

594(e), and, "in an abundance of caution and to avoid any challenge to this Office's jurisdiction" on the ground that a referral order from the Special Division was necessary, also requested that the Court enter an order, pursuant to 28 U.S.C. § 594(e), referring the same matters to the Office.³⁴ On April 4, 1996, the Special Division issued an order under seal referring to this Office the questions of "[w]hether Hillary Rodham Clinton committed a violation of any federal criminal law (other than a Class B or C misdemeanor or infraction), including false statements or obstruction of justice, relating in any way to information provided on her behalf or statements made on her behalf to the General Accounting Office concerning the May 19, 1993 firing of employees of the White House Travel Office,"³⁵ and relating to "information provided by [Hillary Rodham Clinton] or on her behalf or statements made by her or on her behalf to the Congress of the United States."³⁶

B. Investigative Steps Taken by the Office of the Independent Counsel.

Following the expansion of the Independent Counsel's jurisdiction by the Special Division to include the Travel Office matter, the Independent Counsel assembled a team of attorneys, agents, paralegals, and support staff to conduct the investigation. This report is the culmination of the investigative work of more than ten attorneys, including Assistant United States Attorneys detailed by the Department of Justice to this Office, several other career prosecutors, and senior OIC staff.

³⁴ Notice of Acceptance of Referral and Application for Order of Referral Pursuant to 28 U.S.C. § 594(e), In re: Madison Guaranty Savings & Loan Assoc., (In re: Hillary Rodham Clinton), Div. No. 94-1 (D.C. Cir. [Spec. Div.] April 1, 1996).

³⁵ Order at 1, In re: Madison Guaranty Savings & Loan Assoc., (In re: Hillary Rodham Clinton), Div. No. 94-1 (D.C. Cir. [Spec. Div.] April 4, 1996) (under seal).

³⁶ Id. at 1-2.

The Independent Counsel enlisted the services of experienced criminal investigators and FBI agents already detailed to the OIC. These agents identified, located, and interviewed witnesses, reconstructed and analyzed evidence of the relevant events during the time periods before and after the Travel Office firings, and reviewed and analyzed the multiple investigations of those firings.

The OIC gathered and thoroughly reviewed the existing record on the Travel Office firings created by the House Government Reform and Oversight Committee, General Accounting Office, Office of Professional Responsibility, Office of Inspector General of the Department of the Treasury, Federal Bureau of Investigation, and the White House Travel Office Management Review investigations. Expanding on this record, the OIC identified, interviewed, and took sworn testimony of more than 127 witnesses regarding their knowledge of matters within the scope of the OIC's Travel Office Investigation.

Several federal grand juries in the District of Columbia were involved in the investigation of these matters. Between April 1996 and January 1999, these grand juries issued 125 subpoenas seeking witness testimony, as well as 89 subpoenas seeking the production of documentary evidence. The document subpoenas resulted in the production of over 55,000 pages of documents. In addition, there were five voluntary productions totaling more than 3,000 pages of documents.

C. Lack of Cooperation by Witnesses.

Many witnesses encountered during the investigation were not forthcoming. A description of specific examples is set forth in greater detail at Appendix A.

Witnesses' lack of cooperation took several forms. For example, some witnesses asserted unfounded claims of privilege. The White House Counsel's Office asserted that an attorney-