

THE WHITE HOUSE
WASHINGTON

November 7, 1994

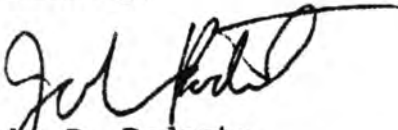
Ms. Amanda Wilson
RR 4, Box 312
Canton, New York 13617

Dear Ms. Wilson:

Thank you for your recent letter inquiring about employment possibilities in my office at the White House. Unfortunately, there are no openings at this time, however, we will keep your resume on file for future reference.

Again, thank you for your interest.

Sincerely,



John D. Podesta
Assistant to the President
and Staff Secretary

AMANDA WILSON

RR 4, Box 312
Canton, NY 13617
(315) 386-2533

94 NOV 3 P2:11

November 1, 1994

John Podesta
Assistant to the President and
Staff Secretary
THE WHITE HOUSE
1600 Pennsylvania Avenue, NW
Washington, DC 20500

Tommy Ledone

Dear Mr. Podesta:

It is with great pleasure that I submit to you my resume. I will relocate to Washington in the near future. Currently, I am forwarding information to the White House Executive Offices in hopes of securing employment. I believe Washington is a great city to live in, and it would be an honor to work in your office.

Mr. Podesta--please be assured that you will find me reliable, competent, enthusiastic, and determined to do my best. I possess a positive attitude, excellent writing and communication skills, and a high standard of ethics.

If you seek additional information, please contact me. I look forward to hearing from you. Continued success!

In support,

Amanda

Amanda Wilson

Enclosure

AMANDA WILSON

RR 4, Box 312
Canton, NY 13617
(315) 386-2533

Education:

Parishville-Hopkinton Central School
Graduated 1974 -- Business
Massena School of Business
Business Certificate Awarded 1975
San Francisco State University
Journalism/Communications (3 Semesters Pending)
Various Seminars and Extension Classes Completed

Work Experience:

6/1/93 to Present Central Services, St. Lawrence County, Canton, NY 13617

Secretary II

Prepare and maintain payroll certifications for municipalities--Organize/maintain computer and telephone maintenance and billings for all county offices--Network with various telephone companies (i.e., installations, respond to inquiries, problem-solving solutions)--Codification of Local Laws and Resolutions on behalf of St. Lawrence County Board of Legislators--Plan/present Time Management and Team Facilitation Seminars to county employees--Develop, coordinate and maintain DWI/DWAI Collection System for Probation Department with various local courts--Assist Personnel and Data Processing Departments with workload--Communicate and follow-through with special projects assigned by Director of Central Services--Requires excellent managerial and communication skills.

10/92 to 5/93 St. Lawrence University, Canton, NY 13617

Secretary/Administrative Assistant

Employed on a temporary basis to assist various departments as needed-- Departments included University Communications, History, Philosophy, and the C-Step Program--Duties included correspondence, phones, recruitment, bookkeeping, press releases, and general office duties as assigned-- Adaptability a must.

5/92 to 9/92 Faces+, Route 3, Potsdam, NY 13676

Image Consultant/Sales (Owner/Operator)

Introduction/Distribution of quality skin care and cosmetic products-- Schedule/Present Image Clinics-- Direct/Coordinate Image Development Workshops--Publish Faces+ Focus Newsletter--Implementation of Client Database--Various job-related assignments and duties.

1/92 to 4/92 St. Lawrence County District Attorney, Madrid, NY

Confidential Secretary to District Attorney

Coordinated all Grand Jury paperwork (Indictments, Ballots, Orders, Press Releases, and Calendars)-- Processed payroll and personnel records-- Transcription and Dictation--Created and managed filing system--Tracked felony records--Scheduled County Court Calendar--Maintained Prosecution Grant (Monthly and Quarterly filings)--Prepared all billings, work orders, and purchase orders--Various office duties.

8/90 to 12/91 Music Theater North, Potsdam, NY 13676

Administrative Assistant/Company Manager

Preparation of all seasonal contracts with performers--Managed payroll for approximately 140 individuals during summer performances--Coordinated housing schedule and worked with building and ground crews regarding maintenance--Processed Box Office Sales--Coordinated activities with MTN's Volunteer Guild--Assigned MAN projects for completion within specified timeframe--Assisted with public relations and advertising--General office responsibilities, such as correspondence, record keeping, and telephones--Word Perfect 5.1 and Database.

1/90 to 5/90 Penski, Inc., Potsdam, NY 13676

Intake Coordinator -- Temporary Assignment

Initial screening of telephone applicants and direct walk-ins--Screen, test, interview, and assist in placement of skilled applicants--Collaborating with Placement Coordinators in job searches--Input and retrieve information regarding applicants and assignees--Formulating filing/general office procedures functional to related job tasks--Word Perfect 5.1 and Database.

