

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

PATRICIA SMITH,
San Diego, California

and

CHARLES WOODS,
Portland, Oregon

Plaintiffs,

v.

HILLARY RODHAM CLINTON,
3067 Whitehaven St. NW
Washington, D.C., 20008

Defendant.

Case No: 1:16-cv-01606

COMPLAINT

I. INTRODUCTION.

Plaintiffs Patricia (hereafter “Pat Smith”) Smith and Charles Woods are the parents of Sean Smith and Tyrone Woods, respectively, each of whom were killed by Islamic terrorists during the attack on the American consulate in Benghazi, Libya on September 11, 2012. Hillary Rodham Clinton (“Defendant Clinton”), who was the U.S. Secretary of State at the time, has since been found to have used a private e-mail server to send and receive confidential and classified government information, often concerning matters of national security, during her tenure. In fact, Director of the Federal Bureau of Investigation (“FBI”), James Comey, publicly stated that Defendant Clinton, at a minimum, was “extremely careless” in handling confidential and classified government information and “there is evidence of potential violations of the statutes regarding the handling of classified information.”

It is highly probable, given Defendant Clinton’s history of reckless handling of classified information, that Defendant Clinton, as Secretary of State, sent and received information about

Ambassador Christopher Stevens and thus the U.S. Department of State activities and covert operations that the deceased were a part of in Benghazi, Libya. This information was compromised from the second that it left Defendant Clinton's private e-mail server and easily found its way to foreign powers including, but not limited to Russia, Iran, China, and North Korea. As a direct result of Defendant Clinton's reckless handling of this classified, sensitive information, Islamic terrorists were able to obtain the whereabouts of Ambassador Christopher Stevens and thus the U.S. State Department and covert and other government operations in Benghazi, Libya and subsequently orchestrate, plan, and execute the now infamous September 11, 2012 attack.¹ From the illegal use of Defendant Clinton's private email server, it was reasonably foreseeable that Islamic terrorists would premeditatedly kill Plaintiffs' sons.

Immediately after the attack, Defendant Clinton, in an effort to save the re-election chances of President Barack Obama, and in turn, her own chances at the 2016 Presidency, lied to Plaintiffs and the public at large that the Benghazi Attacks were caused by Islamic reaction over an anti-Muslim YouTube video that had been posted on the internet. These lies were perpetrated despite the fact that she knew immediately that this video was actually not the cause of the attack—information that she shared with the Prime Minister of Egypt and her own daughter, Chelsea Clinton, but hid from Plaintiffs and the public at large. Defendant Clinton even promised Plaintiffs that the person responsible for the video would be arrested. Plaintiff Woods recorded the conversation with Defendant Clinton contemporaneously in his diary, which he has recorded in for many years. Now, Defendant Clinton, in an attempt to save her reputation and intimidate Plaintiffs and their surviving family members into silence as she attempts to be elected President in the November, 2016 election, has gone on a defamatory smear campaign to paint Plaintiffs as

¹Aaron Klein, *Hillary Emails Betrayed Whereabouts of Murdered Ambassador Chris Stevens*, (March 1, 2016) available at: <http://www.breitbart.com/national-security/2016/03/01/hillary-emails-betrayed-whereabouts-of-murdered-ambassador-chris-stevens/>

liars in the public eye in order to discredit Plaintiffs, who have been vocal about Defendant Clinton's pattern and practice of dishonesty regarding what caused the Benghazi attack, its aftermath, and the death of their sons.

II. JURISDICTION AND VENUE.

1. This Court has subject matter jurisdiction over this case pursuant to 28 U.S.C. § 1332 because each Plaintiff and the Defendant are citizens of different states and the amount in controversy exceeds \$75,000 (Diversity of Citizenship Jurisdiction).

2. This Court has supplemental jurisdiction over this case pursuant to 28 U.S.C. § 1367.

3. Venue is proper pursuant to 18 U.S.C. § 1965 and 28 U.S.C. § 1391(b)(2), (3) in that Defendant resides here and is subject to personal jurisdiction in this District.

III. PARTIES.

Plaintiffs

4. Pat Smith is an individual, natural person who, at all material times, was and is a citizen and resident of the state of California. She is the natural mother of Sean Smith, the American U.S. Foreign Service member and Information Programs Officer, U.S. Consulate General, U.S. Department of State who was killed during the September 11, 2012 Benghazi Attack.

