

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JUDICIAL WATCH, INC.)

Plaintiff,)

v.)

Case No. 1:15-cv-00785-JEB

REX W. TILLERSON,)

in his official capacity as)

Secretary of State of the United States)

Defendant.)

CAUSE OF ACTION INSTITUTE)

Plaintiff,)

v.)

Case No. 1:15-cv-01068-JEB

REX W. TILLERSON,)

in his official capacity as)

Secretary of State of the United States)

and)

DAVID S. FERRIERO,)

in his official capacity as)

Archivist of the United States)

Defendants.)

DECLARATION OF MATTHEW CONTINETTI

I, Matthew Continetti, declare and state as follows:

1. My name is Matthew Continetti and I am editor in chief of the *Washington Free Beacon*. I have held this position since 2012. The *Washington Free Beacon* is an independent news publication based in Arlington, Virginia. The *Washington Free Beacon* produces in-depth investigative reporting on a wide range of issues, including public policy, government affairs,

international security, and media. As editor in chief, I direct all editorial operations of the publication. Before joining the *Washington Free Beacon*, I worked as a political journalist and opinion writer for nine years, and published articles on current affairs topics in a range of leading newspapers and magazines.

2. As part of its reporting on politics and government affairs, the *Washington Free Beacon* has covered the FBI investigation into Hillary Clinton's use of a private email server while Secretary of State. This matter is one of intense public interest given Secretary Clinton's nomination in 2016 by the Democratic Party for the presidency of the United States, high-profile positions in government, and continued involvement in public life.

3. In particular, the issue of whether emails containing classified information were sent through unsecured email accounts is of significant public interest in light of the security concerns it raises. The *Washington Free Beacon* has reported on this issue in depth. *See, e.g.,* Madeleine Weast, *Watchdog Group Releases 29 Previously Undisclosed Clinton Emails*, WASH. FREE BEACON (Mar. 29, 2017), <http://freebeacon.com/national-security/watchdog-group-releases-29-undisclosed-clinton-emails/>.

4. I understand that in this case, Plaintiffs seek to have released an unredacted version of a declaration signed by E.W. Priestap of the FBI which identifies the targets and scope of grand jury subpoenas issued during the grand jury's investigation into Secretary Clinton's use of a private email server. The fact of the FBI's investigation has long been a matter of public knowledge and public interest. The more facts that are made public about this investigation, the better equipped the public will be to assess the merits and outcome of the investigation. Indeed, former FBI Director James Comey, in announcing that the Bureau would not recommend prosecution of Secretary Clinton, stated that he was making public more details than usual

“because I think the American people deserve those details in a case of intense public interest.”

See Bill Gertz, *FBI: ‘Hostile Actors’ Likely Hacked Clinton Email Secrets*, WASH. FREE BEACON (July 6, 2016), <http://freebeacon.com/issues/fbi-hostile-actors-likely-hacked-clinton-email-secrets/>.

5. It is essential for the public to understand the full scope and breadth of the FBI’s investigation into Secretary Clinton’s email server for the public to make an informed decision about what transpired during Secretary Clinton’s service at the State Department. I believe the information sought by Plaintiffs would be of significant public interest and of interest to the readers of the *Washington Free Beacon*.

6. Stories regarding Secretary Clinton’s email use are widely read on the *Washington Free Beacon*’s website. The issue continues to be a focus of public attention and a central factor in public scrutiny of the FBI. In more than a decade of writing about politics and government affairs, both at the *Washington Free Beacon* and at other publications, I have seen few issues capture and hold the public interest as extensively as that of Secretary Clinton’s emails. Increased public knowledge about her use of a private server and the FBI’s investigation into it will serve well our readers and the public as they make decisions about their government.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 27, 2017.


MATTHEW CONTINETTI