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January 17, 2020

Jeffrey R. Ragsdale
Acting Director
Office of Professional Responsibility
U.S. Department of Justice
Suite 3266
950 Pennsylvania Avenue N.W.
Washington, DC 20530

Cynthia K. Shaw
Director
Departmental Ethics Office
U.S. Department of Justice
950 Pennsylvania Avenue N.W.
Washington, DC 20530

Dear Acting Director Ragsdale and Director Shaw:

Democracy 21 is filing this complaint to request that the Office of Professional Responsibility and the Departmental Ethics Office investigate and take appropriate action regarding the failure by Attorney General William P. Barr to comply with Department of Justice Department norms, standards of conduct and regulations.

It is your responsibility to the Justice Department and the American people to hold DOJ officials, from staff attorneys to the Attorney General himself, accountable for failing to comply with Justice Department norms, standards and rules. Democracy 21 strongly urges you to carry out this responsibility by holding the Attorney General accountable for failing to operate within the boundaries of acceptable conduct for a Justice Department official.

The improper actions by Attorney General Barr cover a wide range of his statements and activities but all result from a single overriding impropriety: the Attorney General has eschewed the core mission of the Department of Justice “to ensure fair and impartial administration of justice for all Americans.”¹

Attorney General Barr has instead repeatedly demonstrated bias in acting to protect the personal and political interests of President Trump, as opposed to protecting the interests of the American people. He has done this to the detriment of the country and in derogation of the mission and integrity of the Department he heads.

As we discuss below, Attorney General Barr has directly contradicted, misrepresented or undermined the independent, non-partisan and credible work of both the Department’s Inspector General and its Special Counsel, in order to blunt conclusions by these officials which were contrary to the views and interests of President Trump. He has publicly echoed the President’s

¹ <https://www.justice.gov/jmd/organization-mission-and-functions-manual-overview>

inflammatory rhetoric about “spying” and “collusion” without providing any adequate legal basis for using these terms. And he has refused to recuse himself from sensitive Department decisions about the handling of a whistleblower complaint alleging a gross abuse of power by President Trump and in which the Attorney General himself is directly and personally implicated.

We enclose for your information a letter sent by the New York City Bar Association to the Republican and Democratic leaders of the House and Senate which expresses “serious concerns about the propriety of Barr’s recent actions and statements.” The letter urges Congress “to commence formal inquiries into a pattern of conduct by Attorney General William P. Barr that threatens public confidence in the fair and impartial administration of justice.”

As a member of the President’s Cabinet and of his Administration, the Attorney General has the job of implementing the President’s policy goals. But the Attorney General, uniquely among Cabinet officers, also has the overriding obligation to serve the interests of “fair and impartial justice for all Americans,” and to ensure—as the nation’s chief law enforcement official—that the administration of justice is not subordinated to the President’s personal or political interests.

It is the clear duty of the Attorney General always to maintain fidelity to the Constitution and to the nation’s legal system, and never to abdicate these responsibilities to protect the President’s personal or political interests at the expense of the impartial administration of justice.

Attorney General Barr has repeatedly failed meet this critical obligation to the American people. Therefore, as the Justice Department officials who have the responsibility to safeguard the norms, standards and rules that protect the Department’s integrity and credibility, it falls to you to investigate and take appropriate remedial action to address the Attorney General’s improper conduct.

i.

Since taking office, President Trump has loudly and repeatedly attacked the Justice Department and the FBI, proclaiming that they improperly and illegally initiated and conducted an investigation into whether the 2016 Trump campaign coordinated or conspired with agents of Russia who interfered with the 2016 presidential election. Trump has claimed that FBI and Justice Department officials initiated the investigation without an evidentiary basis to do so and that they conducted the investigation with political bias against him.

The New York Times has characterized Trump’s views as “his long obsession with the origins of the Russia inquiry.”²

The investigation of the Trump campaign and its relationship with Russia was initially opened by the FBI in July 2016, shortly before the 2016 Republican nominating convention. Ultimately, in May 2017, former Deputy Attorney General Rod Rosenstein appointed former

² K. Benner and Adam Goldman, “Justice Dept. Is Said to Open Criminal Inquiry Into Its Own Russia Investigation,” *The New York Times* (Oct. 24, 2019).

FBI Director Robert Mueller as Special Counsel to conduct the investigation. Mueller released a full report on the findings of his investigation in July 2019.