2/82 to 10/89 Kaplan & Pasvankias, 473 Jackson St., San Francisco, CA

Legal Assistant

Assisted in all phases of Bankruptcy/Trustee and Receiverships--Filing Chapter 7, 11, and 13 of the U.S. Bankruptcy Code, including Disclosure Statements and Plans of Reorganization--Maintained legal/financial overviews of Trustee and Receivership properties (hotels, restaurants, apartment complexes, office buildings)--Heavy phones and follow-up with interested parties--Fast-paced Office--Problem solving, attention to detail, ability to communicate well, and independent judgment a must-- Transcription/speed notes--Paralegal/Office management procedures--Word Perfect 5.0.

10/79 -- 9/83 Golden Gate Theater, Taylor Street, San Francisco, CA

Concessions Supervisor

Supervised concessions staff--Preparation of inventory and sales reports Evaluated beverage control and sales--Heavy Public Contact--Arranged Catering services to performers and stage staff--Implemented and refined management procedures.

REFERENCES FURNISHED UPON REQUEST

THE WHITE HOUSE
WASHINGTON

November 4, 1994

Ms. Betsey Wright
The Wexler Group
1317 F Street, N.W.
Suite 600
Washington, D.C. 20004

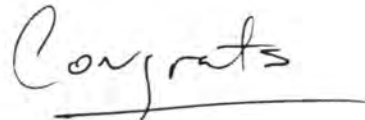
Dear Betsey:

Congratulations on all your hard work which led to passage of H.R. 5200, the Crow Boundary Settlement Act. I am pleased to send you the pen that President Clinton used to sign the Act into Law. In addition, I am enclosing 4 copies of the red line edition of the Act and a commemorative pen from the signing ceremony.

Thanks again for your help.

Sincerely,


John D. Podesta
Assistant to the President
and Staff Secretary



THE WHITE HOUSE
WASHINGTON

12-21-93

Vicki -

Congratulations on the
recently announced appointment.
(You've probably been at USDA
for six months, but we're a
little slow to get the word
around.) Let me know
if I can ever be of help.

Have a happy holiday.

John Podesta

MEMORANDUM

TO: Distribution List
FROM: Bruce Lindsey
DATE:: December 15, 1993
RE: SES Announcements

93 DEC 16 P1:13

The following SES Candidates have been approved by the President, cleared by the White House Counsel and are ready to be announced:

U.S. Department of Agriculture

Vicki J. Hicks

Assistant Deputy Administrator for Commodity Operations,
Agriculture Stabilization & Conservation Service

Ms. Hicks joins the Department of Agriculture from Senator Jocelyn Birch Burdick's office where she has served as a senior legislative assistant since September of 1992, and previously for the late Senator Quentin N. Burdick, since 1987. In that capacity, she advised the Senator on issues and legislation relating to international trade, foreign affairs, agriculture and agriculture-related environmental issues. Prior to 1987, Ms. Hicks served as a policy analyst for the Office of Antiboycott Compliance at the International Trade Administration. In that office, her responsibilities included policy development, drafting regulatory revisions and interpretations of regulations. In 1984, Ms. Hicks worked as an international trade consultant where she analyzed U.S. and foreign government programs and policies to determine their impact on export levels and recommended changes in government programs and multi-lateral lending practices. From 1983 to 1984, she was an associate attorney with the law firm of Balsamo & Dominiguez in Washington, D.C., where her areas of practice included international business transactions, international trade, export licensing and export finance. From 1982 to 1983, Ms. Hicks was a staff attorney with Jackson & Campbell, also in Washington, D.C. At Jackson & Campbell, her areas of practice included administrative law, corporate law and medical malpractice defense. Ms. Hicks received her J.D. in 1981 from the University of Oklahoma College of Law. In 1980, she also attended the Warsaw University Faculty of Law in Warsaw, Poland where she studied east-west trade and comparative socialist law in Moscow, Leningrad and Warsaw. Ms. Hicks also received her B.S. in political science from Phillips University in Enid, Oklahoma in 1978.