5. Charles Woods is an individual, natural person who, at all material times, was and is a citizen and resident of the state of Oregon. He is the natural father of Tyrone Woods, the American Navy SEAL who was killed during the September 11, 2012 Benghazi Attack.

Defendant

6. Defendant Hillary Rodham Clinton is an individual, natural person who, at all material times, was and is a resident of the District of Columbia.

IV. STANDING.

7. Plaintiffs have standing to bring this action because they have been directly affected and victimized by the unlawful conduct complained herein. Their injuries are proximately related to the conduct of Defendant Hillary Rodham Clinton.

V. FACTS.

8. Defendant Hillary Rodham Clinton (“Defendant Clinton”) served as U.S. Secretary of State from 2009 until 2013.

9. During her tenure as Secretary of State, Defendant Clinton utilized a private e-mail server to conduct official government business, including but not limited to, sending and receiving thousands of e-mails regarding matters of national security, including information that has been categorized as “top secret”, “secret”, and “confidential”.²

10. After an investigation into Defendant Clinton’s private e-mail server, the Director of the FBI, James Comey, publicly declared that Defendant Clinton had, at a minimum, been “extremely careless” in handling confidential and classified government information and acknowledged that “there is evidence of potential violations of the statutes regarding the handling of classified information.”³

² Alicia Parlapiano, *What We Know About Hillary Clinton’s Private Email Server*, NEW YORK TIMES, (last updated July 13, 2016), available at: http://www.nytimes.com/interactive/2016/05/27/us/politics/what-we-know-about-hillary-clintons-private-email-server.html?_r=0

³ David Jackson, Kevin Johnson, “*Extremely Careless,*” but FBI advises no charges for Clinton’s emails, USA TODAY (July 5, 2016) available at: <http://www.usatoday.com/story/news/politics/elections/2016/07/05/james-comey-fbi-hillary-clinton/86702072/>

11. There still remain thousands of e-mails sent and received by Defendant Clinton using her private email server during her tenure as Secretary of State that have not been released.⁴

12. Defendant Clinton's own campaign spokesman, Jake Sullivan, has even acknowledged the national security implications of Defendant Clinton's private e-mail server when he, in an official press release discussing the e-mails, stated, "[t]his has gone from being a curiosity, and a matter of politics, to being a national security issue."⁵

13. Defendant Clinton's private e-mail server was, in fact, the subject of hacking from [Russia] Iran, China, South Korea, and Germany.⁶

14. Related to this, Defendant Clinton personally accused Russian intelligence services of hacking into Democratic National Committee computers concerning Defendant Clinton's presidential campaign, stating that, "We know that Russian intelligence services hacked into the DNC and we know that they arranged for a lot of those emails to be released and we know that Donald Trump has shown a very troubling willingness to back up Putin, to support Putin."⁷ Thus the Russians logically hacked Defendant Clinton's private email server as well.

15. During her tenure as Secretary of State, Defendant Clinton utilized her private e-mail server to send and receive information about the location of Ambassador Christopher Stevens and thus the U.S. Department of State and the covert Central Intelligence Agency

⁴ Parlapiano, *supra* note 1

⁵ Sean Davis, *Donald Trump Just Got Hillary Clinton to Admit Her E-Mails Are a 'National Security Issue'*, THE FEDERALIST, (July 27, 2016) available at: <http://thefederalist.com/2016/07/27/donald-trump-just-got-hillary-clinton-to-admit-her-e-mails-are-a-national-security-issue/>

⁶ Josh Gerstein, Rachael Bade, *Clinton server faced hacking from China, South Korea and Germany*, POLITICO, October 8, 2015, available at: <http://www.politico.com/story/2015/10/hillary-clinton-email-server-hacked-china-south-korea-germany-214546>

⁷ Aaron P. Bernstein, *Clinton says Russian intelligence services hacked DNC*, REUTERS, (August 1, 2016) available at: <http://www.reuters.com/article/us-usa-election-clinton-idUSKCN10B0IX>

(“CIA”) and other government operations in Benghazi, Libya. This information was intercepted by foreign powers, including but not limited to, Russia, Iran, China, and North Korea.

16. Islamic terrorists obtained the information sent and received by Defendant Clinton about the location of Ambassador Christopher Stevens and thus the U.S. Department of State and the covert CIA and other government operations in Benghazi and used it to plan, orchestrate, and carry out the horrific and devastating attack on the American diplomatic compound in Benghazi, Libya on September 11, 2012 (“Benghazi Attack”), resulting in the death of four Americans, including Sean Smith and Tyrone Woods.