In March 2018, well before the Mueller investigation was completed, Inspector General Michael Horowitz announced that in response to requests from Attorney General Sessions and Members of Congress, he was undertaking an independent investigation into the origins and conduct of the Department's investigation of the 2016 Trump campaign in order to determine, among other matters, whether the investigation was begun in compliance with Departmental rules and standards, and whether there was any evidence of bias or impropriety in how the investigation was conducted.

In May 2019, four months after he became Attorney General, and notwithstanding the fact that the Inspector General's independent investigation had been underway for well over a year, Attorney General Barr announced his own separate investigation into the same matter: the origins of the Department's 2016 investigation.³ He appointed John Durham, the U.S. Attorney for Connecticut, to head this investigation, which, unlike the Inspector General's investigation, was under Barr's direct control and supervision. In October 2019, press reports stated that the Durham investigation shifted from "an administrative review of the Russia investigation overseen by Attorney General William P. Barr to a criminal inquiry. . . ."⁴ As this press report noted, "The move also creates an unusual situation in which the Justice Department is conducting a criminal investigation into itself." *Id.*

On December 9, 2019, Inspector General Horowitz released his long-anticipated report.⁵ In that report, the Inspector General found that the Department did have sufficient basis to initiate the 2016 investigation and that FBI and Department officials had acted without political bias in conducting the investigation.

The report also found that the FBI committed numerous errors in its dealings with the FISA court to seek and renew wiretap warrants related to the investigation.⁶ But with regard to the opening of the investigation, the Inspector General specifically found that "under the AG Guidelines and the [FBI Guidelines], the FBI had an authorized purpose when it opened Crossfire Hurricane to obtain information about, or protect against, a national security threat or federal crime, even though the investigation also had the potential to impact constitutionally protected activity." IG Rpt. at iii.

³ A. Goldman, C. Savage, M. Schmidt, "Barr Assigns U.S. Attorney in Connecticut to Review Origins of Russia Inquiry," *The New York Times* (May 13, 2019).

⁴ K. Benner and Adam Goldman, "Justice Dept. Is Said to Open Criminal Inquiry Into Its Own Russia Investigation," *The New York Times* (Oct. 24, 2019).

⁵ DOJ Office of the Inspector General, "Review of Four FISA Applications and Other Aspects of the FBI's Crossfire Hurricane Investigation," Oversight and Review Division 20-012 (December 2019 (Revised)) (<https://oig.justice.gov/reports/2019/o20012.pdf>)

⁶ C. Savage, A. Goldman and K. Benner, "Report on F.B.I. Russia Inquiry Finds Serious Errors but Debunks Anti-Trump Plot," *The New York Times* (Dec. 9, 2019).

Attorney General Barr immediately attacked the Inspector General's report. In an extraordinary statement released the same day as the Inspector General report, the Attorney General criticized and challenged the Inspector General's conclusion that there was an adequate basis to open the 2016 investigation. Directly contradicting the specific finding made by the Inspector General, Attorney General Barr said that "the FBI launched an intrusive investigation of a U.S. presidential campaign on the thinnest of suspicions that, in my view, were insufficient to justify the steps taken." (Emphasis added).⁷

In a separate statement released the same day, U.S. Attorney Durham followed suit and publicly challenged the Inspector General report, stating that he "advised the Inspector General that we do not agree with some of the report's conclusions as to predication and how the FBI case was opened."⁸

The very next day, Barr doubled down on his criticisms of the Inspector General:

Mr. Barr said for a second straight day that he disagreed with the findings in the long-awaited report by the inspector general, Michael E. Horowitz, that the F.B.I. lawfully opened its inquiry. And he went further, saying that Obama administration officials had spied on the president's associates and, in the process, jeopardized civil liberties.

"The greatest danger to our free system is that the incumbent government use the apparatus of the state, principally the law enforcement and intelligence agencies, both to spy on political opponents but also to use them in a way that could affect the outcome of an election," Mr. Barr said in an interview with NBC News.⁹

While it is not unusual for the head of an agency to issue a statement publicly disagreeing with findings by an Inspector General that are critical of the agency, it is very rare for an agency head to disagree with an Inspector General's conclusion that exonerates the agency of wrongdoing. Here, however, Attorney General Barr rejected the Inspector General's conclusion exonerating the Justice Department in finding that there was an "authorized purpose" in initiating the 2016 investigation. Barr, instead, issued statements critical of the Department he heads, echoing the attacks on the Justice Department made by President Trump but disproven by the Inspector General.

