your client's

obligations under this Agreement shall constitute a breach of this Agreement. In the event of such a breach, your client will not be allowed to withdraw your client's guilty plea.

**12. Complete Agreement**

Other than a proffer agreement dated September 21, 2018 and continued on October 31, November 1, and November 2, 2018, no agreements, promises, understandings, or representations have been made by the parties or their counsel other than those contained in writing herein, nor will any such agreements, promises, understandings, or representations be made unless committed to writing and signed by your client, defense counsel, and the Office. The proffer agreement is superseded as noticed herein if the Agreement is breached.

Your client further understands that this Agreement is binding only upon the Office. This Agreement does not bind any other United States Attorney's Office, nor does it bind any other state, local, or federal prosecutor. It also does not bar or compromise any civil, tax, or administrative claim pending or that may be made against your client.

If the foregoing terms and conditions are satisfactory, your client may so indicate by signing this Agreement and the Statement of the Offense, and returning both to me no later than November \_\_, 2018.

Sincerely yours,

ROBERT S. MUELLER, III  
Special Counsel

By: \_\_\_\_\_

Jeannie S. Rhee  
Andrew D. Goldstein  
Aaron S.J. Zelinsky  
L. Rush Atkinson, V  
The Special Counsel's Office

DEFENDANT'S ACCEPTANCE

I have read every page of this Agreement and have discussed it with my attorney, David E. Gray. I fully understand this Agreement and agree to it without reservation. I do this voluntarily and of my own free will, intending to be legally bound. No threats have been made to me nor am I under the influence of anything that could impede my ability to understand this Agreement fully. I am pleading guilty because I am in fact guilty of the offense identified in this Agreement.

I reaffirm that absolutely no promises, agreements, understandings, or conditions have been made or entered into in connection with my decision to plead guilty except those set forth in this Agreement. I am satisfied with the legal services provided by my attorney in connection with this Agreement and matters related to it.

Date: \_\_\_\_\_

\_\_\_\_\_  
Jerome Corsi  
Defendant

ATTORNEY'S ACKNOWLEDGMENT

I have read every page of this Agreement, reviewed this Agreement with my client, Jerome Corsi, and fully discussed the provisions of this Agreement with my client. These pages accurately and completely set forth the entire Agreement. I concur in my client's desire to plead guilty as set forth in this Agreement.

Date: \_\_\_\_\_

\_\_\_\_\_  
David E. Gray, Esq.  
Attorney for Defendant