17. The Benghazi Attack was a directly and proximately caused, at a minimum, by Defendant Clinton’s “extreme carelessness” in handling confidential and classified information, such as the location of Ambassador Christopher Stevens and thus the U.S. Department of State and the covert CIA and other government operations in Benghazi.

18. After the Benghazi Attack, Defendant Clinton attempted to blame an anti-Muslim YouTube video for inciting the Benghazi Attack. On September 11, 2012, Defendant Clinton stated in a Press Statement, “Some have sought to justify this vicious behavior as a response to inflammatory material posted on the Internet.”⁸ Again, on September 12, 2012, in a public speech, Defendant Clinton states, “Some have sought to justify this vicious behavior, along with the protest that took place at our Embassy in Cairo yesterday, as a response to inflammatory material posted on the internet.”⁹

19. On September 14, 2012, Defendant Clinton met privately with the family members of the four Americans who were killed during the Benghazi Attack, including Plaintiffs

⁸ Hillary Clinton, *Statement on the Attack in Benghazi*, U.S. Department of State, (September 11, 2012) available at: <http://www.state.gov/secretary/20092013clinton/rm/2012/09/197628.htm>

⁹ *Secretary Clinton Delivers Remarks on the Deaths of U.S. Personnel in Benghazi, Libya*, September 12, 2012, available at <https://blogs.state.gov/stories/2012/09/12/secretary-clinton-delivers-remarks-deaths-us-personnel-benghazi-libya>

Pat Smith and Charles Woods (“Woods”) at Joint Base Andrews in Maryland. During the private meeting, Defendant Clinton lied to Plaintiffs and told Plaintiffs that the Benghazi Attack was the result of the anti-Muslim YouTube video that had been posted online and that the creator of the video would be arrested.

20. Woods contemporaneously recorded this September 14, 2012 interaction with Defendant Clinton by writing in his diary, stating that “I gave Hillary a hug and shook her hand, and she said we are going to have the film maker arrested who was responsible for the death of my son.”

21. Indeed, Nakoula Basseley Nakoula was later prosecuted and jailed for making the anti-Muslim YouTube video that Defendant Clinton claimed caused the Benghazi Attack.¹⁰

22. Since the conclusion of her tenure as Secretary of State, Defendant Clinton has formally announced her long-planned and orchestrated candidacy for President of the United States of America in the November, 2016 election and has now successfully secured the nomination of the Democratic party.

23. During her campaign for President, Defendant Clinton has negligently, recklessly, and/or maliciously defamed Plaintiffs by either directly calling them liars, or by strongly implying that they are liars, in order to protect and enhance her public image and intimidate and emotionally harm and silence them to not speak up about the Benghazi attack on at least four separate occasions. These occasions include, but are not limited to:

(a) **December 6, 2015** – *Interview with ABC’s George Stephanopoulos* –

Defendant Clinton flat out falsely denied telling the families of Benghazi victims that the YouTube video caused the attack. After George

¹⁰ Rico Lowry, *The Benghazi Patsy*, POLITICO, (May 9, 2013), available at: <http://www.politico.com/story/2013/05/the-benghazi-patsy-091101>

Stephanopoulos asked Defendant Clinton, “Did you tell them it was about the film?”, Defendant Clinton responded, “No. You know, look I understand the continuing grief at the loss that parents experienced with the loss of these four brave Americans. And I did testify, as you know, for 11 hours. And I answered all of these questions. Now, I can't -- I can't help it the people think there has to be something else there. I said very clearly there had been a terrorist group, uh, that had taken responsibility on Facebook, um, between the time that, uh, I – you know, when I talked to my daughter, that was the latest information; we were, uh, giving it credibility. And then we learned the next day it wasn't true. In fact, they retracted it. This was a fast-moving series of events in the fog of war and I think most Americans understand that.”¹¹

(b) **December 30, 2015** – *Conway Daily Sun Editorial Board Meeting* –

Defendant Clinton directly branded Plaintiffs as liars. After Conway Daily Sun columnist Tom McLaughlin pointed out discrepancies in Defendant Clinton's private and public comments about the cause of the Benghazi Attack, and referenced Defendant Clinton's interview with George Stephanopoulos where Defendant Clinton denies telling Plaintiffs that the Benghazi Attacks were caused by the YouTube video, McLaughlin asks, “Somebody is lying. Who is it?”. Clinton responds, “Not me, that's all I can tell you.”¹²

