

**SUBPOENA**

**BY AUTHORITY OF THE HOUSE OF REPRESENTATIVES OF THE  
CONGRESS OF THE UNITED STATES OF AMERICA**

To The Honorable Hillary R. Clinton

You are hereby commanded to be and appear before the \_\_\_\_\_  
Select Committee on the Events Surrounding the 2012 Terrorist Attack in Benghazi  
of the House of Representatives of the United States at the place, date and time specified below.

**to testify** touching matters of inquiry committed to said committee or subcommittee; and you are not to depart without leave of said committee or subcommittee.

Place of testimony: _____	
Date: _____	Time: _____

**to produce the things identified on the attached schedule** touching matters of inquiry committed to said committee or subcommittee; and you are not to depart without leave of said committee or subcommittee.

Place of production: <u>1036 Longworth House Office Building, Washington, D.C. 20515</u>	
Date: <u>Friday, March 13, 2015</u>	Time: <u>12:00 p.m.</u>

To any authorized staff member or the U.S. Marshals Service

\_\_\_\_\_ to serve and make return.

Witness my hand and the seal of the House of Representatives of the United States,  
at the city of Washington, this 4<sup>th</sup> day of March, 2015

  
\_\_\_\_\_  
Chairman or Authorized Member

Attest:  
Karen P. Haas  
Clerk

**PROOF OF SERVICE**

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Subpoena for

The Honorable Hillary R. Clinton

Address Per agreement with David E. Kendall, Esq. the service will be completed by email to

David Kendall at Williams & Connolly LLP at [dkendall@wc.com](mailto:dkendall@wc.com)

before the Select Committee on the Events Surrounding the 2012 Terrorist Attack in Benghazi

U.S. House of Representatives  
114<sup>th</sup> Congress

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Served by (print name)

DANA K. CHIPMAN

Title

Chief Counsel, House Select Committee on Benghazi

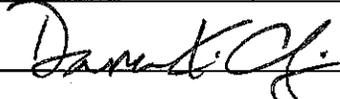
Manner of service

EMAIL TRANSMISSION - BY CONSENT

Date

March 4, 2015

Signature of Server



Address 1036 Longworth House Office Building, Washington, D.C. 20515

## SCHEDULE

In accordance with the attached schedule instructions and definitions, you, Hillary R. Clinton, are required to produce all records in unredacted form described below:

1. For the time period of January 1, 2011 through December 31, 2012, any and all documents and communications in your possession, and/or sent from or received by the email addresses "hdr22@clintonemail.com," "hrod17@clintonemail.com," or any other email address or communications device used by you or another on your behalf, referring or relating to:
  - (a) Libya (including but not limited to Benghazi and Tripoli);
  - (b) weapons located or found in, imported or brought into, and/or exported or removed from Libya;
  - (c) the attacks on U.S. facilities in Benghazi, Libya on September 11, 2012 and September 12, 2012; or
  - (d) statements pertaining to the attacks on U.S. facilities in Benghazi, Libya on September 11, 2012 and September 12, 2012.

### Schedule Instructions

1. In complying with this subpoena, you are required to produce all responsive documents that are in your possession, custody, or control, whether held by you or your past or present agents, employees, and representatives acting on your behalf. You should also produce documents that you have a legal right to obtain, that you have a right to copy or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party. Subpoenaed records, documents, data or information should not be destroyed, modified, removed, transferred or otherwise made inaccessible to the Committee.
2. In the event that any entity, organization or individual denoted in this subpoena has been, or is also known by any other name than that herein denoted, the subpoena shall be read also to include that alternative identification.
3. The Committee's preference is to receive documents in electronic form (i.e., CD, memory stick, or thumb drive) in lieu of paper productions.
4. Documents produced in electronic format should also be organized, identified, and indexed electronically.
5. Electronic document productions should be prepared according to the following standards:
  - (a) The production should consist of single page Tagged Image File ("TIF"), files accompanied by a Concordance-format load file, an Opticon reference file, and a file defining the fields and character lengths of the load file.
  - (b) Document numbers in the load file should match document Bates numbers and TIF file names.
  - (c) If the production is completed through a series of multiple partial productions, field names and file order in all load files should match.
6. Documents produced to the Committee should include an index describing the contents of the production. To the extent more than one CD, hard drive, memory stick, thumb drive, box or folder is produced, each CD, hard drive, memory stick, thumb drive, box or folder should contain an index describing its contents.
7. Documents produced in response to this subpoena shall be produced together with copies of file labels, dividers or identifying markers with which they were associated when the subpoena was served.
8. When you produce documents, you should identify the paragraph in the Committee's schedule to which the documents respond.
9. It shall not be a basis for refusal to produce documents that any other person or entity also possesses non-identical or identical copies of the same documents.