Mary Ann Keffe

Deputy Administrator for Special Nutrition Programs, Food & Nutrition Service

Ms. Keffe joins the Department of Agriculture from the International Brotherhood of Teamsters where she has been the director of the research department since 1983. In that capacity, she structured and hired all personnel for the newly created research department and was responsible for its overall direction, operation and supervision of staff. Another major responsibility was the coordination of the negotiating process for large national labor contracts where proposals were assembled, periodic summaries of negotiations were provided and final contract language was prepared. She also recently served as Coordinator for the Teamsters/Clinton-Gore Campaign organization. Prior to 1983, Ms. Keffe was with the Library of Congress in Congressional Research Service where she was an economic analyst in business and government. She provided research and legislative analysis in multiple fields of developed expertise including: consumer affairs, postal rates, transportation, and communications. From 1966 to 1967, Ms. Keffe worked as a congressional liaison with the Office of the Postmaster General in the U.S. Post Office Department. Ms. Keffe has been active for over twenty years in local and national Democratic Party politics and presently is an elected member of the Maryland State Democratic Committee. Ms. Keffe is a graduate of the Barat College of the Sacred Heart in Lake Forest, Illinois where she earned her B.A. in political science in 1966, receiving departmental honors.

R. Alan King

Deputy Administrator for Commodity Operations,
Agriculture Stabilization & Conservation Service

Mr. King rejoins the Agriculture Stabilization & Conservation Service from the ASCS where he had been a career employee on the county level from 1967 to 1992. During that time, he served in various positions including: assistant to the deputy administrator, Missouri State executive director, and county executive director. From 1973 to 1991, Mr. King was the president and owner of Red Tail, Inc., dba Red Barn Restaurant. From 1962 to 1975, Mr. King was the majority stockholder and manager of King Farms, Inc and King Investments. Prior to 1962, Mr. King was a science instructor at Stockton, Missouri High School. Some of Mr. King's many accomplishments include: testifying before U.S. Senate Appropriations Committees supporting environmental quality and rural clean water legislation; receiving the American Farmer Degree from the National Future Farmers of America Organization; serving as a search committee member to select the dean for the University of Missouri College of Agriculture; and receiving the Shoe-Me Cattleman Award for service to the beef industry. A few of Mr. King's many affiliations include: county president of the Missouri Farm Bureau; state president of the Missouri Cattlemens Association; board member of the National Cattlemens Association; president of the Missouri Hereford Association; and state president of the Missouri Future Farmers of America. In 1957, Mr. King received his B.S. in agricultural education from the University of Missouri-Columbia. He completed some graduate work in 1960 at Drury College in Springfield, Missouri. In 1981, he completed the Senior Executive Service Candidate Development Program at the U.S. Dairy Association.

U.S. Department of Energy

Daniel C. Tate, Jr.

Deputy Assistant Secretary for House Liaison,
Congressional, Intergovernmental & International Affairs

Mr. Tate joins the Department of Energy from U.S. Congressman W.J. "Billy" Tauzin's office where he began as a legislative assistant in 1989. Since then, Mr. Tate has been promoted to legislative administrator, then to legislative director. In his most recent role of legislative director, he managed the legislative and political agenda for the senior member of the Energy and Commerce Committee; coordinated the Congressman's activities on the Democratic Steering & Policy Committee; and supervised the legislative staff and correspondence. In 1988, Mr. Tate served as an issues aid for Robb for Senate where he compiled information and analyzed data for policy papers, candidate debates, and fundraising. From 1988 to 1989, he worked in Special Events at the Cable News Network, where he managed floor access and served as a liaison for foreign and domestic broadcasters covering the Democratic National Convention. He also coordinated media activities at the White House and Lafayette Square, the Inaugural Site. In 1987, Mr. Tate worked for Wexler, Reynolds, Harrison and Schule where he completed a research/legislative internship with the government relations firm. In 1984, Mr. Tate was a volunteer campaign assistant/field organizer for the Mondale for President Committee. In 1988, Mr. Tate graduated with honors from Amherst College in Massachusetts, earning his B.A. in political science and english.

U.S. Environmental Protection Agency

Denise T. Graveline

Deputy Associate Administrator, Communications and Public Affairs

Ms. Graveline joins the Environmental Protection Agency from the American Association for the Advancement of Science where she has been the director of the Office of Communications. Since August of 1990, she has directed communications efforts and served as the primary spokesperson for the world's largest general scientific organization. In addition, Ms. Graveline interpreted and released research findings; generated media coverage of the AAAS Annual Meeting and of programs, meetings, awards and reports in the Association's program areas. Prior to her work at the AAAS, Ms. Graveline served as the communications officers at the Robert Wood Johnson Foundation in Princeton, New Jersey. In that capacity, she directed media relations; served as a primary spokesperson for the nation's largest health care philanthropy; and served as a voting member of the foundation's program staff. Prior to 1987, Ms. Graveline worked as an independent writer and consultant for more than three years where she specialized in writing, editing and policy research for national publications and organizations. From June of 1981 through April of 1984, she was with Whittle Communications where she was the magazine editor, writer and developer. Ms. Graveline is a member of the American Association for the Advancement of Science\Westinghouse Science Journal Awards, American Association for World Health\World Health Organization, D C

(Graveline continued)

Science Writers Association, Education Writers Association, and National Association of Science Writers. Ms. Graveline has spoken on a range of subjects including AIDS funding, grantseeking, communications strategies for community organizations, and AIDS and the media. Ms. Graveline earned her B.S. from Boston University School of Public Communications where she graduated *magna cum laude*. She also received the Association Award for outstanding undergraduate leadership.

