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Billy Ray Dale

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United States Court of Appeals  
For the District of Columbia Circuit

**FILED SEP 28 2000**

**Special Division**

**UNDER SEAL**

September 27, 2000

The Honorable Mark J. Langer  
Clerk, United States Court of Appeals for the  
District of Columbia Circuit  
333 Constitution Ave., N.W.  
Washington, D.C. 20001

**Re: Billy Ray Dale**

Dear Mr. Langer:

Mr. Billy Ray Dale, by counsel and pursuant to 28 U.S.C. § 594(h)(2), respectfully submits the following comments and factual information regarding the Final Report of the Independent Counsel (In Re: Madison Guaranty Savings & Loan Association), In Re: William David Watkins and In Re: Hillary Rodham Clinton dated June 22, 2000 ("OIC Report").

In general, the report goes to great lengths to exonerate Mr. Watkins and Mrs. Clinton despite the overwhelming evidence of their wrongdoing, while failing to once and for all lay to rest the unfounded allegations against Mr. Dale despite the fact that the allegations were clearly false and fabricated by individuals who were actively seeking to have Mr. Dale removed so that they could take his job.

After almost 32 years of employment in the White House Travel Office working for seven presidents before Bill Clinton, and a total of 38 years of excellent service, Mr. Dale had received a number of awards from such organizations as the U.S. Secret Service and commercial airline companies. He also had numerous letters of commendation and appreciation from past White House staff and other government agency employees and business associates from around the world. The majority of these were left behind in The White House when he was illegally fired on May 19, 1993

This meant that these individuals had to come up with some other reason for removing Mr. Dale. The false allegations began when Martens responded to Mr. Dale declining his offer of help by sending a memorandum to Harry Thomason accusing Mr. Dale of failing to require Airline of the Americas to charge back costs to the press corps and by telling Mr. Thomason in person that Mr. Dale was accepting kickbacks. OIC report p. 66. As the report notes, these allegations were completely baseless and "erroneous." OIC report at p. 79. Based on Mr. Martens' actions, Mr. Thomason then spread these allegations throughout The White House. Based on Mr. Thomason's spreading of these false allegations, Mr. Watkins placed Ms. Cornelius in the Travel Office so that she could begin spying for him and copying records behind Mr. Dale's back. Based on her self-interest, the conclusions she arrived at from hearing the allegations that Mr. Thomason had spread, and her review of only part of the Travel Office records, she also began to make false accusations concerning Mr. Dale's handling of the petty cash in the Travel Office. It was these false allegations that in turn lead to the FBI investigation and criminal charges. Through this sad chain of events, false accusations were allowed to blemish an otherwise spotless career of dedicated service to the President. Fortunately in the end, Mr. Dale was acquitted, but the damage that was done cannot be repaired.

Not only did Ms Cornelius initiate many of the baseless accusations, she also made it impossible for Mr. Dale to refute the charges because she had stolen the records that he needed for his defense. In conducting her spying campaign, Ms. Cornelius was removing records from the Travel Office and taking them home. When she was confronted about this, she lied to Mr. Dale's assistant and denied having the records. As the report notes, she actually had records which she kept at the apartment she shared with Ms. Clarissa Cerda. OIC Report at p. 77. It is these "missing records" that lead to the trial of Mr. Dale.

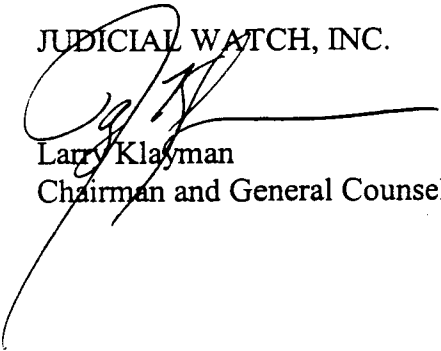
In short, it is unfortunate that this report which goes to such great lengths to exonerate Mr. Watkins and Mrs. Clinton, did not forthrightly set forth the facts concerning Mr. Dale's innocence. This is especially sad since the report notes that there was overwhelming evidence against Mr. Watkins and Mrs. Clinton and that they (and other senior staff in the White House) had been uncooperative in the investigation by withholding pertinent information and documents as well as asserting unfounded privileges. Compared to this, the report confirms Mr. Dale's stellar service record, confirms that the allegations against Mr. Dale were fabricated by people who wanted his job, confirms that he was acquitted after a trial that lasted several weeks, and that the "financial irregularities" of inadequate records for petty cash were the product of Ms. Cornelius' stealing Travel Office records rather than any wrongdoing on Mr. Dale's part.

In short, all of the evidence it sets out it proclaims that it "fully and completely discharges [Billy Ray Dale] from all criminal liability." The Office of Independent Counsel should have noted this as clearly and as often as it did for Mr. Watkins and Mrs. Clinton.

It is ironic and tragic, however, that while the Independent Counsel has stated that he needed proof beyond a reasonable doubt before indicting Mr. and Mrs. Clinton of various alleged crimes, that Mr. Dale, our client, was indicted by a corrupt Clinton-Gore Justice Department without any probative evidence of wrongdoing. It is regrettable that the Independent Counsel has failed to seek redress for this injustice, and as a result his report is suspect.

Respectfully Submitted,

JUDICIAL WATCH, INC.



Larry Klayman  
Chairman and General Counsel