10. If any of the subpoenaed information is only reasonably available in machine-readable form (such as on a computer server, hard drive, or computer backup tape), you should consult with the Committee staff to determine the appropriate format in which to produce the information.
11. If compliance with the subpoena cannot be made in full by March 13, 2015 at 12:00 p.m., compliance shall be made to the extent possible by that date. An explanation of why full compliance is not possible shall be provided no later than March 12, 2015 at 12:00 p.m.
12. In the event that a document is withheld on the basis of privilege, provide a privilege log containing the following information concerning any such document: (a) the privilege asserted; (b) the type of document; (c) the general subject matter; (d) the date, author and addressee; and (e) the relationship of the author and addressee to each other.
13. If any document responsive to this subpoena was, but no longer is, in your possession, custody, or control, identify the document (stating its date, author, subject and recipients) and explain the circumstances under which the document ceased to be in your possession, custody, or control.
14. If a date or other descriptive detail set forth in this subpoena referring to a document is inaccurate, but the actual date or other descriptive detail is known to you or is otherwise apparent from the context of the subpoena, you are required to produce all documents which would be responsive as if the date or other descriptive detail were correct.
15. The time period covered by this subpoena is from January 1, 2011 to December 31, 2012.
16. This subpoena is continuing in nature and applies to any newly-discovered information as to the time period January 1, 2011 to December 31, 2012. Any responsive record, document, compilation of data or information, not produced because it has not been located or discovered by the return date, shall be produced immediately upon subsequent location or discovery.
17. All documents shall be Bates-stamped sequentially and produced sequentially.
18. Two sets of documents shall be delivered, one set to the Majority Staff and one set to the Minority Staff. When documents are produced to the Committee, production sets shall be delivered to the Majority Staff in Room 1036 of the Longworth House Office Building and the Minority Staff in Room B241 of the Longworth House Office Building.
19. Upon completion of the document production, you should submit a written certification, signed by you or your counsel, stating that: (1) a diligent search has been completed of all documents in your possession, custody, or control which reasonably could contain responsive documents; and (2) all documents located during the search that are responsive have been produced to the Committee.

### Schedule Definitions

1. The term “document” means any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including, but not limited to, the following: memoranda, reports, cables, records, correspondence, letters, notes, manuals, instructions, financial reports, working papers, inter-office and intra-office communications, messages, electronic mail (e-mail), summaries or notations of any type of conversation, telephone or cellular call, meeting or other communication, transcripts, diaries, analyses, minutes, projections, comparisons, contracts, press releases, reviews, opinions, studies and investigations, (and all drafts, preliminary versions, alterations, modifications, revisions, changes, and amendments of any of the foregoing, as well as any attachments or appendices thereto), and graphic or oral records or representations of any kind (including without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings and motion pictures), and electronic, mechanical, and electric records or representations of any kind (including, without limitation, tapes, cassettes, disks, and recordings) and other written, printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, film, tape, disk, videotape or otherwise. A document bearing any notation not a part of the original text is to be considered a separate document. A draft or non-identical copy is a separate document within the meaning of this term.
2. The term “communication” means each manner or means of disclosure or exchange of information, regardless of means utilized, whether oral, electronic, by document, or otherwise, and whether in a meeting, by telephone, facsimile, e-mail (desktop or mobile device), text message, instant message, MMS or SMS message, regular mail, telexes, releases, or otherwise. Communications “sent to or received by” includes any means of transmission or receipt including but not limited to communications that are copied, blind copied or forwarded. Additionally, any communication that incorporates, contains, or attaches another document or communication shall include that additional document or communication.
3. The terms “and” and “or” shall be construed broadly and either conjunctively or disjunctively to bring within the scope of this request/subpoena any information which might otherwise be construed to be outside its scope. The singular includes plural number, and vice versa. The masculine includes the feminine and neuter genders.
4. The term “referring or relating,” with respect to any given subject, means anything that constitutes, contains, embodies, reflects, identifies, states, refers to, deals with or is pertinent to that subject in any manner whatsoever.
5. The term “weapons” includes any instrument, tool, or device for use in an attack or defense, to include but not be limited to firearms, grenades, mortars, missiles, MANPADS (man-portable air-defense systems), CBRNE (chemical, biological, radiological, nuclear, explosives) devices.