The Communications Office is authorized to announce these individuals at noon on Friday, December 17, 1993. Legislative Affairs, Intergovernmental Affairs, Political Affairs and Public Liaison are advised that they should notify all interested parties prior to the announcement.

THE WHITE HOUSE

WASHINGTON

December 10, 1993

The Honorable Ruth Bader Ginsburg
Associate Justice
Supreme Court of
the United States
Washington, D.C. 20543

Dear Madam Justice:

I wanted to thank you for taking the time to swear in the new members of the Administrative Conference of the United States. It was a great honor for me personally and, I know, for the other new members as well.

It was also a treat to learn something about the history of the oath and to finally understand why we needed a NAFTA side agreement on pickled fish!

Enjoy the holiday season.

Sincerely,

A handwritten signature in black ink, appearing to be 'JP' or 'John', written in a cursive style.

John Podesta
Assistant to the President
and Staff Secretary

THE WHITE HOUSE
WASHINGTON

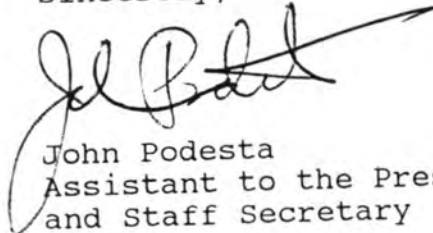
December 1, 1993

Mr. David Tillotson
Suite 1739
3421 M Street, N.W.
Washington, D.C. 20007

Dear David:

Thank you for the information concerning
John Payton. I appreciate your interest in
this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "John Podesta", with a long horizontal stroke extending to the right.

John Podesta
Assistant to the President
and Staff Secretary

DAVID TILLOTSON
ATTORNEY AT LAW

3421 M STREET, N.W., STE. 1739
WASHINGTON, DC 20007

TELEPHONE: (202) 625-6241
FACSIMILE: (202) 965-2018

November 10, 1993

The Honorable John Podesta
Assistant to the President
The White House
Washington, DC 20500

Dear Mr. Podesta:

To follow-up on our conversation earlier today regarding the proposed nomination of John Payton to be the head of the Civil Rights Division at Justice, I am enclosing a summary of comments made by federal court judge's criticizing the litigation section of the Office of the Corporation Counsel for how it has handled litigation involving the DC Department of Corrections. I did not prepare this summary, but it is my understanding that much of this litigation involved civil rights issues. As Corporation Counsel, Mr. Payton is responsible for the dilatory conduct and other improper trial tactics recited in the enclosed materials under the Truman doctrine of "the buck stops here."

I am also enclosing a copy of my letter to the President which sets forth other reasons why I believe that John Payton is unqualified to head the Civil Rights Division.

Sincerely,


David Tillotson

Enclosure

DAVID TILLOTSON

ATTORNEY AT LAW

3421 M STREET, N.W., STE. 1739
WASHINGTON, DC 20007

TELEPHONE: (202) 625-6241
FACSIMILE: (202) 965-2018

November 8, 1993

President Bill Clinton
The White House
Washington, DC

Dear President Clinton:

The purpose of this letter is to strenuously object to the nomination of John Payton to head the Civil Rights Division at the Department of Justice on the grounds that Mr. Payton, as Corporation Counsel of the District of Columbia, has been insensitive and indifferent to serious civil rights abuses by the District of Columbia's police. The principal reasons for my objection to Mr. Payton's appointment are set forth in the enclosed letter that opposing the nomination that I sent to the Washington Post.

The problem of civil rights abuses by the DC police department is long standing and well documented. If Mr. Payton were committed to civil rights, as Corporation Counsel he would have taken effective action within the Office of the Corporation Counsel and as the chief legal advisor to the City to put an end to the police department's civil rights abuses. He has not done so. Therefore, he should not be entrusted with the responsibility of being the chief civil rights officer for the nation.

