



I. Who We Are

Democracy Restored is a nonpartisan organization that exists to educate the public about how its government really works. We work to expose the actions of people that may be influencing policy against the wishes the American people have expressed through their elected representatives. We are dedicated to protecting the principles of representative democracy by addressing this influence in our government.

II. Introduction

This complaint is submitted for the formal review of the conduct of Hillary Rodham Clinton, Esq., a licensed attorney in the State of Arkansas,¹ in connection with her actions during the 2016 presidential campaign. The facts presented herein raise serious concerns under the Arkansas Rules of Professional Conduct, specifically involving Rules 8.4(c) (Dishonesty) and 8.4(d) (Prejudice to the Administration of Justice).

On July 31, 2025, new information in the ever-growing story about Clinton's involvement in the "Russia Collusion" hoax was released by the United States Senate Judiciary Committee.² Within this release, there is an annex, which suggests that Clinton approved a plan created by one of her advisors to release false information with the purpose "to smear" her political opponent during a presidential campaign and distract from the news surrounding her own legal

¹ Hillary D. Rodham Clinton, of Chappaqua, New York, was admitted to practice law in Arkansas on October 18, 1973. She was suspended on March 14, 2002 for CLE's, but was reinstated on March 4, 2019. As of the date of this Complaint, she is listed as "active" by the Arkansas judiciary. Arkansas Judiciary, *Attorney Search Detail: Hillary D. Rodham Clinton*, Accessed August 7, 2025, https://attorneyinfo.aoc.arkansas.gov/info/attorney/Attorney_Search_Detail.aspx?ID=6b117de4-d562-4e17-adc8-104aabe831d2.

² U.S. Senate Committee on the Judiciary, "Newly Declassified Appendix to Durham Report Sheds Additional Light on Clinton Campaign Plan to Falsely Tie Trump to Russia and the FBI's Failure to Investigate," Press Release, July 31, 2025, <https://www.judiciary.senate.gov/press/rep/releases/newly-declassified-appendix-to-durham-report-sheds-additional-light-on-clinton-campaign-plan-to-falsely-tie-trump-to-russia-and-fbis-failure-to-investigate>.



accusations. This revelation demands an already overdue inquiry into Clinton's fitness as a member of the Arkansas Bar.

The factual and evidentiary record, supported by the existence of multiple government investigations, indicates that Clinton likely engaged in, facilitated, or approved the dissemination of politically motivated and unverified allegations that triggered federal investigations, surveillance warrants, and media disinformation campaigns against her political opponent, Donald J. Trump, and his team, which recently led Attorney General Pam Bondi to order grand jury hearings.³

III. Factual Background

In April 2016, the Hillary for America campaign and the Democratic National Committee (DNC) retained Perkins Coie LLP, a prominent law firm, to handle legal and strategic matters.⁴ At the direction of Marc Elias, the campaign's general counsel, Perkins Coie engaged Fusion GPS, an opposition research firm, to develop negative intelligence on then-candidate Donald Trump.⁵ Fusion GPS, in turn, hired Christopher Steele, a former British intelligence officer, who compiled a series of memoranda now collectively known as the Steele Dossier.⁶

These memos were filled with "unvetted and unverified" information.⁷ They alleged collusion between Trump and Russian officials.⁸ But this information, ironically enough, was compiled by a Russian national, Igor Danchenko.⁹ Steele's reporting "did not have good insight into how many degrees of separation existed between the

³ Sheerin, Jude, "US attorney general orders grand jury hearings on Trump-Russia probe," BBC News, Aug. 6, 2025, <https://www.bbc.com/news/articles/c206dv2ekdeo>.

⁴ U.S. Department of Justice, Office of the Inspector General, *Review of Four FISA Applications and Other Aspects of the FBI's Crossfire Hurricane Investigation*, December 9, 2019, 104, <https://oig.justice.gov/sites/default/files/reports/120919-examination.pdf>. ("DOJ IG Report").

