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Departmental Disciplinary Committee  
First Judicial Department  
Supreme Court, Appellate Division  
61 Broadway, 2<sup>nd</sup> Floor  
New York, New York 10006

*Via facsimile*  
(212) 287-1045

Re: Complaint of Attorney Misconduct

To Whom It May Concern:

On October 17, 2016, I submitted a grievance against U.S. Attorney General Loretta E. Lynch (New York Registration No. 2069516) for professional misconduct, namely the destruction of evidence. After sending the original grievance, I realized that the evidence destroyed by General Lynch's employees was not only pertinent to ongoing Congressional investigations, but various Freedom of Information Act requests and related litigation that was pending in the U.S. District Court for the District of Columbia. *See, e.g.,* Case Nos. 1:15-cv-00684, 1:15-cv-00687, 1:15-cv-00689, 1:15-cv-00690, 1:15-cv-00692, 1:15-cv-00688, and 1:15-cv-00691 (all of which are entitled *Judicial Watch, Inc. v. U.S. Department of State*), and Case No. 1:16-cv-00048, *Citizens United, Inc. v. U.S. Department of State*.

As a result, General Lynch was a party to the destruction of evidence sought by two separate, co-equal branches of government. I am aware of no law that would permit her to destroy evidence under those circumstances. You may wish to contact the attorneys representing Judicial Watch, Inc. and Citizens United, Inc. for more information about the relevance of the evidence that was destroyed. Paul Orfanedes is the director of litigation for Judicial Watch, and he may be reached at (888) 593-8442. Michael Boos is the general counsel for Citizens United, and he may be reached at (202) 547-5420.

Thank you for your attention to these matters.

Respectfully,



Ty Clevenger

cc: Mr. Paul Orfanedes  
Mr. Michael Boos