Sincerely,

David Tillotson

Enclosure

DAVID TILLOTSON
Attorney at Law

3421 M Street, N.W., #1739
Washington, D.C. 20007

Telephone: (202) 625-6241
Facsimile: (202) 965-2018

November 6, 1993

Letters To the Editor
Washington Post
1150 15th Street, NW
Washington, DC

Dear Sirs/Madames:

The Congressional Black Caucus is right to oppose the nomination of Corporation Counsel John Payton to head the Civil Rights Division at the Department of Justice. The insensitivity and indifference of the Office of the Corporation Counsel under Mr. Payton's leadership to serious, everyday, violations of basic civil rights by the Metropolitan Police Department belies the claim of Mr. Payton's supporters that he has "a strong and deep commitment to the enforcement of civil rights laws" and should disqualify Mr. Payton for any position of responsibility in the civil rights area. I say this based on my first hand experience as an attorney in dealing with the Office of the Corporation counsel concerning police misconduct cases.

The Office of the Corporation Counsel under Mr. Payton's direction has supported and defended the practice and policy of the MPD of arresting people for "disorderly conduct" who talk back to, argue with, or otherwise show disrespect for a police officer, notwithstanding a 1988 decision of the Supreme Court (Houston v. Hill, 482 U.S. 451) which held that "[t]he freedom of individuals verbally to oppose or challenge police action without thereby risking arrest is one of the principal characteristics by which we distinguish a free nation from a police state." Moreover, rather than act to address the problem of abuse and misuse of disorderly arrests to harass and intimidate members of DC's Latino community which was cited in the findings of the U.S. Commission on Civil Rights' Report on the 1991 Mount Pleasant "disturbances," the Office of the Corporation Counsel dismisses the Commission's findings regarding misuse and abuse of disorderly conduct arrests as mistaken.

If Mr. Payton possessed a strong commitment to the enforcement of civil rights, he would have used his position as Corporation Counsel to instruct his clients, the Mayor and the Chief of Police, that the MPD's policy and practice of arresting people who verbally offend police officers is unconstitutional. Not only has he not done this, but it remains the official position of the Officer of the Corporation counsel that there is

nothing wrong with the MPD's use of "disorderly arrests" in a manner that the Supreme Court has characterized as one of the hallmarks of a police state.

Sincerely,

David Tillotson

Washington Post
11/11/93

No Retreat on Children's Rights

ADVOCATES of reforming the District's child welfare system now worry that the city is backing away from its legal commitment to overhaul a program already deemed by a federal judge to be an outright travesty. They point to D.C. Corporation Counsel John Payton, the leading candidate for the Justice Department's top civil rights job, who is spearheading an effort to vacate the federal consent decree that protects the rights of youngsters in the *LaShawn* child welfare case. U.S. District Judge Thomas Hogan, who decided the case and continues to monitor implementation of the consent decree, apparently shares their concerns. During a hearing yesterday, Judge Hogan invited Mr. Payton and Vincent Gray, the head of the Department of Human Services, to appear in his courtroom next month to explain "what it means to enter into a consent order and then attempt to withdraw from it on the basis of a court of appeals decision affirming the court's ruling." It's a good question that Mr. Payton must answer.

Mr. Payton is known to believe that many of the consent decrees negotiated during Marion Barry's mayoralty usurp the powers of locally elected leaders and constitute an unchecked drain on a cash-poor city. That is a view for which there is a good argument. But in trying to gut this particular

federal opinion and remedial order—particularly one negotiated by the Kelly administration and which has been largely affirmed by the court of appeals—**Mr. Payton has encouraged the impression that his attack is on the one measure that has clearly helped eased the plight of the city's most vulnerable children.**

To ease the fears generated by his resistance to the court's decision, Mr. Payton sent a letter last night to Mr. Gray stressing the need to energetically get on with the reform effort. He says his legal objections to the order shouldn't be taken as a sign that the city is not going to meet its obligations to fundamentally reform a badly flawed program. His critics say that behind the legalism is a city that is chafing under the order because it can't meet already agreed upon goals for reform. Whatever the merits of Mr. Payton's legal position, there remains an absolute requirement for the city to make it clear to the court and the public that it isn't retreating from its duty to help neglected and abused children. There is one way to do that. The corporation counsel should join in the redrafting of a *comprehensive* final order that relies solely on District child protection laws—and then get on with the business of meeting its obligations to those unfortunate children.

