

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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PETER P. STRZOK,

Plaintiff,

v.

ATTORNEY GENERAL MERRICK B.  
GARLAND, in his official capacity, et al.,

Defendants.

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Civil Action No. 19-2367 (ABJ)

LISA PAGE,

Plaintiff,

v.

U.S. DEPARTMENT OF JUSTICE, *et al.*,

Defendants.

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Civil Action No. 19-3675 (TSC)

ATTORNEY GENERAL MERRICK  
GARLAND, in his official capacity, UNITED  
STATES DEPARTMENT OF JUSTICE, FBI  
DIRECTOR CHRISTOPHER A. WRAY, in his  
official capacity, FEDERAL BUREAU OF  
INVESTIGATION,

Movants,

v.

PETER P. STRZOK

IN RE SUBPOENA SERVED ON  
DONALD J. TRUMP

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Case No.: 1:22-mc-27 (ABJ)

**DECLARATION OF CHRISTOPHER M. LYNCH IN SUPPORT OF DEFENDANTS'**  
**SUPPLEMENTAL FILING IN SUPPORT OF MOTIONS TO QUASH SUBPOENAS**  
**AND FOR PROTECTIVE ORDER**

I, Christopher M. Lynch, make the following Declaration pursuant to 28 U.S.C. § 1746, and state that under penalty of perjury the following is true and correct to the best of my knowledge and belief:

1. I am a Trial Attorney with the Federal Programs Branch of the Civil Division of the United States Department of Justice and counsel for Defendants in this matter.

2. Attached as Exhibit A is a true and correct copy of Exhibit 5 to the Deposition of David Bowdich, redacted to remove Mr. Strzok's address.

3. Attached as Exhibit B is a true and correct copy of Exhibit 53 to the deposition of David Bowdich, redacted to remove certain personal information of non-government individuals.

Executed this 29th day of September, 2022.

/s/ Christopher M. Lynch  
Christopher M. Lynch

## Exhibit A

**From:** WOOD, MELISSA ANN (DO) (FBI)  
**Subject:** letter --- UNCLASSIFIED  
**To:** WILL, CANDICE M. (OPR) (FBI)  
**Sent:** August 8, 2018 8:23 AM (UTC-04:00)  
**Attached:** STRZOKLETTER.docx

Classification: UNCLASSIFIED  
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Candice,

Can you take a look at this and see what you think. Dave has the AG this morning but would like to talk to you about it when he returns. Thanks, Missy

=====  
Classification: UNCLASSIFIED

**Exhibit**  
**5**

August 8, 2018

Mr. Peter Strzok  
[REDACTED]

Dear Mr. Strzok,

I have reviewed the decision of Assistant Director (AD), Office of Professional Responsibility (OPR) following your appeal which proposed a 60 day suspension and demotion. I reviewed the relevant material to include the AD's letter proposing you for dismissal and many of the text messages between you and Lisa Page. I considered the Douglas Factors drafted by the AD of the Counterintelligence Division, your role as one of the most senior counterintelligence agents in the FBI, and finally I considered the long term damage to the reputation of the FBI. While there is no doubt your 21 years of service to the organization cannot and should not be erased, it is difficult to fathom the repeated, sustained errors of judgement you made while serving as the lead agent in two of the most high profile investigations in the country.

As an organization we are entrusted to investigate high level public officials, regardless of party affiliation. If we ourselves show personal bias or demonstrate a lack of objectivity, that trust can be lost. Our ability to be objective, no matter which party, candidate, or officeholder is in power, must be beyond question. Candidates and office holders will come and go, but the FBI must be steadfast in its resolve to find the truth, regardless of our own personal leanings or beliefs. Though the Office of the Inspector General found no evidence of bias impacted any of your or the FBI's investigative actions or decisions, your sustained pattern of bad judgement in the use of an FBI device has called into question for many the decisions made during both the Clinton e-mail investigation and the initial states of the Russian Collusion investigation. In short, your repeated selfishness has called into question the credibility of the entire FBI.

As I considered all the known facts associated with the adjudication of your case it was difficult to imagine another incident like yours which brought so much discredit to the organization. In my 23 years in the FBI, I have not seen a more impactful series of missteps which called into question the entire organization and more thoroughly damaged the reputation of the organization. In our role as FBI employees we sometimes make unpopular decisions, but the public should be able to examine our work and not have to question our motives.

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In your adjudication, I removed all the politics, pundits, commentary, and the media from reporting the decision point which I must address. When I strip away all the “noise,” I am left with the facts and extremely damaging impact to the organization, which will take years to overcome. As Deputy Assistant Director you were expected to be a leader who was beyond reproach and set an example for not only our direct subordinates, but others throughout the organization who watched and observed your behaviors and actions. You failed to do so repeatedly and put your own interests about the interests of the organization. Though it pains me to do so, it is for this reason that I am dismissing you from the rolls of the FBI.

Sincerely,

David L. Bowdich  
Deputy Director

## Exhibit B

**From:** Bowdich, David L. (DO) (FBI)  
**Subject:** Re: Pride in the FBI  
**To:** Jim [REDACTED]  
**Sent:** July 14, 2018 12:42 PM (UTC-04:00)

Jim,

Thanks for the e-mail. Though I felt that Pete held up well on the Hill, he made some very serious mistakes by opining about a Presidential candidate, or maligning any political candidate. In the FBI we draw a very hard line about any political opinions at the workplace.....rightly so. In this case it was particularly harmful to our reputation with a segment of the country. Long and short is we all have the right to have our own political beliefs, but I have always tried to follow the mantra that we should check our political beliefs/leanings at the door. If after I give a speech or have a work related conversation, people should wonder is he a R or a D? If they do, then I have done my job in a professional manner.

All that said, it is nice to have the support of people like yourself. Much of the political banter is flat out wrong and unfair.....and unfortunately, some is fair. We always have to welcome LEGITIMATE oversight from all our oversight committees.

Anyway, I can go on and on. Most important, I hope you are doing well and it's good to hear from you. Glad you are enjoying [REDACTED] I thoroughly enjoyed my time there.

Dave

----- Original message -----

From: Jim [REDACTED] >  
Date: 7/12/18 8:26 PM (GMT-04:00)  
To: "Bowdich, David L. (DO) (FBI)" <dlbowdich@fbi.gov>  
Subject: Pride in the FBI

Hi Dave,

After having watched a few hours of Agent Strzok's testimony, I just want to share that he makes the Bureau look great, and the Republicans on the committee are coming across as the ones who operate with bias.

I hope you are smiling.

Jim

PS A year ago I moved to [REDACTED] area. I hope to see you and [REDACTED] out here some day when you're in the area.

"Being a bystander to suffering is not an option."

Sent from my iPhone

**Exhibit**  
**53**