⁵ U.S. Department of Justice, *Statement of John H. Durham, United States Attorney for the District of Connecticut, Before the Senate Committee on the Judiciary*, August 12, 2020, 95, <https://www.justice.gov/archives/media/1381211/dl>. ("Durham Report").

⁶ *Ibid.* 11-12.

⁷ *Ibid.* 12.

⁸ *Ibid.* 10, 18.

⁹ *Ibid.* 13.



primary-Sub source's [Danchenko] sub-sources and the persons quoted in the reporting, and that it could have been multiple layers of hearsay upon hearsay.”¹⁰

The Clinton campaign fed this information to the FBI, media, and others in Washington, D.C.¹¹ Eventually, these “unvetted and unverified Steele Reports were used to support probable cause in the FBI’s FISA applications targeting” an advisor to President Trump as a part of an investigation called “Crossfire Hurricane.”¹² It was treated as legitimate intelligence, despite lacking corroboration.

These unverified and false allegations became so synonymous with Hillary Clinton that Special Counsel John Durham called the intelligence the “Clinton Plan intelligence,” because it had “approval by Hillary Clinton on July 26, 2016....to vilify Donald Trump by stirring up a scandal claiming interference by the Russian security services.”¹³ He found this notable because he stated that “the Clinton campaign w[as] seeking in 2016 to promote a false or exaggerated narrative to the public and to U.S. government agencies about Trump’s possible ties to Russia” and that this caused U.S. officials to rely on this information in making “critical decisions in the Crossfire Hurricane case and in related law enforcement and intelligence efforts.”¹⁴

Clinton herself amplified key claims stemming from her campaign’s opposition research. For example, on October 31, 2016, she tweeted: “Computer scientists have apparently uncovered a covert server linking the Trump Organization to a Russian-based bank,” while linking to a campaign statement.¹⁵ That statement made direct allegations about Trump, alleging that he was “covertly communicating with Russia” and saying there was a “direct link...between Donald Trump and Moscow.”¹⁶ It also floated what was to eventually come to pass: “We can only

¹⁰ DOJ IG Report 188.

¹¹ Durham Report 12.

¹² Ibid.

¹³ Ibid. 81.

¹⁴ Ibid. 82.

¹⁵ Clinton, Hillary (@HillaryClinton), “It’s time for Trump to answer serious questions about his ties to Russia,” X (formerly Twitter), November 1, 2016, 3:22 p.m., <https://x.com/HillaryClinton/status/793250312119263233>.

¹⁶ Ibid.



assume that federal authorities will now explore this direct connection between Trump and Russia....”¹⁷

A critical detail documented in the Durham Report is that then-CIA Director John Brennan briefed President Obama and senior officials on July 28, 2016, regarding intelligence, indicating that Clinton had purportedly approved of the plan in order to “to vilify Donald Trump by stirring up a scandal claiming interference by the Russian security services.”¹⁸ The reports were with “alleged approval by Hillary Clinton.”¹⁹

The plan also garnered significant media attention. This was by design for Clinton’s campaign team.²⁰ Steele, Fusion GPS, etc. also actively worked to get the media involved.²¹

Eventually, the Federal Election Commission (FEC) fined both the Clinton campaign and the Democratic National Committee for falsely reporting election spending. The FEC concluded that the expenditures were identified as “legal services” and “legal and compliance consulting” rather than disclosing it as opposition research.²²

On July 31, 2025, Senator Chuck Grassley released an annex to the Durham Report that shed more light on Clinton’s involvement. The previously classified annex cited a memorandum that indicated, “Clinton approved a plan proposed by one of her foreign policy advisors...[to] smear Donald Trump by magnifying the scandal tied to the intrusion by the Russian special services in the pre-election process to benefit the Republican candidate.”²³ The strategy was to elevate the scandal to such a

¹⁷ Ibid.

¹⁸ Durham Report 81.

¹⁹ Ibid.

²⁰ See e.g. Hillary for America, *Hillary for America Statement on Bombshell Report About Trump Aides’ Ties to Russia*, Press Release, February 14, 2017, The American Presidency Project, <https://www.presidency.ucsb.edu/documents/hillary-clinton-campaign-press-release-hillary-for-america-statement-bombshell-report>.