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United States District Court Judges have made the following other comments concerning the District's conduct in litigation concerning the Department of Corrections.¹³⁹

- The failure of the District of Columbia defendants to answer . . . amounts to either gross neglect, at best, or at worst, willful misconduct.¹⁴⁰
- Significantly, the Court finds that the defendants concealed . . . violations of the 1985 Order from this Court. . . The failure to report in the required manner has unnecessarily prolonged the discovery and proceedings in this case, and has hampered plaintiffs' ability to seek to enforce the orders of this Court to the detriment of the plaintiff class.¹⁴¹
- The District of Columbia has sought to crush the spirit and exhaust the resources of its opponents through a pattern of total nonresponsiveness. Such dilatory tactics must be deterred. If defendants' conduct in this case were not severely punished, future litigants might rationally conclude that the advantages accruing from abusing discovery outweigh the risks.¹⁴²

139 The District has been sanctioned in other corrections cases not listed. See e.g., Jane Doe v. District of Columbia, C.A. No. 92-635 (D.D.C.) (LFO), Order, January 13, 1993 (monetary sanction); Drew v. District of Columbia, C.A. No. 88-994 (D.D.C.) (GAG), Order November 14, 1990 (default entered); Edelen v. District of Columbia, C.A. No. 88-664 (D.D.C.) (SSH) Order, February 23, 1990 (default entered).

¹⁴⁰ Mention v. Kelly, C.A. No. 89-405 (D.D.C.) (DAR), Report and Recommendation III, July 22, 1993.

141 Campbell v. McGruder, C.A. No. 1462-71 (D.D.C.) (WBB);
Inmates of D.C. Jail v. Jackson, C.A. No. 75-1668 (D.D.C.) (WBB),
Order Appointing a Special Officer, April 20, 1993.

142 Coleman v. Long, C.A. No. 86-1029 (D.D.C.) (WBB),
Memorandum and Order, April 8, 1993.

VI. The District of Columbia is Routinely Sanctioned for Failing to Meet Litigation Obligations

In addition to failing to comply with court decrees, the District of Columbia is routinely sanctioned for failing to comply with discovery and other litigation related obligations. The District's conduct in these cases has been described by one Judge as follows:

[T]he court takes notice of the on going struggle between the federal judiciary and the District of Columbia to bring the District, and in particular the Correctional Litigation Section in the Office of the Corporation Counsel, into compliance with the discovery Rules.

In the past three years, the federal courts have been forced to sanction the District repeatedly for flagrant abuses of discovery. . . Comparing the discovery-related misconduct committed by the District before this court to that committed in [other cases] is a case of *deja vu* all over again. The District is certainly on notice as to where the problem lies: [prior cases in which discovery sanctions were ordered] all involved misconduct by counsel in the Correctional Litigation Section of the Corporation Counsel, as does the present case. The District obviously remains tempted to exploit the full panoply of discovery abuses for which it has received severe sanctions, including default, in the past. . . The District of Columbia cannot be permitted to achieve, whether through obduracy or sheer incompetence, tacit exemption from the Rules that bind all other litigants in the federal courts.¹³⁸

¹³⁸ Coleman v. Long, C.A. No. 86-1029 (D.D.C.) (WBB), Memorandum and order, April 8, 1993.

The Court in this case has granted repeated extensions of time to Corporation Counsel when the only stated reason was the "press of other business." In the pending motion to reconsider, the Corporation Counsel has failed to demonstrate that any corrective action whatsoever has been taken to preclude recurrence of the same derelictions in this and other cases. Since sanctions are authorized for their deterrent value, they are entirely appropriate here.¹⁴³

[The District] willfully failed to comply with the Court's order requiring complete discovery responses. . . Defendants' dilatory tactics have become part and parcel of their litigating techniques. . . This cannot continue. Although this is not the way the Court prefers to see constitutional litigation proceed, the Court has no choice in the matter. The defendants have been repeatedly warned that a sanction like this would be forthcoming if defendants continue to ignore the Court's orders.¹⁴⁴

This court noted in [a prior case] that the Corporation Counsel may not "fail to obey court-ordered discovery deadlines, repeatedly delay trials, and singlehandedly deny plaintiffs their rights to their day in court, and never be held accountable." Yet this is precisely the sort of behavior which defendant has demonstrated in this case. The protracted, willful, inexcusable abuse of the discovery process by [the Assistant Corporation Counsel], the District of Columbia, and defendant has thus forced the court to enter a default judgment in this case, in order to ensure that abuses such as these will not continue.¹⁴⁵

¹⁴³ Covington v. District of Columbia, C.A. No. 87-2658 (D.D.C.) (RCL), Findings of Fact and Conclusions of Law on Defendants' Motion to Reconsider Sanctions, February 20, 1990.

¹⁴⁴ Green v. District of Columbia, 134 F.R.D. 1, 3-4 (D.D.C. 1991)

¹⁴⁵ Monroe v. Ridley, 135 F.R.D. 1, 7 (D.D.C. 1990).