Most importantly, DOJ rules prohibit Department officials from publicly commenting on open criminal investigations. These rules state that Department personnel may not "confirm the

⁷ <https://www.justice.gov/opa/pr/statement-attorney-general-william-p-barr-inspector-generals-report-review-four-fisa>

⁸ <https://www.justice.gov/usao-ct/pr/statement-us-attorney-john-h-durham>

⁹ K. Benner and E. Sullivan, "Trump and Barr Escalate Attacks on F.B.I. Over Report on Russia Inquiry," *The New York Times* (Dec. 10, 2019).

existence of or otherwise comment about ongoing investigations” and may not comment on “the nature or progress” of an “ongoing investigation.” USAM § 1-7.400 (April 2018).

In general, this provision forbids Department officials, including the Attorney General, from engaging in any discussion about active criminal investigations, except in limited, specific circumstances that are not applicable here.

The statements issued by both Attorney General Barr and U.S. Attorney Durham disagreeing with the key conclusions of the Inspector General report were clearly based on their views about the findings of the parallel criminal investigation they are conducting into the same matter that was investigated by the Inspector General. Thus, Attorney General Barr and U.S. Attorney Durham chose to discuss an ongoing criminal investigation in order to attack the findings of the Inspector General and thereby improperly provided cover for President Trump’s obsessive attacks on the 2016 Russia/Trump investigation opened by the Justice Department and the FBI.

Democracy 21 believes these statements were in violation of DOJ rules prohibiting Department officials from commenting on open criminal investigations.

There was no legitimate reason for them to make these statements about the Inspector General report. The only plausible explanation for their comments is that Barr and Durham wanted to publicly undermine the Inspector General report on the day of its release and thereby to blunt the public impact of its findings. They apparently did so because the Inspector General’s key finding that the 2016 investigation was initiated in conformance with Departmental guidelines is contrary to the repeated attacks on the investigation that have been made by President Trump.

Attorney General Barr’s improper statements challenging the Inspector General report served only the interests of President Trump, who has relentlessly attacked the Justice Department for improperly undertaking the 2016 investigation. President Trump’s attacks were validated by Barr’s criticism of the Inspector General’s report.

Barr’s statements did not serve the interests of the Department of Justice, whose officials were vindicated by the report’s conclusions with regard to the origins of the 2016 investigation. Nor did Barr’s statements further the interests of the American people, who were well served by having the Inspector General conduct a thorough, independent and non-partisan review of this controversial question.

By publicly attacking the Inspector General report immediately upon its issuance, by specifically disagreeing with its central conclusion, and by having U.S. Attorney Durham follow with his challenge to the report, Attorney General Barr undermined his own Inspector General and attacked his own Department. Barr demonstrated his bias and fealty to President Trump, contravening the Department’s mission of promoting “fair and impartial justice for all Americans,” in favor of echoing President Trump’s irresponsible attacks on the Justice Department itself.

Attorney General Barr's attack on the Inspector General report is just the latest example of an ongoing pattern of bias elevating the personal and political interests of President Trump over the interests of the Department of Justice and the American people. This has been a pattern for Barr since he became Attorney General.

A. Barr demonstrated bias and violated Justice Department norms and standards of conduct by publicly testifying in Congress that FBI and Justice Department officials engaged in "spying" on the Trump campaign during the 2016 presidential election. Barr did so without providing a scintilla of evidence to back up his explosive allegation. These statements by Attorney General Barr could only be understood as an attack on the integrity and credibility of Justice Department and FBI officials.

On April 15, 2019, Democracy 21 filed a complaint with the DOJ Office of Professional Responsibility, stating that it was improper for the Attorney General to charge that "spying" has occurred by the FBI and Justice Department when he had no evidence to back up his claim. Indeed, in response to a question about whether he had evidence to substantiate his claim, Barr said, "I have no specific evidence that I would cite right now. I do have questions about it."¹⁰

The remarks of the Attorney General and his explosive allegation that "spying" occurred did not take place in a vacuum. Instead, they were made in the context of a heated political attack by President Trump and his allies on the lawfulness of the Special Counsel investigation into whether a hostile foreign power illegally interfered in the 2016 presidential election to benefit the Trump campaign, and whether it did so in coordination with members of the Trump campaign.