²¹ DOJ IG Report 103-117; Durham Report 98.

²² Polantz, Katelyn, and Tierney Sneed, “Clinton Campaign and DNC Fined by FEC for Misreporting Spending on Steele Dossier,” CNN, March 30, 2022, <https://www.cnn.com/2022/03/30/politics/clinton-dnc-steele-dossier-fusion-gps>.

²³ U.S. Senate Committee on the Judiciary, *Declassified Durham Annex Released by Chairman Grassley*, Senator Chuck Grassley, accessed August 7, 2025,



degree that it would divert “attention from the investigation of Clinton’s compromised electronic correspondence.”²⁴

To summarize, Hillary Clinton, or at least her campaign, funded and then elevated unverified, unvetted, and false information to injure a political opponent. Records recently released indicate that she apparently personally signed off on an effort to amplify this bad intelligence to the media and federal law enforcement. As the Senate Committee on the Judiciary alluded, she apparently did so to cover up allegations of her own corruption and to injure her political opponent, Donald Trump. In doing so, she caused the federal government to surveil innocent Americans, including Trump and his close associates. This not only caused injustices toward innocent people, but also caused federal law enforcement to divert significant resources toward falsities.

IV. Arkansas Rules of Professional Conduct

Rule 8.4 of the Arkansas Rules of Professional Conduct states as follows:

It is professional misconduct for a lawyer to:

(c) engage in conduct involving dishonesty, fraud, deceit, or misrepresentation;

(d) engage in conduct that is prejudicial to the administration of justice.

Additionally, comment [5] states as follows:

Lawyers holding public office assume legal responsibilities going beyond those of other citizens. A lawyer’s abuse of public office can suggest an inability to fulfill the professional role of lawyers.

https://www.grassley.senate.gov/imo/media/doc/declassified_durham_annex_released_by_chairman_grassley.pdf.

²⁴ Ibid.



V. Analysis

The facts above lead one to conclude that Hillary Clinton's actions involved dishonesty, deceit, and misrepresentation. She and/or her campaign greenlit opposition research based upon unverified sources and approved its release knowing that it was unverified, unvetted, and untrue. She and her campaign then promoted the information to the public and through the media and suggested that federal law enforcement open an investigation, which the FBI subsequently did. She never took any steps to mitigate these lies or correct them. And they were done with the purpose of distracting from her own legal concerns which had created public scrutiny against her.

Her actions were also prejudicial to the administration of justice. Indeed, it would be difficult to find a better example. She created intelligence, knowing of its falsity (or at the very least knowing of its unreliability). This false information found its way to federal law enforcement. She publicly promoted campaign materials that stated that federal law enforcement should investigate then-candidate Trump and those who worked alongside him. That faulty intelligence then led to federal investigations and warrants to surveil innocent Americans.

These actions are made all the worse given Clinton's lot. As a former Senator, former Secretary of State, and candidate for the President of the United States, her responsibilities went beyond the average citizen, per Comment [5] to Rule 8.4 to the Arkansas Rules of Professional Conduct. Few people have elevated to higher positions of public office than Clinton. And, when given that trust, Clinton violated that trust in profoundly dangerous ways. The Arkansas Bar requires a higher standard of conduct from its members.

VI. Conclusion and Request for Investigation

The record shows that Hillary Clinton's campaign, under her leadership and through legal counsel, generated and promoted false claims with significant consequences. These claims led to years of investigations, millions in taxpayer expense, and an erosion of public trust in both elections and legal institutions.

While no criminal convictions have been secured, recently released records have again increased the prospect of a federal investigation into her conduct. Regardless, the legal profession holds its members to higher standards. I respectfully request



that the Arkansas Supreme Court Office of Professional Conduct open an inquiry into this matter, and if warranted, issue disciplinary sanctions to uphold the integrity of the legal profession.

Sincerely,

Houston Keene
Director
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