In addition to making it more difficult to litigate the merits of cases, the conduct of the Office of the Corporation Counsel compounds the problem of obtaining the District's compliance with court orders. Compliance reporting is often inaccurate,¹⁴⁶ and plaintiffs' efforts to obtain discovery concerning the District's compliance are thwarted.¹⁴⁷ Judge Bryant recently summed up the problem.

You ask for certain information and you get
horn-swoggled on it, you get

¹⁴⁶ See, e.g., Twelve John Does v. District of Columbia, C.A. No. 80-2136 (D.D.C.) (JLG), February/March 1992 Report of the Special Officer on Medical Services and Mental Health Staffing at the Central Facility, March 13, 1992 at 34. ("[T]he Special Officer recommends that the defendants' monthly compliance reports be submitted under oath or affirmation... [T]he defendants repeatedly submit compliance reports that are inaccurate."). See also, Campbell v. McGruder, Order appointing Special Officer at 3 (Significantly, the Court finds that the defendants concealed ... violation of the 1985 Order from the Court.").

¹⁴⁷ See Campbell v. McGruder, Order Appointing Special Officer, at 4.

[The Defendants' failure to file a Court Ordered] certification demonstrates, once again, how difficult it is for even this Court to obtain from the defendants reliable information necessary to monitor compliance with its orders. In this regard, the Court also finds that the defendants failed to produce in a timely manner numerous documents requested in discovery which evidenced significant problems in the delivery of medical and mental health care at the Jail. This was so even though many of these documents were clearly responsive to plaintiffs' document requests and were ordered to be produced pursuant to this Court's August 7, 1992 discovery order.

misrepresentations, concealment. That doesn't take any money. That doesn't take any resources. All it takes is plain integrity.¹⁴⁸

VII. Recommendations

The Department of Corrections has numerous problems for which extensive recommendations could be made. The following points, however, are limited to areas that can assist the District to come into compliance with its court-ordered obligations.

1. The creation of an independent board to oversee the operation of the Department of Corrections. The Board would monitor the Department of Corrections, issue reports and make recommendations to the Mayor and to the District of Columbia Council. This Board should be made up of officials from public safety agencies, citizens and prisoners' rights advocates.
2. The establishment of an office in the Department of Corrections to monitor the District's compliance with corrections related court orders. This office would be responsible for identifying compliance problems and initiating corrective action.

¹⁴⁸ Campbell v. McGruder, C.A. No. 1462-71 (D.D.C.) (WBB); Inmates of D.C. Jail v. Jackson, C.A. No. 75-1668 (D.D.C.) (WBB), Transcript of hearing on Plaintiffs' Motion for an Order to Show Cause why the Defendants should not be Held in Contempt, at 24, April 6, 1993.

THE WHITE HOUSE
WASHINGTON

November 22, 1993

Mr. Steven Garfinkel
Director
Information Security Oversight Office
750 17th Street, N.W., Suite 530
Washington, DC 20006

Dear Steve:

Thanks for the feedback about Paul's presentation. I was sorry that I was not able to participate in the symposium myself, but I am glad that Paul's contribution was so well received.

Paul and I look forward to working with you as the PRD process comes to a conclusion.

Sincerely,



John Podesta
Assistant to the President
and Staff Secretary



Information Security Oversight Office
750 17th Street, NW., Suite 530
Washington, DC 20006



November 10, 1993

Dear Mr. Podesta:

On behalf of the Information Security Oversight Office, please accept my sincerest appreciation for the extraordinary contribution made to our symposium, "National Security Information: The Future of Declassification," by your Deputy Staff Secretary, R. Paul Richard. His presentation set the tone for the symposium and helped the attendees to focus on enhancing the Government's declassification system so that it provides members of the public with greater access to information.

The entire symposium was extremely successful. We have received positive feedback from almost every attendee. Many of our guests have specifically mentioned Mr. Richard's presentation, seeking copies of our transcript of it, and the fact that he was able to spend an entire day with us. Many attendees valued the opportunity to discuss their perspectives with him. Moreover, Mr. Richard's interaction with the attendees demonstrated that the Administration has a significant concern for the declassification policies that it may establish.

Please pass on our appreciation to him for his excellent contribution.

Sincerely,

Steven Garfinkel
Director

The Honorable
John D. Podesta
Assistant to the President
and Staff Secretary
Ground Floor, West Wing
The White House
Washington, DC 20500



Dear Steve

I was sorry
not to be able to
to ~~make the~~ participate
in the symposium myself,
but

Thanks for the feedback
about Paul's presentation. ~~For the~~

I am glad ~~it came~~ that Paul's
contribution was so well received

Paul & I look forward to working
with you as the PRD process
findings comes to a conclusion.