¹¹ Guy Benson, *Hillary: No, I didn't Blame the Video in My Meeting With Benghazi Families*, TOWNHALL, (December 8, 2015) available at: <http://townhall.com/tipsheet/guybenson/2015/12/08/whoa-hillary-says--benghazi-families-are-wrong-she-didnt-blame-attacks-on-internet-video--n2090274>

¹² Daymond Steer, *Clinton Talks Iraq and Benghazi with the Sun Ed Board*, CONWAY DAILY SUN, (December 30, 2015) available at: <http://www.conwaydailysun.com/newsx/local-news/123956-clinton-talks-iraq-and-benghazi-with-the-sun-ed-board>

(c) **March 9, 2016** – *Democratic Presidential Debate* – When asked about Plaintiff Smith’s allegation that Defendant Clinton lied to her by blaming the Benghazi Attack on the YouTube video, Defendant Clinton responded by saying, “I feel a great deal of sympathy for the families of the four brave Americans that we lost at Benghazi, and I certainly can’t even imagine the grief that she has for losing her son, but she’s wrong. She’s absolutely wrong.”¹³

(d) **July 31, 2016** – *Interview with Chris Wallace of Fox News Sunday* – Defendant Clinton stated, “Chris, my heart goes out to both of them. Losing a child under any circumstances, especially in this case, two State Department employees, extraordinary men both of them, two CIA contractors gave their lives protecting our country, our values. I understand the grief and the incredible sense of loss that can motivate that. As other members of families who lost loved ones have said, that’s not what they heard, I don’t hold any ill feeling for someone who in that moment may not fully recall everything that was or wasn’t said.”¹⁴

24. In fact, Defendant Clinton knew from the very beginning that the Benghazi Attack was not caused by the YouTube video, but was rather a planned, premeditated terrorist attack. On the night of the Benghazi Attack, Defendant Clinton sent an e-mail to her daughter,

¹³ Bre Payton, *Watch Hillary Clinton Call the Mother of a Benghazi Victim a Liar*, THE FEDERALIST (March 10, 2016) available at: <http://thefederalist.com/2016/03/10/watch-hillary-clinton-call-the-mother-of-a-benghazi-victim-a-liar/>

¹⁴ Tommy Christopher, *Chris Wallace Grills Hillary Clinton About Benghazi parents’ Claims She Blamed Video*, MEDIAITE, (July 31, 2016) available at: <http://www.mediaite.com/tv/fox-news-chris-wallace-grills-hillary-clinton-about-benghazi-parents-claims-she-blamed-video/>

Chelsea Clinton, where she clearly blames the attack on an “Al-Qaeda-like group”.¹⁵ In another email the day after the Benghazi Attack, Defendant Clinton directly told the Egyptian Prime Minister “we know the attack in Libya had nothing to do with the film. It was a planned attack, not a protest.”¹⁶

FIRST CAUSE OF ACTION
(Wrongful Death)

25. Plaintiffs reallege paragraphs 1 to 24, and incorporate herein by reference each and every foregoing paragraph of this Complaint as if set forth in full.

26. The deaths of Sean Smith and Tyrone Woods were directly and proximately caused by the negligent and reckless actions of Defendant Clinton, who used a private email server to send and receive secret, confidential and classified government information that compromised the location of Ambassador Christopher Stevens and thus the U.S. Department of State and the covert CIA and other government operations in Benghazi, Libya that both Sean Smith and Tyrone Woods were a part of.

27. Using the information that was obtained from Defendant Clinton’s “extremely careless” handling of confidential and classified government information, Islamic terrorists were able to locate Ambassador Christopher Stevens, Sean Smith and Tyrone Woods, and subsequently orchestrate, plan, and execute the Benghazi Attack that claimed the lives of Sean Smith and Tyrone Woods.

¹⁵ Peter Nicholas, *Hillary Clinton’s Email to Chelsea Stars in Benghazi Hearing*, THE WALL STREET JOURNAL, (October 22, 2015) available at: <http://blogs.wsj.com/washwire/2015/10/22/hillary-clintons-email-to-chelsea-stars-in-benghazi-hearing/>

¹⁶ *These 3 Emails Show What Hillary Was Really Saying About Benghazi*, FOX NEWS, (October 23, 2015) available at <http://insider.foxnews.com/2015/10/23/hillary-clinton-emails-chelsea-during-benghazi-attack-blames-al-qaeda>

28. Without having access to the compromised information that was obtained due to Defendant Clinton's "extremely careless" handling of confidential information, the Islamic terrorist perpetrators of the Benghazi Attack would not have been able to carry out the attack due to lack of information.