Attorney General Barr knew or certainly should have known that his unsubstantiated allegation would be publicly used by President Trump to validate his unsubstantiated claim that illegal "spying" on his campaign had occurred, and that the whole investigation by Special Counsel Robert Mueller was tainted as a result. Thus, the Attorney General wittingly and improperly made himself part of the President's effort to discredit the Special Counsel's investigation. He used the office of the Attorney General to participate on behalf of President Trump in a political battle attacking the very Department he leads.

B. On May 7, 2019, Democracy 21 filed an additional complaint with the DOJ Office of Professional Responsibility alleging that Attorney General Barr was required to be recused from any involvement in the 14 active Justice Department matters stemming from the Special Counsel investigation that were referred to the Department by the Special Counsel. To our knowledge, the recusal never occurred.

The recusal was necessary because of Barr's demonstrated bias in his handling of the report issued by Special Counsel Mueller, and his effort to "spin" the release of the report in order to diminish any criticism of President Trump. Barr's actions and statements relating to the Mueller report collectively demonstrated a pattern of bias in favor of President Trump that

¹⁰ D. Barrett and K. Demirjian, "Attorney general says he believes 'spying did occur' in probe of Trump campaign associates," *The Washington Post* (April 10, 2019).

created the clear public impression he was serving as President Trump's defense counsel rather than as the Nation's chief attorney.

First, upon receiving the final report from the Special Counsel and before it was released to the public, Barr sent a four-page letter to Congress on March 24, 2019, mischaracterizing the Mueller report.¹¹ Barr then left his mischaracterization as the only information available to Congress and to the public for almost a month before he finally released the report to Congress and the public.

Barr's March 24 letter allowed President Trump to claim, without contradiction, that the Mueller report exonerated him on charges of collusion and obstruction of justice.

In fact, the report did no such thing. The report did not deal with collusion at all, but only with the legal issues of conspiracy and coordination. The report also explicitly stated that it did not exonerate President Trump on obstruction of justice.

Indeed, far from exonerating Trump on obstruction of justice, the report indicated that the Special Counsel did not seek an indictment on obstruction of justice because of a Justice Department policy, which the Special Counsel was obligated to follow, that prohibited indictment of a sitting president. In fact, the Mueller report "found 10 instances where President Donald Trump's conduct raised issues of possible obstruction of justice."¹²

The Special Counsel himself objected to Barr's inaccurate description of the Special Counsel report. Mueller sent a letter to Barr on March 27, three days after his March 24 letter to Congress, protesting Barr's characterization of the report and urging him to release the summaries contained in the Mueller report itself.¹³ Mueller said that releasing the summaries at that time "would alleviate the misunderstandings that have arisen and would answer congressional and public questions about the nature and outcome of our investigation."

Barr refused Mueller's request to release the summaries in the report. This left in place Barr's mischaracterization of the report, which allowed President Trump to continue to make the false public claim that he had been totally exonerated by the report. Barr never corrected the President's claim, even though he knew that the President was using his March 24 letter as the basis for making false public claims about the Mueller report.

Barr compounded his "spinning" of the Special Counsel report on April 18, 2019, hours before the public release of the redacted report, by holding a lengthy press conference in which he continued to mischaracterize the Mueller report. Once again, Barr inaccurately presented the

¹¹ M. Zapotosky and D. Barrett, "Mueller did not find the Trump campaign conspired with Russia, attorney general says," *The Washington Post* (March 24, 2019).

¹² POLITICO staff, "10 episodes where Trump might have obstructed justice," *POLITICO*, (April 4, 2019)

¹³ D. Barrett and M. Zapotosky, "Mueller complained that Barr's letter did not capture 'context' of Trump probe," *The Washington Post* (April 30, 2019).

report to the media and the public in a biased manner that served to support President Trump's false claims about the Mueller report, at the expense of what the report actually said.

In the April 18 press conference, Barr agreed with and repeated the President's "no collusion" refrain a number of times in saying that the report found there was "no collusion" between the Trump campaign and Russia. Barr knew, however, that the report explicitly said it was not addressing the question of "collusion." By using Trump's invented framing of the investigation as a question of "collusion," Barr knowingly mischaracterized the Mueller report, while validating Trump's repeated claims of "no collusion."