Sincerely

THE WHITE HOUSE
WASHINGTON

11-18-93

Dan, Carol & Sara

Need less to say, I
am very happy that things
worked out. I look forward
to meeting Sara soon.

Enjoy this very special
Thanksgiving.

John

THE WHITE HOUSE
WASHINGTON

Mr. Dan Phythyon
Ms. Carol Young
8002 Ellingson Drive
Chevy Chase, MD 20815

8002 Ellingson Drive
Chevy Chase, MD 20815

November 12, 1993

33 NOV 17 A10:

Mr. John Podesta
Staff Secretary
Executive Office of the President
1600 Pennsylvania Ave., N.W.
Washington, D.C. 20500

Dear John:

We deeply appreciate your assistance in bringing Sara home. As you know, we had some difficult moments in Costa Rica, and without you, our stay -- courtesy of the US Embassy -- might have been indefinitely extended. It was gratifying to know that we had good friends like you who were so willing to help.

Although words cannot fully express our gratitude, we have enclosed another thousand. As you can see, she is worth every bit of effort that you and we expended.

Thanks again,



Carol Young, Dan Phythyon, and
Sara





MR. JOHN PODESTA
STAFF SECRETARY
EXECUTIVE OFFICE OF THE PRESIDENT
1600 PENNSYLVANIA AVE., N.W.
WASHINGTON, D.C. 20500

mail
to

Mike Remington

2

THE WHITE HOUSE
WASHINGTON

11-24-93

Mike —

Congratulations on joining
the new firm. I know
that you've known & enjoyed
working with Terris for many
years.

We need to catch up on
I.P. issues. Let's get together
after Thanksgiving.

Sincerely,

John

Mr. Michael J. Remington
Leonard, Ralston, Stanton
& Danks
Suite 609
1000 Thomas Jefferson Street, N.W.
Washington, D.C. 20007

LAW OFFICES OF

LEONARD, RALSTON, STANTON & DANKS

A PARTNERSHIP INCLUDING PROFESSIONAL ASSOCIATIONS

Jerris Leonard (D.C. & WI)
David T. Ralston, Jr. (D.C., VA & NY)
Thomas J. Stanton (VA)
Michael J. Remington (D.C. & WI)
Mary Gayle R. Holden (VA)
Susan M. Duchek (D.C. & HI)
Roderick B. Williams (VA)
Steve W. Stockman (VA)
Earl Keyes, PA (MS)
Dale Danks, Jr. (MS)
Tim Hancock (MS)

1000 Thomas Jefferson Street, N. W.
Suite 609, Georgetown
Washington, D. C. 20007
(202) 342-3342 FAX (202) 298-7810

Virginia Office:
21495 Ridgetop Circle
Suite 104 A
Sterling, Virginia 20166
703-450-5606
FAX 703-450-5628

Mississippi Office:
213 South Lamar Street
Post Office Box 2178
Jackson, MS 39225-2178
601-948-3100

November 15, 1993

Honorable John Podesta
Assistant to the President
and Staff Secretary
Ground Floor & West Wing
The White House
Washington, DC 20439

Dear Mr. Podesta:

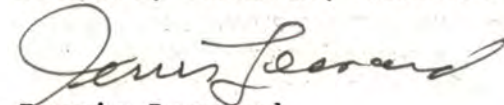
Our firm is pleased to announce that Michael J. Remington has joined us as a partner after many years of distinguished service in the United States Government. Mike will practice in the areas of intellectual property and constitutional law and will join us in our administrative and legislative practice.

Born and raised in Madison, Wisconsin, where his father is a well-know Professor of Law at the University, Mike graduated with honors from the University of Wisconsin (B.S., 1967) and the University of Wisconsin Law School (J.D., 1973).

From 1969-71, Mike was a Peace Corps volunteer in the Ivory Coast. After law school he served as a law clerk to a Federal District Judge, became a trial attorney in the United States Department of Justice and more recently Chief Counsel of the Subcommittee on Intellectual Property and Judicial Administration where he and Congressman Robert Kastenmeier developed much of the current intellectual property law in America and made substantial improvements in our Federal courts and prisons. For the past two years, he has been Director of the National Commission on Judicial Discipline and Removal. You may add to all of the above the fact that Mike is fluent in French.

The fact that Mike joins us is consistent with our pledge to bring to our clients quality representation before the courts, the Congress, and Federal administrative agencies.

Leonard, Ralston, Stanton & Danks


Jerris Leonard

JL/kma