29. As a result of the deaths of Sean Smith and Tyrone Woods, Plaintiffs have suffered pecuniary and other loss equaling the financial support the deceased would have been expected to provide, in addition to loss of services, mental anguish, and pain and suffering.

30. Plaintiff Patricia Smith is the mother of the deceased Sean Smith and is thereby entitled to bring this action.

31. Plaintiff Charles Woods is the father of the deceased Tyrone Woods and is thereby entitled to bring this action.

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment against Defendant for actual, compensatory damages and punitive damages in a sum to be determined by a jury, for costs herein incurred, for attorneys' fees, and for such other and further relief as this Court deems just and proper.

SECOND CAUSE OF ACTION
Defamation

32. Plaintiffs reallege paragraphs 1-31, and incorporate herein by reference each and every foregoing paragraph of this Complaint as if set forth in full.

33. Defendant Clinton made false and defamatory statements negligently, recklessly, purposefully, and/or intentionally with actual malice as set forth in paragraphs 23(a), (b), (c), and (d) concerning Plaintiffs by stating that Plaintiffs were lying about Clinton having told them that the Benghazi Attack was caused by an anti-Muslim YouTube video.

34. Defendant Clinton, in fact, knew that her statements concerning Plaintiffs were false and misleading, as evidenced by her public comments after the Benghazi Attacks and her private e-mails to her daughter and the Prime Minister of Egypt.

35. Defendant Clinton's statements were all published and made in public, and subsequently published and disseminated through various media outlets to persons and entities in the District of Columbia, all over the United States, and across the world, and were understood to be of or concerning Plaintiffs.

36. Defendant Clinton's statements were not subject to any privilege.

37. As a direct and proximate result of Defendant Clinton's statements, Plaintiffs have suffered pecuniary damage, as well as injury to reputation, impairment to standing in their community, personal humiliation, pain and suffering, and emotional distress.

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment against Defendant for actual, compensatory damages and punitive damages, in a sum to be determined by a jury, for costs herein incurred, for attorneys' fees, and for such other and further relief as this Court deems just and proper.

THIRD CAUSE OF ACTION
False Light

38. Plaintiffs reallege paragraphs 1-37, and incorporate herein by reference each and every foregoing paragraph of this Complaint as if set forth in full.

39. Defendant Clinton knowingly made false statements, representations, or imputations about Plaintiffs by stating that Plaintiffs were lying about Defendant Clinton having told them that the Benghazi Attack was caused by an anti-Muslim YouTube video, as set forth in paragraphs 23(a), (b), (c), and (d), above.

40. Defendant Clinton's statements were all made in public, and were foreseeably published and disseminated through various media outlets to persons and entities in the District of Columbia, all over the United States, and across the world, and were reasonably understood to be of or concerning Plaintiffs.

41. Defendant Clinton's statements about Plaintiffs, referring to them as liars and questioning their honesty, placed Plaintiffs in a false light that would be offensive to a reasonable person.

42. As a direct and proximate result of Defendant Clinton's statements, Plaintiffs have suffered pecuniary damage, as well as injury to reputation, impairment to standing in the community, personal humiliation, pain and suffering, and emotional distress.

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment against Defendant for pecuniary, actual, compensatory damages and punitive damages, in a sum to be determined by a jury, for costs herein incurred, for attorneys' fees, and for such other and further relief as this Court deems just and proper.

FOURTH CAUSE OF ACTION
Negligence

43. Plaintiffs reallege paragraphs 1 to 42, and incorporate herein by reference each and every foregoing paragraph of this Complaint as if set forth in full.

44. Defendant Clinton owed Plaintiffs, as parents of the deceased, a duty to not act, at a minimum, "extremely carelessly" in the handling of confidential and classified government information via her personal email server and compromise the location of Ambassador Christopher Stevens and thus the U.S. Department of State and the covert and other government operations in Benghazi, Libya that the deceased were a part of.