Collectively, Barr's actions and statements with regard to the Special Counsel report demonstrated his bias and his willingness to use the office of Attorney General to defend and publicly amplify the false positions taken by President Trump. Barr did this at the expense and credibility of the Mueller investigation and to the detriment of the American people's right to "fair and impartial justice."

C. On October 1, 2019, Democracy 21 filed a complaint with the DOJ Inspector General, calling for an investigation of Barr's handling of the Ukraine whistleblower complaint. This was yet another egregious example of how Barr used his office to protect the personal and political interests of President Trump in contrast to the interests of the Department and the American people, in a matter that eventually led to the impeachment of President Trump by the House of Representatives.

As the House has found, President Trump withheld military assistance to Ukraine authorized by Congress in order to pressure Ukraine to investigate a political opponent of Trump and thereby to illegally intervene in the 2020 presidential election. (The GAO recently found that President Trump broke the law in withholding these funds.¹⁴)

In a July 25, 2019 call with Ukraine President Zelensky, President Trump specifically mentioned Attorney General Barr five times as the person, along with Trump's personal attorney Rudy Giuliani, who would follow up with Zelensky in Trump's attempt to have Ukraine investigate and provide derogatory information about former Vice President Joe Biden.¹⁵ According to the White House transcript of the call, Trump said (emphases added):

"I would like to have *the Attorney General* call you or your people and I would like you to get to the bottom of it."

"I will ask him [Giuliani] to call you along with *the Attorney General*."

¹⁴ E. Cochrane, E. Lipton, and C. Cameron, "GAO Report Says Trump Administration Broke Law in Withholding Ukraine Aid," *The New York Times* (January 16, 2020).

¹⁵ D. Barrett, M. Zapotosky, C. Leonnig and S. Harris, "Trump offered Ukrainian president Justice Dept. help in an investigation of Biden, memo shows," *The Washington Post* (Sept. 26, 2020).

“There’s a lot of talk about Biden’s son, that Biden stopped the prosecution and a lot of people want to find out about that so whatever you can do with *the Attorney General* would be great.”

“I will have Mr. Giuliani give you a call and I am also going to have *Attorney General Barr* call and we will get to the bottom of it.”

“I will tell Rudy and *Attorney General Barr* to call. . . .”

Thus, President Trump repeatedly told Ukraine President Zelensky to deal with Attorney General Barr on this highly improper matter. These quotes personally implicate Barr in a matter involving a gross abuse of presidential power.

Given the fact that Attorney General Barr was named by the President as a direct participant in this matter, Barr should have immediately, formally and publicly recused himself from any discussions and decisions regarding the Department’s handling of any aspect of this matter, including especially the whistleblower complaint itself. 28 C.F.R. § 45.2, *see also* 25 C.F.R. § 2635.502.

Since the whistleblower complaint stated that Attorney General Barr “appears to be involved” in the allegations made in the complaint, the Attorney General’s participation in or oversight of the Department’s handling of the complaint, at a minimum, “create[d] an appearance of a conflict of interest likely to affect the public perception of the integrity of the investigation or prosecution.” 28 C.F.R. § 45.2(b)(2).

According to published reports, however, Barr never consulted with DOJ ethics officials about whether he should recuse himself from matters dealing with the whistleblower complaint.¹⁶ Published reports also said that Barr was “generally knowledgeable” of discussions in the Justice Department about the complaint, thus indicating that he did not recuse himself in the Department’s handling of this matter.¹⁷

In response to a request from the Acting Director of National Intelligence (DNI) as to whether he should forward the whistleblower complaint to Congress, as required by statute, DOJ’s Office of Legal Counsel (OLC) concluded that the whistleblower complaint did not meet the statutory definition of an “urgent concern” and therefore that the Acting DNI did not have a statutory obligation to transmit the complaint to the Congress.¹⁸

¹⁶ D. Volz, W. Strobel and S. Hughes, “Whistleblower Complaint Alleges White House Effort to Conceal Details of Trump Call With Ukraine,” *The Wall Street Journal* (Sep. 26, 2019).

¹⁷ M. Zapotosky and D. Barrett, “Justice Dept. rejected investigation of Trump phone call just weeks after it began examining the matter,” *The Washington Post* (Sep. 25, 2019).