45. Defendant Clinton breached her duty by sending and receiving information on her private e-mail server about the location of Ambassador Christopher Stevens and thus the U.S. State Department and the covert and other government operations in Benghazi, Libya that the deceased were a part of that was intercepted and subsequently used by Islamic terrorists to plan, orchestrate, and execute the Benghazi Attack.

46. The deaths of Sean Smith and Tyrone Woods were directly and proximately caused by the negligent and reckless handling of confidential and classified government information by Defendant Clinton, in that Defendant Clinton compromised the location of Ambassador Christopher Stevens and thus the U.S. Department of State and the covert and other government operations in Benghazi, Libya that the deceased were a part of.

47. But-for Defendant Clinton's negligent and reckless handling of confidential and classified government information by Defendant Clinton, in that Defendant Clinton compromised the location of Ambassador Christopher Stevens and thus the U.S. State Department and the covert and other government operations in Benghazi, Libya that the deceased were a part of, the Islamic terrorists who carried out the attack would not have been able to do so due to lack of information.

48. As a direct and proximate result of Defendant Clinton's statements, Plaintiffs have suffered pecuniary damage, pain and suffering, and emotional distress.

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment against Defendant for pecuniary, actual, compensatory and punitive damages, in a sum to be determined by a jury, for costs herein incurred, for attorneys' fees, and for such other and further relief as this Court deems just and proper.

FIFTH CAUSE OF ACTION
Intentional Infliction of Emotional Distress

49. Plaintiffs reallege paragraphs 1 to 48, and incorporate herein by reference each and every foregoing paragraph of this Complaint as if set forth in full.

50. Defendant Clinton engaged in extreme and outrageous conduct by using her private e-mail server to send and receive confidential and classified government information, often concerning matters of national security, including the location of Ambassador Christopher Stevens and thus the U.S. State Department and the covert and other government operations in Benghazi, Libya that the deceased were a part of.

51. Defendant Clinton intentionally and knowingly used her private e-mail server to send and receive confidential and classified government information, including, on information and belief, the location of Ambassador Christopher Stevens and thus the U.S. State Department and the covert and other government operations in Benghazi, Libya that the deceased were a part of, as well as defaming and holding in a false light Plaintiffs.

52. Defendant Clinton's extreme and outrageous conduct, on information and belief, directly caused Plaintiffs severe emotional distress stemming from the death of Plaintiffs' sons Sean Smith and Tyrone Woods.

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment against Defendant for actual, compensatory damages and punitive damages, in a sum to be determined by a jury, for costs herein incurred, for attorneys' fees, and for such other and further relief as this Court deems just and proper.

SIXTH CAUSE OF ACTION
Negligent Infliction of Emotional Distress

53. Plaintiffs reallege paragraphs 1 to 52, and incorporate herein by reference each and every foregoing paragraph of this Complaint as if set forth in full.

54. Defendant Clinton, as Secretary of State, had a relationship with Plaintiffs, who were the parents of deceased Americans taking part in the U.S. Department of State and the covert CIA operations in Benghazi, that necessarily implicated Plaintiffs' emotional well-being in that Clinton was, as Secretary of State, ultimately responsible for the safety of Tyrone Woods and Sean Smith

55. There existed an especially probable and likely risk that Defendant Clinton's negligent and reckless handling of confidential and classified government information relating to matters of national security, including and not limited to the location Ambassador Christopher Stevens and thus the U.S. State Department and the covert operations that the deceased were part of, would compromise the safety of Tyrone Woods and Sean Smith, and therefore Plaintiffs' emotional well-being.

56. As a direct and proximate result of Defendant Clinton's negligent and reckless handling of confidential information relating to matters of national security, including and not limited to the location of the covert and other government operations that the deceased were part of, Tyrone Woods and Sean Smith were killed, as well as defaming and holding Plaintiffs in a false light, thereby causing serious emotional distress to Plaintiffs.

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment against Defendant for damages including actual, compensatory and punitive damages in a sum to be determined by a jury, for costs herein incurred, for attorneys' fees, and for such other and further relief as this Court deems just and proper.

VI. PRAYER FOR RELIEF.

WHEREFORE, Plaintiffs pray for relief and judgment against Defendant Clinton as follows:

(a) For general (non-economic), special (economic), actual, compensatory and punitive damages to be determined by a jury.

DEMAND FOR JURY TRIAL

Plaintiffs demand a trial by jury on all counts as to all issues so triable.

Dated: August 8, 2016

Respectfully submitted,

/s/ Larry Klayman

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