¹⁸ DOJ Office of Legal Counsel, Memorandum Opinion for the General Counsel Office of the Director of National Intelligence (Sept. 24, 2019).

Instead, the OLC determined that the complaint should be referred to the Department's Criminal Division for review of whether the actions described in the complaint constituted violations of the federal campaign finance laws. Following that referral, the Department then announced that the Criminal Division concluded that the complaint did not present any violations of federal law that warranted further investigation.¹⁹

By determining both that the law did not require the whistleblower complaint to be forwarded to Congress and that the complaint did not present any potential violations of federal law that warranted investigation, the Department of Justice took two separate actions that collectively had the result of shielding the complaint from public or congressional scrutiny and which, if successful, would have ensured that there would not be a full investigation of the allegations in the whistleblower complaint.

Although the actions taken by the Justice Department to prevent the complaint from reaching Congress and becoming public were unsuccessful, this does not mitigate the fact that the Attorney General improperly failed to recuse himself from the matter. While DOJ officials reportedly said Barr was not directly involved in decisions about the complaint, there is no way for the public to know what role Barr may have played, or how he might have directly or indirectly influenced Department officials by remaining "generally knowledgeable" of the matter. The resultant public doubt about Barr's role and the integrity of the Department's decision-making with regard to this sensitive matter is exactly why Barr should have immediately recused himself from the matter, and why Department rules required such recusal.

The President's repeated naming of Barr as a participant in the Ukraine matter, in his telephone conversation with President Zelensky, both directly implicated Barr in the President's gross abuse of power and also cast serious doubt on the institutional integrity and fairness of the Justice Department's actions with regard to the whistleblower complaint. These concerns were only magnified by Barr's wrongful failure to recuse himself immediately from any role in the Justice Department's handling of the matter. At a minimum, OPR should investigate the extent of Barr's involvement in the Department's actions on the whistleblower matter, the degree to which Barr was "generally knowledgeable" about the Department's actions and whether Barr violated the Department's rules by failing to recuse himself.

Conclusion

As noted repeatedly above, the core mission of the Department of Justice is "to ensure fair and impartial administration of justice for all Americans." In derogation of this mission, Attorney General Barr has in numerous matters of high visibility and importance acted in a biased manner to favor and promote the personal and political interests of President Trump over the fair and impartial administration of justice.

Barr challenged and undermined the Department's own Inspector General who, after a thorough and independent investigation, reached conclusions about the origin of the 2016 investigation of the Trump campaign that did not align with President Trump's view of, and

¹⁹ D. Barrett *et al.*, "Trump offered Ukrainian president Justice Dept. help in investigation of Biden, memo shows," *The Washington Post* (Sept. 26, 2019).

interests in, the matter. Barr immediately criticized the Inspector General report which blunted its impact with the public and he continues to supervise a counter-investigation whose purpose apparently is to protect President Trump's personal and political interests in the matter.

Barr similarly acted in a biased manner by misrepresenting and thereby undermining the Special Counsel report and its criticisms of President Trump. Barr stage-managed the public release of the report and mischaracterized its conclusions, thereby setting a misleading public narrative about the findings of the report that would align with and be favorable to President Trump.

Barr has irresponsibly used inflammatory rhetoric about "spying" and "collusion" that echoed language used by President Trump in an effort to reinforce Trump's highly politicized and wrongful characterization of events.

Barr refused to recuse himself in the Department's involvement in the Ukraine whistleblower matter in which Barr was named by the President as one of his representatives in pursuing an improper investigation by Ukraine of a political opponent of the President.

This pattern of biased behavior by Barr is in stark conflict with his duty to ensure the "impartial administration of justice on behalf of all Americans." It is contrary to the mission, the norms, the rules, and the standards of conduct of the Justice Department and it seriously undermines the integrity and credibility of the Justice Department in the eyes of the American people.

Because you are responsible for safeguarding the institutional integrity of the Justice Department and the standards of behavior that govern its officials, Attorney General Barr's pattern of improper behavior warrants investigation and appropriate remedial action by your offices. Democracy 21 strongly calls on you to fulfill that responsibility.

Sincerely,

A handwritten signature in cursive script, appearing to read "Fred Wertheimer", followed by a horizontal line extending to the right.

Fred Wertheimer
President

Copy to:

Michael Horowitz, Inspector General